



ATTORNEY GENERAL OF MISSOURI
CATHERINE L. HANAWAY

November 19, 2025

Office of the Clerk
Attn: Jessica Carter
United States District Court
for the Eastern District of Missouri
Southeastern Division
555 Independence Street
Cape Girardeau, MO 63703

Re: Request for Service of Final Judgment on Foreign Defendants in
Missouri ex rel. Hanaway v. People's Republic of China et al. No: 1:20-
cv-00099-SNLJ

Dear Ms. Carter,

In connection with the above-captioned case, we are writing to request that you take all necessary steps, pursuant to 28 U.S.C. § 1608(a)(4), to effect service on the following Defendants:

- People's Republic of China
- National Health Commission of the People's Republic of China
- Ministry of Emergency Management of the People's Republic of China
- Ministry of Civil Affairs of the People Republic of China
- People's Government of Hubei Province
- People's Government of Wuhan City

In the initial phase of this lawsuit, service under § 1608(a)(1) and (a)(2) could not be made. *See* Motion to Authorize Alternative Methods of Service Under 28 U.S.C. § 1608 and Federal Rule of Civil Procedure 4, ECF No. 19. Thus, Plaintiff State of Missouri, through Attorney General Catherine Hanaway, requests that the Clerk dispatch the alternative means of service provided for under 28 U.S.C. § 1608(a)(4), as the Court authorized and directed by its Order dated May 11, 2021. *See* ECF No. 22.

In these circumstances, pursuant to 28 U.S.C. § 1608(a)(4), the Clerk of Court shall send two copies of the default judgment, along with a translation of the default

judgment in the official language of the foreign-state defendant, “by any form of mail requiring a signed receipt, to be addressed and dispatched by the clerk of the court to the Secretary of State in Washington, District of Columbia, to the attention of the Director of Special Consular Services” The Secretary of State shall then take steps to effect service through diplomatic channels.

Pursuant to 28 U.S.C. § 1608(a)(4), I have enclosed: (1) two copies of the Default Judgment; (2) two copies of the Default Judgment translated into Standard Chinese (also sometimes commonly referred to as “Mandarin” or “Standard Mandarin”), the official language of the People’s Republic of China; (3) two copies of the Foreign Sovereign Immunities Act; and (4) two copies of the Foreign Sovereign Immunities Act translated into Standard Chinese.

Please take the necessary steps to dispatch these materials to effect service on Defendants pursuant to 28 U.S.C. § 1608(a)(4). The State Department provides the following address to use when dispatching the above documents to the Department:

Secretary of State
Attn: Director of Special Consular Services
U.S. Department of State
L/CA/POG/GC, SA-17, 10th Floor
Washington, DC 20522-1710
Attn: FSIA

Sincerely,

CATHERINE L. HANAWAY
Attorney General

/s/ Samuel C. Freedlund
Samuel C. Freedlund, 73707MO
Deputy Solicitor General
Office of the Attorney General
815 Olive St.
Suite 200
St. Louis, Missouri 63101
Phone: (314) 340-4869
Fax (573) 751-1774
Samuel.Freedlund@ago.mo.gov
Attorney for Plaintiff State of Missouri

cc: Director of the Office of Special Consular Services, U.S. Department of State