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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 **ANTHONY MITCHELL,**  
10 Plaintiff,

11 v.

12 **EMORY ANDREW TATE III, et al.,**  
13 Defendants.

Case No. **2:26-cv-00720-JAD-BNW**

**PLAINTIFF’S SUPPLEMENT TO MOTION  
FOR ORDER AUTHORIZING ALTERNATIVE  
SERVICE ON DEFENDANT EMORY  
ANDREW TATE III (SUPPLEMENT TO ECF  
NO. 18)**

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14 **PLAINTIFF’S SUPPLEMENT TO MOTION FOR ORDER AUTHORIZING  
ALTERNATIVE SERVICE ON DEFENDANT EMORY ANDREW TATE III  
(SUPPLEMENT TO ECF NO. 18)**

15 **INTRODUCTION**

16 Plaintiff respectfully submits this Supplement to his Motion for Order Authorizing Alternative Service  
17 on Defendant Emory Andrew Tate III (ECF No. 18, filed April 20, 2026), which is incorporated herein  
18 by reference in its entirety. This Supplement presents new developments occurring after ECF No. 18  
19 was filed and identifies additional proposed service methods not previously before the Court. Plaintiff  
20 does not repeat the factual and legal record set forth in ECF No. 18; all prior arguments, evidence, and  
21 proposed methods remain before the Court.

22 **I. PROCEDURAL DEVELOPMENTS SINCE ECF NO. 18**

23 By ECF No. 24, this action was reassigned from Judge Richard F. Boulware to the Honorable Jennifer  
24 A. Dorsey and Magistrate Judge Brenda N. Weksler; the case is now designated  
25 2:26-cv-00720-JAD-BNW. On May 17, 2026, Plaintiff filed the First Amended Complaint (FAC,  
26 ECF No. 34), adding Tristan Tate, Andrew Joslin, Thrift Technologies LLC, and Defied Trust Digital  
27 Trading – FZCO LLC as defendants. On May 21, 2026, the Clerk issued amended summonses for those  
28 newly added defendants (ECF No. 39). Service of the FAC on Defendant Andrew Tate remains  
outstanding.

## II. NEW EVIDENCE OF EVASION AND TRANSIENCE

1  
2 **A. Two Additional Failed U.S. Process-Server Attempts.** Following ECF No. 18, Plaintiff retained  
3 professional process servers to attempt personal service at two U.S. addresses identified through reverse  
4 location analysis of Defendant’s own publicly posted social media content. Both attempts were  
5 unsuccessful.

6 **Miami Beach, Florida — May 6, 2026.** On April 27, 2026, the @Cobratate account published a post  
7 depicting a Miami waterfront dock. Reverse location analysis identified the property as 1260 S.  
8 Venetian Way, Miami Beach, Florida 33139. On May 6, 2026, process server Daisy Diana Lopez  
9 attempted service at that address. The return states: “Unknown after attempting service — subject  
10 unknown; resident said just finished building the house.” Fee: \$76.00. Non-service return attached as  
11 **Exhibit G.**

12 **Beverly Hills, California — May 11, 2026.** On May 10, 2026, the @Cobratate account published a  
13 post depicting a poolside setting. Reverse location analysis identified the property as 1141 Summit  
14 Drive, Beverly Hills, California 90210, a luxury estate listed at approximately \$200,000 per month. On  
15 May 11, 2026, process server Vahan Alepyan attempted service at that address. The return states:  
16 “Moved after attempting service.” Fee: \$141.00. Non-service return attached as **Exhibit H.** Combined  
17 cost of both attempts: \$217.00.

18 **B. Documented Travel Pattern: Miami to Beverly Hills to Dubai.** The social media record confirms  
19 the following sequence, establishing a pattern of brief U.S. occupancy followed by immediate departure  
20 before service can be completed:

21 April 27, 2026: @Cobratate posts from Miami waterfront dock. May 10, 2026: @Cobratate posts from  
22 Beverly Hills poolside. May 15, 2026: @Cobratate posts “SKY SHOWER FROM NYC TO DUBAI”  
23 aboard a private two-story international jet with co-defendant Tristan Tate. May 16, 2026: @Cobratate  
24 posts “GM” from a Dubai penthouse. May 19, 2026: Third-party account @neoupdateshq posts video of  
25 Defendant arriving at his Dubai penthouse, independently corroborating his presence there as of  
26 May 19, 2026. Each disclosed U.S. location was vacated before service could be completed.

27 **C. May 21, 2026 Rumble Livestream: “Houses in 15 Countries.”** On May 21, 2026, Defendant  
28 Andrew Tate broadcast a Rumble livestream titled *Emergency Meeting, Episode 132* (7:30 a.m. EDT;  
rumble.com/v7a6854-emergency-meeting-episode-132-interface.html). At the 16:38 mark, Defendant  
states in his own words that he has “houses in 15 countries.” This present-tense, first-person admission  
made the day before this Supplement is filed directly corroborates the FAC’s allegations of a  
deliberately transient multi-country residential pattern with no fixed address amenable to conventional  
service. The same video’s scrolling footer displays University.com and JoinTheRealWorld.com — the  
newerlearning.net hub properties identified in FAC Exhibit 46 — confirming Defendant’s direct

1 operational connection to that enterprise as of the broadcast date. A screenshot of the footer and an  
2 AI-generated transcript of the relevant passage are attached as **Exhibit J**.

### 3 **III. ADDITIONAL PROPOSED SERVICE METHODS**

4 The following service methods are new and are in addition to the methods proposed in ECF No. 18. For  
5 the legal standard and due-process analysis governing all proposed methods, Plaintiff incorporates  
6 ECF No. 18 by reference.

