

BMC 08
PJS/TNL

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

AF HOLDINGS, LLC	:	Case No.:
	:	
Plaintiff,	:	
	:	Related Civil Action No.:
v.	:	2:12-cv-00262-WCO (N.D. Ga.)
	:	
RAJESH PATEL,	:	
	:	
Defendant.	:	

Declaration of Blair Chintella

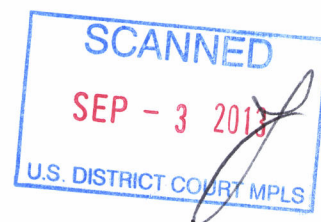
1. Attached to the Memorandum of Law in Support of Motion for Contempt are true and correct copies of e-mails between myself and Paul Hansmeier. Also attached are true and correct copies of the subpoena served on him and the proof of service.

2. On July 22, 2013, I left a voicemail with Paul Hansmeier stating that we needed to discuss his non-compliance with a subpoena that my client served on him on August 5, 2013, which is attached to the above Motion.

3. I was never served with an objection to the subpoena by Mr. Hansmeier and did not receive any production by its deadline of August 20, 2013.

4. I received a call back from Mr. Hansmeier but I was in the middle of a meeting, so I exchanged e-mail addresses with him and told him to send me an e-mail formally requesting the extension of time that he was seeking (he asked for "one week") so we could have a record of our correspondence.

5. During our phone conversation, I never promised Mr. Hansmeier that I



would grant an extension of time and I can provide one or more witnesses to that fact upon request.

6. I never received an e-mail from Mr. Hansmeier after our conversation requesting an extension of time.

7. On August 27, 2013 I contacted Mr. Hansmeier again via e-mail to discuss his non-compliance, and as the attached e-mails show, Mr. Hansmeier falsely stated that I had promised an extension time, and that he fully intended to comply with the subpoena by August 30, 2013.

8. Despite this, I considered Mr. Hansmeier's initial request for one-week and agreed to a one-week extension of time to comply with the subpoena on behalf of my client. However, as the e-mail explains, I made it clear that my client was not granting an extension of time for Mr. Hansmeier's failure to properly object to the subpoena pursuant to Rule 4(c)(2)(B)(i).

9. As of signing this Declaration, I have yet to receive any production regarding the subpoena served on Mr. Hansmeier.

I declare under penalty of perjury that the foregoing is true and correct:

Signature: /s/ Blair Chintella Date: 8/30/2013
Blair Chintella