

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA

**Bridlington Bud Ltd. v. The Partnerships, Unincorporated
Associations Identified on Schedule A**

Bridlington Bud · No. 25-cv-25988-DPG · Decided March 26, 2026

SUMMARY

The United States District Court for the Southern District of Florida grants Plaintiff’s ex parte motion for alternative service under Federal Rule of Civil Procedure 4(f)(3). The Court authorizes service by emailing a designated notice website to email addresses associated with Defendants’ Walmart merchant accounts and by providing access to the website, and directs Walmart to provide the relevant email addresses within two business days.

CASE DETAILS

COURT	United States District Court for the Southern District of Florida
WRITING FOR THE COURT	Darrin P. Gayles
JURISDICTION	United States District Court for the Southern District of Florida
DECIDED	March 26, 2026
DOCKET	25-cv-25988-DPG
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed an ex parte motion for authorization to serve foreign defendants by e-mail and website posting under Federal Rule of Civil Procedure 4(f)(3).
STANDARD OF REVIEW	The court exercised its discretion under Federal Rule of Civil Procedure 4(f)(3) to determine whether the proposed alternative service methods were consistent with due process and not prohibited by international agreement.
PRECEDENTIAL VALUE	Unknown; district court order

TOPICS

- service of process
- civil procedure
- commercial litigation

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court could authorize alternative service on foreign corporate defendants under Federal Rule of Civil Procedure 4(f)(3) without requiring prior attempts at service under Rule 4(f)(1) or 4(f)(2).
2. Whether service by e-mail and website posting was prohibited by the Hague Convention or inconsistent with due process.

HOLDINGS

1. A court may authorize alternative service under Rule 4(f)(3) without requiring the plaintiff to first attempt service by other means, provided the authorized method is consistent with due process and is not prohibited by an international agreement.
2. Service by e-mail and website posting was not prohibited by the Hague Convention because China's objection to Article 10 methods did not expressly extend to those methods.
3. Service by e-mail and website posting satisfied due process because the methods were reasonably calculated to apprise defendants of the action and provide an opportunity to respond.

KEY QUOTATIONS

“A court acting under Rule 4(f)(3) therefore remains free to order alternative means of service where [the] signatory nation” at issue “has not expressly objected to those means.”

“reasonably calculated, under all circumstances, to apprise . . . [Defendants] of the pendency of the action and afford them an opportunity to present their objections.”

FACTUAL BACKGROUND

The defendants reportedly reside in or operate from China and conduct Internet-based businesses. They used e-mail addresses to register as merchants on Walmart's platform, and the plaintiff created a website to provide notice of the action. Plaintiff proposed serving the summonses, complaint, and other filings by e-mailing the website address to defendants' known business e-mail addresses and by providing access to the website.

PROCEDURAL HISTORY

Plaintiff sought alternative service on defendants reportedly located in or operating from China. The district court granted the motion and authorized service by sending a designated notice website to e-mail addresses associated with defendants' Walmart merchant accounts and by providing access to the notice website.

DISPOSITION

other

CASES CITED

- Rio Props., Inc. v. Rio Int'l Interlink, 284 F.3d 1007, 1015-16 (9th Cir. 2002)
- Brookshire Brothers, Ltd. v. Chiquita Brands Int'l, Inc., No. 05-cv-21962, 2007 WL 1577771, at *1-2 (S.D. Fla. May 31, 2007)
- Prewitt Enters., Inc. v. Org. of Petroleum Exporting Countries, 353 F.3d 916, 921, 927 (11th Cir. 2003)
- Stat Med. Devices, Inc. v. HTL-Strefa, Inc., No. 15-cv-20590, 2015 WL 5320947, at *3 (S.D. Fla. Sep. 14, 2015)
- Karsten Mfg. Corp. v. Janit Store, No. 18-61624-CIV, 2018 U.S. Dist. LEXIS 225682, at *3-4 (S.D. Fla. Jul. 26, 2018)
- Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950)

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