

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

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

PLAINTIFF’S NOTICE OF OBJECTION

PLEASE TAKE NOTICE that Plaintiff, by and through counsel, Objects to Defendant’s Notice of Depositions attached as **Exhibit A** and any notice of depositions of any representatives of plaintiff for the following reasons.

1. The request(s) is/are not accompanied by the necessary fees for travel.
2. The request(s) was/were not properly served.
3. The request(s) is/are made for the sole reason of harassing the individuals who were to be served. Please see **Exhibit B**, which demonstrates that a video of the deposition will be issued out to all individuals, even stalkers, who pay for a copy of the videotaped deposition. The foregoing will put the proposed deponents at risk. Possible injuries to the proposed deponents are clearly *foreseeable*.

Dated August 27, 2013:

Respectfully Submitted:

 /s/ Jacques Nazaire

Jacques Nazaire

GA Bar No. 142388

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Local Rule 7.1(D) Certification

I hereby certify that Plaintiff's Notice of Objection complies with all sections of LR5.1

Dated: August 27, 2013:

Respectfully Submitted:

 /s/ Jacques Nazaire
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	:	
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Certificate of Service

I hereby certify that on August 27, 2013, I filed the Plaintiff's Notice of Objection with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification to the following attorney(s) of record:

Blair Chintella, attorney for Defendant
Michael J. Goldman, attorney for Comcast

Dated: August 27, 2013:

Respectfully Submitted:

/s/ Jacques Nazaire
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