

EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

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ANDRE DEJESUS

Plaintiff,

Index No. 70307/2021E

vs.

THE GOVERNING BODY OF JEHOVAH’S WITNESSES,
WATCH TOWER BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA, WATCH TOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC and CRESTON KINGDOM HALL OF
JEHOVAH’S WITNESSES.

. Defendant.

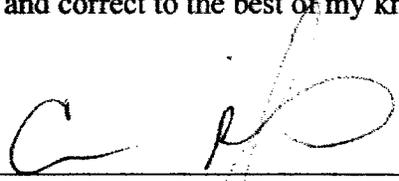
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STATE OF NEW YORK

COUNTY OF NEW YORK :SS:

Caren Rojas, being duly sworn deposed and said as follows:

1. I am of sound mind, over eighteen (18) years of age, fully competent to make this Affidavit and to testify to the matters stated in this Affidavit.
2. This Affidavit is based upon my personal knowledge and review of records maintained in the ordinary course of business.
3. I am an Account Manager at Lexitas (also known as PM Legal, LLC).
4. I have conducted a search of our records and I can confirm the following regarding our due diligence for Defendant The Governing Body of Jehovah’s Witnesses:
 - a. Process Server, Daniel Knight, 10/27/21, at 9:05 AM, attempted to serve The Governing Body of Jehovah’s Witnesses (“Defendant”), at the address of 1 Kings Drive, Tuxedo Park, NY 10987. He was told to wait at the security gate and after a while was then told there is no one there to accept service for the entity. See the Affidavit of Attempted Service as “Exhibit A”.
 - b. Process Server, William Feliciano, on 11/2/21 at 4:23 pm, attempted to serve Defendant, The Governing Body of Jehovah’s Witnesses at 100 Watchtower Drive, Patterson, NY 12563. He went to said location and found the location was Watchtower Bible & Tract Society Of New York, Inc. He asked for someone authorized to accept legal documents on behalf of Defendant and made contact with Jared Brannan. Mr. Brannan stated he was with the legal department for Watchtower Bible & Tract Society Of New York, Inc and they are not authorized to accept service on behalf of The Governing Body of Jehovah’s Witnesses and refused service. See the Affidavit of Attempted Service as “Exhibit B”.

- c. Process Server, Michael Roth, on 11/12/2021, 9:43AM 11/15/2021, 3:30PM and 11/27/2021, 9:41AM, attempted to serve the Defendant at the address of 216 E 183rd St, Bronx, NY 10458. He found they were closed on all attempts made. The property was closed with chains. See the Affidavit of Attempted Service as "Exhibit C".
 - d. Process Server, Erika Tejada, at 11/16/2021, 11:17AM, attempted to serve The Governing Body of Jehovah's Witnesses at 475 Riverside Drive, STE 727, New York, NY 10115. The Governing Body of Jehovah's Witnesses was unknown at this address. See the Affidavit of Attempted Service as "Exhibit D".
5. Process Server and Mailer, Shawn D. Forbes, on 12/2/21 mailed the Summons and Verified Complaint, Attorney's Verification, Notice of Electronic Filing, to all the attempted addresses provided above addressed to Defendant. The Affidavits of Service are attached as "Exhibit I".
6. I have read this Affidavit, and it is true and correct to the best of my knowledge and recollection.



 Caren Rojas

Sworn to before me this

28 day of July, 2022

Notary Public

