

**RECEIVED**

**Sep 25 2023**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
COUNTY OF HORRY

Hope Dukes and Nicole Dukes,  
Plaintiffs,

vs.

Redfin Corporation, Christine LeFont,  
Rodolfo A Pisigan Jr., Portio O. Pisigan,  
Jeremy Pisigan, and Cherry C. Pisigan,  
Defendants.

IN THE CIRCUIT COURT

Case No. 2022-CP-26-4440

**AFFIDAVIT IN OPPOSITION TO  
PLAINTIFFS' MOTION FOR A JUDGMENT  
BY DEFAULT**

PERSONALLY APPEARED BEFORE ME, the undersigned, who first being duly sworn, states and deposes as follows:

1. I am a citizen and resident of Seattle, Washington. I am over the age of majority and of able body and sufficient mental capacity to make this Affidavit in Opposition to Plaintiffs' Motion for a Judgment by Default, in the captioned action.
2. I am employed as a Senior Manager, Office Management with Redfin Corporation, and was so employed on or about July 16, 2022. The office I occupy pursuant to my employment with Redfin Corporation is physically located at 1099 Stewart Street, Suite 600, Seattle, Washington ("Redfin Location").
3. I make this Affidavit of my free will, absent any duress, based upon my personal knowledge and/or any review of documents maintained by Redfin Corporation or documents otherwise necessary to address the content of this Affidavit.

4. I have reviewed a copy of PS Form 3811, July 2015, commonly known as and generally referred to as a Domestic Return Receipt, pursuant to which Plaintiffs allege they made service upon Redfin Corporation of the Summons and Complaint in this matter. A copy of the Domestic Return Receipt at issue is attached to this Affidavit as Exhibit A.

5. The Domestic Return Receipt indicates the contents of Article Number 7020 2450 0000 5661 7663 were delivered to the Redfin Location and received by "MB" on July 16, 2022.

6. I have personally reviewed the tracking information available from the United States Postal Service relative to delivery of Article Number 7020 2450 0000 5661 7663. This information, a copy of which is attached hereto as Exhibit B, demonstrates delivery on Saturday, July 16, 2022, at 6:22 p.m. The Redfin Corporation is not open for business on Saturdays, in general, and was not open on the specific Saturday of purported delivery, and thus no employee or other authorized agent or representative of Redfin Corporation was present at the Redfin Location at the date and time.

7. Further, there is no employee or other authorized agent or representative of Redfin Corporation, who works in or from the Redfin Location, with the initials "MB." Inquiry has been made of the employees of Redfin Corporation, who work at or from the Redfin Location and none are aware of the identity of the individual who purportedly received delivery of the documents sent under cover of the Domestic Return Receipt at issue, a copy of which is attached hereto. Further, there is nothing to indicate the documents were received by an employee or other authorized agent or representative at the Redfin Location.

8. Refin Corporation is not the sole occupant of 1099 Stewart Street, Seattle, Washington. Consequently, at the specified date and time of delivery, it is anticipated the documents at issue were left with an individual, not employed by or otherwise affiliated by Redfin Corporation, who was present in the lobby of the building of 1099 Stewart Street, Seattle, Washington.



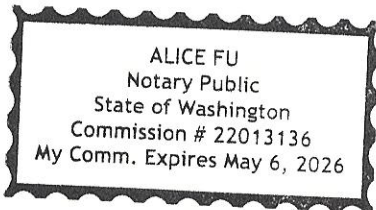
Emily Cisneros

Sworn to before me this

15<sup>th</sup> date of December, 2022



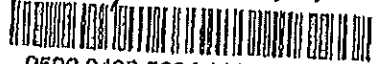
Notary Public for the State of Washington  
My Commission Expires: May 6, 2026



# EXHIBIT A

**SENDER COMPLETION SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
**Section Corporation**  
**1099 Stewart St**  
**Suite 600**  
**Seattle, WA 98101**  
  
**9590 9402 5834 0034 2300 93**

2. Article Number (Transfer from service label)  
**7020 2450 0000 5663 7663**

PS Form 3811, July 2015 PSN 7630-02-000-9063

**ADDRESSEE COMPLETION SECTION**

A. Signature  
*[Handwritten Signature]*  Agent  
 Addressee

B. Received by (Printed Name) *[Handwritten Name]* C. Date of Delivery  
*[Handwritten Date]*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type
- Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail
  - Insured Mail Restricted Delivery (over \$500)
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt

**FILED**  
**HORRY COUNTY**  
**2022 AUG 16 A 8:54**  
**RENEE N. ELVIS**  
**CLERK OF COURT**  
**HORRY COUNTY, SC**

# EXHIBIT B

# USPS Tracking®

[FAQs >](#)

Tracking Number:

[Remove X](#)

## 7020245000056617663

[Copy](#)

[Add to Informed Delivery \(https://informedelivery.usps.com/\)](https://informedelivery.usps.com/)

### Latest Update

Your item was delivered to the front desk, reception area, or mail room at 6:22 pm on July 16, 2022 in SEATTLE, WA 98101.

### Get More Out of USPS Tracking:

[USPS Tracking Plus®](#)

Feedback

#### Delivered

Delivered, Front Desk/Reception/Mail Room

SEATTLE, WA 98101

July 16, 2022, 6:22 pm

#### Out for Delivery

SEATTLE, WA 98101

July 16, 2022, 7:06 am

#### Arrived at Post Office

SEATTLE, WA 98101

July 16, 2022, 6:55 am

#### Departed USPS Regional Destination Facility

SEATTLE WA NETWORK DISTRIBUTION CENTER

July 15, 2022, 10:39 pm

#### Arrived at USPS Regional Destination Facility

SEATTLE WA NETWORK DISTRIBUTION CENTER

July 15, 2022, 10:06 pm

#### In Transit to Next Facility

July 15, 2022

**Arrived at USPS Regional Origin Facility**  
COLUMBIA SC PROCESSING CENTER  
July 14, 2022, 11:05 pm

**USPS in possession of item**  
COLUMBIA, SC 29229  
July 14, 2022, 11:25 am

Hide Tracking History

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package

Enter tracking or barcode numbers

## Need More Help?

Contact USPS Tracking support for further assistance.

FAQs