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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Wednesday, May 20, 2026 5:11 PM  
**To:** Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** LNC v. LPNM et al. Case No. 1:2026cv01562; Service Waivers

Dear Mr. Hyra:

I am authorized to receive service by Notice and Waiver for the May 15, 2026 lawsuit by the LNC against the Libertarian Party of New Mexico and ExCom members.

My authorization extends to the LPNM, Chris Luchini, Laura Burrows, and Paul McKenney. I also expect to get authorization for Frederick Snoy and James Wernicke within the next couple days. So please go ahead and send everything to me with the waivers to sign. Email is fine.

Very truly yours,

Alicia I. Dearn, Esq.  
4428 Louisiana Ave  
Saint Louis, MO 63111  
(314) 887-1100

California | Missouri | Federal

\*\*\*\*\*

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By sending communications by email, you are consenting to communicate with Justitia LLC by email. If you do not wish to use email to communicate with us, please contact us by telephone or mail.

<Waiver of Service of Summons - Snoy.pdf><Waiver of Service of Summons - Wernicke.pdf>

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**From:** Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>

**Sent:** Wednesday, May 20, 2026 5:09 PM

**To:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>

**Cc:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>

**Subject:** RE: LNC v. LPNM et al. Case No. 1:2026cv01562; Service Waivers

Thank you, Ms. Dearn

<image003.jpg>

**Clifford D. Hyra | Member  
Registered Patent Attorney, Trademark Attorney**

**a:** FRESH IP PLC | 11710 Plaza America Drive,  
Suite 2000 | Reston, VA 20190 | USA

**e:** [cliff@freship.com](mailto:cliff@freship.com) | **w:** [www.freship.com](http://www.freship.com)

**Direct:** +1-703-943-8703

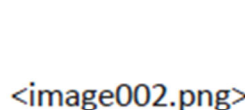
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**From:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>  
**Date:** Thursday, May 21, 2026 at 12:13 PM  
**To:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** RE: LNC v. LPNM et al. Case No. 1:2026cv01562; Service Waivers  
Good morning, Ms. Dearn:

Bardacke Allison Miller, LLP represents the LNC in this matter, please copy our team going forward. Attached are the waivers of service for LPNM, Chris Luchini, Laura Burrows, and Paul McKenney. A copy of the complaint is attached.

Have you obtained local counsel in this matter?

Best regards,  
Billy Trabaudo

 Billy Trabaudo  
Bardacke Allison Miller LLP  
[bardackeallison.com](http://bardackeallison.com)  
+1 505 995 8000

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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Thursday, May 21, 2026 11:58 AM  
**To:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** Re: LNC v. LPNM et al. Case No. 1:2026cv01562; Service Waivers

Hello Mr. Trabaudo,

To be clear, I have not been engaged yet. I have agreed to accept service to save everyone hassle and to set a uniform responsive deadline, but that is the extent so far. If I am engaged, I will apply to join the District of New Mexico's bar (not just PHV), as I appear to be eligible.

Also, I can confirm that I am authorized to accept service for Frederick Snoy and James Wernicke, if you'd like to send me those waivers.

Alicia I. Dearn, Esq.  
(314) 887-1100  
California | Missouri | Federal

On May 21, 2026, at 2:34 PM, Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)> wrote:

Hi Ms. Dearn,

Thank you for the information. Please see the attached waivers from Dr. Snoy and Mr. Wernicke.

If you could sign and return the waivers via email.

Best regards,  
Billy



Billy Trabaudo  
<image002.png> Bardacke Allison Miller LLP  
[bardackeallison.com](mailto:bardackeallison.com)  
+1 505 995 8000

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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Thursday, May 21, 2026 2:13 PM  
**To:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>;

Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** Re: LNC v. LPNM et al. Case No. 1:2026cv01562; Service Waivers

Attached are the executed waivers for all six defendants. This also confirms our understanding that responsive pleadings for all six defendants will be due 60 days from today, on July 20, 2026.

Very truly yours,

Alicia I. Dearn, Esq.  
4428 Louisiana Ave  
Saint Louis, MO 63111  
(314) 887-1100

California | Missouri | Federal

\*\*\*\*\*

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On May 28, 2026, at 11:11 AM, Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)> wrote:

Ms. Dearn,

Plaintiff plans to file a motion for a preliminary injunction which enjoins the defendants from using LIBERTARIAN PARTY®. Please let me know by EOD whether your clients oppose the motion and whether you will accept service via email.

Best regards,  
Billy Trabaudo

 Billy Trabaudo  
Bardacke Allison Miller LLP  
[bardackeallison.com](mailto:billy@bardackeallison.com)  
+1 505 995 8000

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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Thursday, May 28, 2026 10:48 AM  
**To:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>

**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** Re: LNC v. LPNM et al. Case No. 1:2026cv01562; PI Motion

Mr. Trabaudo,

As stated earlier, I have not been engaged yet, nor appeared for any of the defendants or applied for admission before the District of New Mexico. I simply accepted service of process by waiver for all the defendants to ensure there was no confusion on the answer deadline while the LNC was reconstituted.

As such, while I do appreciate the forewarning in case that hastens my engagement, I cannot accept service for any motion practice, nor can I represent defendants' positions on anything. I have reached out to them with the below message, and if my authority changes, I will let you know. I doubt I will have any such answer before EOD, so plan to go through normal process.

Alicia I. Dearn, Esq.  
(314) 887-1100  
California | Missouri | Federal

---

**From:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>  
**Date:** Thursday, May 28, 2026 at 11:53 AM  
**To:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** RE: LNC v. LPNM et al. Case No. 1:2026cv01562; PI Motion

Ms. Dearn,

I'm not sure how you can take the position that you are able to accept service of a complaint and sign a waiver but not a motion. The waiver represents to the Court that you are their agent.

