

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

AF HOLDINGS, LLC	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	2:12-cv-00262-WCO
	:	
RAJESH PATEL,	:	
	:	
Defendant.	:	

**Defendant’s Notice of Service of Audio Clips**

COMES NOW, Rajesh Patel, by and through counsel, filing this **Defendant’s Notice of Service of Audio Clips**, showing the Court as follows:

On August 14, 2013, Defendant filed his **Defendant’s Response to Plaintiff’s Second Motion for Protective Order with Motion to Quash and Motion to Seal** (ECF #61), which included several attachments with audio clips embedded in them, (Exhibit GD1 through GD9). Prior to filing, Defendant was unable to find a local rule or standing order describing how audio clips should be filed through the CM/ECF system, whether by embedding them or otherwise.

After filing Exhibits GD1 through GD9, Defendant became aware that it might be confusing to play the audio because there are multiple PDF readers on the market – the most common being Adobe Acrobat – and that each comes with a

variety of settings that can be adjusted.<sup>1</sup> As a result, Defendant mailed the Court and Plaintiff a copy of a CD that contained the audio clips in the commonly-used audio file format of “.mp3.” The audio clips on the CD are identical to the ones embedded and correlate as follows:<sup>2</sup>

<u>File name on CD</u>	<u>Corresponding Embedded Exhibit</u>
11152012_135531pm-redacted.mp3	<u>Exhibit GD1</u>
11292012_131858pm-redacted.mp3	<u>Exhibit GD2</u>
02042013_115600am-redacted.mp3	<u>Exhibit GD3</u>
03052013_123121pm-redacted.mp3	<u>Exhibit GD4</u>
03052013_144134pm-redacted.mp3	<u>Exhibit GD5</u>
11262012_075042am-redacted.mp3	<u>Exhibit GD6</u>
11262012_095014am-redacted.mp3	<u>Exhibit GD7</u>
11292012_143334pm-redacted.mp3	<u>Exhibit GD8</u>
11292012_152805pm-redacted.mp3	<u>Exhibit GD9</u>

Defendant also wants to clarify where, exactly, in each Exhibit that the audio can be found. Using the Foxit PDF reader, a black box can be seen immediately *below the date* on each PDF. Clicking inside the box and then clicking on the “Play” button that appears will play the audio. Other PDF readers may or may not

<sup>1</sup> Defendant is using a PDF reader called “Foxit,” which can be downloaded for free at <http://www.foxitsoftware.com/downloads/>. However, even this free lightweight reader has a default setting that must be adjusted. A user must click “File,” “Preferences,” “Trust Manager,” and *uncheck* the box titled “Enable Safe Reading Mode.”

<sup>2</sup> The file names were assigned by GoDaddy in its production and reflect the date and time of the calls. The only changes made were to add “-redacted” to show that Defendant reviewed them to redact PIN numbers, credit card numbers, etc.

show the black box, but it should still be clickable.

Respectfully submitted August 26, 2013:

          /s/ Blair Chintella            
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 Plaintiff, :  
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 RAJESH PATEL, :  
 :  
 Defendant. :

**Certificate of Service**

I hereby certify that on August 26, 2013, I filed the **Defendant's Notice of Service of Audio Clips** with the Clerk of Court using the Court's CM/ECF system, which will automatically e-mail a copy to the following persons:

**Jacques Nazaire (for Plaintiff)**  
**Michael Goldman (for Non-Party Comcast)**

Dated August 26, 2013:

Respectfully Submitted:

/s/ Blair Chintella

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