7 **A. Service via Florida Appellate Counsel.** On May 5, 2026, Defendant Andrew Tate and  
8 co-defendant Tristan Tate initiated Case No. 4D2026-1301 in the Fourth District Court of Appeal of  
9 Florida. Thomas A. Maniotis of Equity Legal PLLC filed a jurisdictional brief covering both  
10 co-appellants on May 18, 2026 — four days before this Supplement — and paid the \$300 filing fee on  
11 the same date. Mr. Maniotis therefore holds a current, active attorney-client relationship with Defendant  
12 Andrew Tate as of this filing. The Florida ACIS docket is attached as **Exhibit I**. Plaintiff proposes  
13 service of the summons and FAC upon Mr. Maniotis in his capacity as counsel of record in Case  
14 No. 4D2026-1301.

15 **B. Update re: Meta Litigation Counsel (ECF No. 18, Method 1).** The Meta Litigation (Case  
16 No. 3:26-cv-00901-JSC, N.D. Cal.) was dismissed on or about April 28–30, 2026. Under  
17 Fed. R. App. P. 4(a)(1)(A), Raymond E. Brenneman’s deadline to file a notice of appeal falls at  
18 approximately May 28–30, 2026. On information and belief, Mr. Brenneman is therefore in current  
19 communication with Defendant regarding whether to pursue appellate relief, independently supporting  
20 service upon him as proposed in ECF No. 18.

21 **C. Service via Thrifty Consulting LLC.** Co-defendant Thrifty Consulting LLC has appeared through  
22 counsel (ECF No. 25). The FAC alleges that Thrifty Consulting LLC operated as an instrumentality of  
23 the Tate-controlled enterprise through the Thrift Technologies LLC / Andrew Joslin management chain,  
24 and that Defendant Tate utilizes Defendant Andrew Joslin and the Joslin-controlled entities — including  
25 Thrifty Consulting LLC — as instruments of that enterprise. (FAC ¶¶ 5b, 5d, 5e.) Plaintiff proposes  
26 service of the summons and FAC upon Thrifty’s registered agent, Cogency Global Inc., 850 New  
27 Burton Road, Suite 201, Dover, Delaware 19904, and upon Thrifty’s counsel of record, with a  
28 transmittal letter identifying Defendant Tate as the alleged principal of the enterprise of which Thrifty is  
an instrumentality.

**D. Service via Email to support@neweralearning.net.** FAC Exhibit 44 is a payment receipt  
transmitted directly from the neweralearning.net platform to Plaintiff, with support@neweralearning.net  
listed as the Reply-To address, establishing it as a live, monitored direct-contact business channel. FAC  
Exhibit 46 documents that the neweralearning.net hub directly links to JoinTheRealWorld.com and  
University.com. The May 21, 2026 Rumble livestream described in Section II.C displays those same

1 platforms in the video footer, confirming Defendant's active connection to the newerlearning.net  
2 enterprise on the broadcast date. Plaintiff proposes service via email to support@newerlearning.net.

3 **E. Service via thewarroom.ag Live Chat and Telegram.** Defendant Andrew Tate operates  
4 thewarroom.ag, a commercial platform with a live chat function and an associated Telegram channel,  
5 both constituting active, monitored contact points operated by or on behalf of Defendant. Plaintiff  
6 proposes service via the thewarroom.ag live chat interface and associated Telegram channel as a  
supplementary notice channel.

7 **IV. IMPRACTICABILITY OF SERVICE IN THE UNITED ARAB EMIRATES**

8 The evidence in Section II above is consistent with Defendant having relocated from Romania to the  
9 United Arab Emirates as his primary base. The UAE is not a signatory to the Hague Convention on the  
10 Service of Process. No Central Authority channel is available; service would require letters rogatory  
11 through diplomatic channels, a process estimated to take twelve to twenty-four months with no  
12 guarantee of completion. On information and belief, Defendant's UAE residence is a luxury rental  
13 property not registered in his name, making fixed-address foreign service impracticable independently  
14 of the diplomatic channel delay. This new evidence further confirms that court-ordered alternative  
service under Fed. R. Civ. P. 4(f)(3) is the only practicable method of effecting service on Defendant  
Andrew Tate.

15 **CONCLUSION**

16 For the foregoing reasons, and incorporating the arguments and evidence set forth in ECF No. 18 by  
17 reference, Plaintiff respectfully requests that the Court grant the pending motion as supplemented and  
18 authorize the following additional service methods: (1) service upon Thomas A. Maniotis (Equity Legal  
19 PLLC) as counsel of record in Florida Case No. 4D2026-1301; (2) service via Thrifty Consulting LLC's  
20 registered agent and counsel directed to Defendant Tate as alleged controlling principal; (3) service via  
21 email to support@newerlearning.net; and (4) service via thewarroom.ag live chat and associated  
22 Telegram channel, each in addition to and not in substitution of the methods proposed in ECF No. 18.

23 **CERTIFICATION PURSUANT TO D. NEV. LR 7-3**

24 This Supplement is directed at third-party alternative service methods, not at any discovered party.  
25 Defendant Andrew Tate has not been served or appeared. Of the defendants who have appeared, only  
26 Thrifty Consulting LLC has appeared through counsel (ECF No. 25); Plaintiff will serve a copy of this  
27 Supplement and the proposed order on Thrifty's counsel of record.  
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Dated: May 22, 2026

/s/ Anthony Mitchell

Anthony Mitchell, Plaintiff *Pro Se*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2026, I electronically filed the foregoing Supplement, together with Exhibits G, H, I, and J, with the Clerk of the Court using the CM/ECF system. Electronic service will be accomplished on all counsel of record registered as CM/ECF users, including counsel for Defendant Thrifty Consulting LLC.

/s/ Anthony Mitchell

Anthony Mitchell, Plaintiff *Pro Se*