In either event, if you would provide accurate contact information for the Defendants, including email and physical address, that would be helpful since we will need to serve the motion on them.

Best regards,  
Billy Trabaudo

**B | A | M**  
Billy Trabaudo  
Bardacke Allison Miller LLP  
[bardackeallison.com](http://bardackeallison.com)  
+1 505 995 8000

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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Thursday, May 28, 2026 11:04 AM  
**To:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>

**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** Re: LNC v. LPNM et al. Case No. 1:2026cv01562; PI Motion

An agent accepting process is not the same thing as counsel of record. I am sure you are aware of that, since service of process can be accepted by any competent adult or agent company so designated.

In any event, I do not have the information you request to hand. To the extent that I can help the defendants by providing cooperation, I will. But it won't be today, due to scheduling conflicts.

Alicia I. Dearn, Esq.  
(314) 887-1100  
California | Missouri | Federal

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**From:** Billy Trabaudo  
**Sent:** Thursday, May 28, 2026 11:13 AM  
**To:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** RE: LNC v. LPNM et al. Case No. 1:2026cv01562; PI Motion

Ms. Dearn,

The language of the waiver states that you represent them and it strains credulity to say that you do not have their contact information. And while you have not entered an appearance in this case, you have represented to the Court that you represent them as an attorney—you could not have signed the waiver otherwise. This attempt to avoid service will unnecessarily increase the cost of this litigation. We will send you the motion when it is filed, also attempt serve the parties physically, and attach this email exchange for the Court to consider.

Best regards,  
Billy Trabaudo

**BAM** Billy Trabaudo  
Bardacke Allison Miller LLP  
bardackeallison.com  
+1 505 995 8000

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On May 29, 2026, at 2:33 PM, Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)> wrote:

Ms. Dern,

Alongside the PI motion we will be filing an emergency motion for an expedited PI hearing and briefing schedule. If you could provide your client's positions on that motion as well. Do you have the correct mailing address or email Mr. McKenny and Dr. Snoy? If not we will leave their motions with the Court Clerk under Rule 5(b).

Best regards,  
Billy Trabaudo

 Billy Trabaudo  
Bardacke Allison Miller LLP  
[bardackeallison.com](http://bardackeallison.com)  
+1 505 995 8000

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**From:** Alicia Dearn <[alicia@dearnlaw.com](mailto:alicia@dearnlaw.com)>  
**Sent:** Friday, May 29, 2026 2:52 PM  
**To:** Billy Trabaudo <[billy@bardackeallison.com](mailto:billy@bardackeallison.com)>  
**Cc:** Andrew Cordero <[andrew@bardackeallison.com](mailto:andrew@bardackeallison.com)>; Justin Miller <[justin@bardackeallison.com](mailto:justin@bardackeallison.com)>; Aleksia Minetos <[Aleksia@bardackeallison.com](mailto:Aleksia@bardackeallison.com)>; Clifford Hyra <[cliff@freship.com](mailto:cliff@freship.com)>  
**Subject:** Re: LNC v. LPNM et al. Case No. 1:2026cv01562; Expedited Motion for Hearing and Briefing Schedule

Mr. Trabaudo,

You are mistaken on some fundamentals of civil procedure and due process, but perhaps I can help you avoid wasting your time.

I accepted notice and waived process as an agent under Rule 4. This is normal practice for agents, with the only requirement being that I am over the age of 18 and authorized. The fact that I'm an attorney does not automatically make me counsel of record, nor does waiver of service of summons automatically enter the defendants' appearance under Rule 5. Fun fact: the word "attorney" means "agent" not "counsel of record" as a matter of definition, so that will not save you when you complain about me to the judge.

I am also not required, nor even permitted, to share attorney-client privileged information with you. And so I decline. If you think that information I may possess about the defendants' whereabouts is not subject to privilege, you will have to test that by subpoena.

As previously mentioned, none of the parties have appeared under Rule 5 such that you can serve in a manner different than Rule 4 summons. If you wish to pursue a motion prior to their appearance, you will need to personally serve them under Rule 4. If you seek an *ex parte* order, I doubt you can meet the required exigency thresholds since the LPNM has used the alleged trademark since the 1970s.

Those are all the lessons on procedure that I'm willing to give you today. But to ensure you are absolutely clear on things, as I have now said them repeatedly: I AM NOT COUNSEL OF RECORD, HAVE NOT BEEN RETAINED TO DEFEND THIS CASE YET, AND WILL NOT ACCEPT ANY SERVICE, PROVIDE INFORMATION, OR REPRESENT POSITIONS ATTRIBUTABLE TO THE DEFENDANTS UNTIL AFTER I AM RETAINED AND AUTHORIZED TO DO SO.

If you represent to the Court that the papers have been served under Rule 5, that is a misrepresentation under Rule 11. Any orders you obtain on unserved motions will be void.

Regards,

Alicia I. Dearn, Esq.  
(314) 887-1100  
California | Missouri | Federal

**From:** Billy Trabaudo  
**Sent:** Friday, May 29, 2026 3:10 PM  
**To:** Alicia Dearn  
**Cc:** Andrew Cordero; Justin Miller; Aleksia Minetos; Clifford Hyra  
**Subject:** RE: LNC v. LPNM et al. Case No. 1:2026cv01562; Expedited Motion for Hearing and Briefing Schedule

Ms. Dern,

We will attach this email as well and let the Court know your position.

Best regards,  
Billy Trabaudo



Billy Trabaudo  
Bardacke Allison Miller LLP  
bardackeallison.com  
+1 505 995 8000

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