

**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.	:	

**Joint Consent Motion to Seek a Continuance**

COMES NOW, Plaintiff, Defendant, and Jacques Nazaire, filing this Joint Motion to Seek a Continuance (“Parties”), showing the Court as follows:

**Relevant Facts**

A hearing is currently scheduled in this matter for November 13, 2014. [115]. Counsel for Plaintiff Paul Duffy is currently required to attend a hearing in St. Louis Missouri on November 12, 2014 at 1:30 PM in the case of *Lightspeed Media Corporation v. Smith et al.*, SDIL, 3:12-cv00889, and attendance at this hearing is mandatory as shown by the following minute order (attached):

NOTICE of Hearing on Motion 153 MOTION for Sanctions for Obstructing Discovery, 135 SEALED MOTION for contempt. Motion Hearing set for 11/12/2014 at 01:30 PM in East St. Louis Courthouse before Chief Judge David R. Herndon. The parties may NOT appear by phone for the hearing. (kbl)THIS TEXT ENTRY IS AN ORDER OF THE COURT. NO

FURTHER DOCUMENTATION WILL BE MAILED.  
(Entered: 07/30/2014)

*Lightspeed docket*, minute order entered at Dkt. #182. Mr. Duffy does not know how long this hearing would take, and even if it is a short hearing, it would not be feasible for Mr. Duffy to arrange travel to Gainesville, Georgia for a hearing at 10:00 AM the next morning.

There is another hearing that Mr. Duffy is required to attend on November 18, 2014 in the case of *Prenda Law, Inc. v. Paul Godfread, et al.*, ILND, 1:13-cv-04341 on November 18, 2014. This hearing was originally scheduled for November 11, 2014 (Doc. # 75 in the case), was re-scheduled for November 13, 2014 (Doc. #76) likely to take account of Veteran's Day, and was re-scheduled again for November 18, 2014 (Doc. # 77 attached hereto).

In order to accommodate Mr. Duffy's conflicting schedule taking into account his necessary travel arrangements, the signatories hereby file this motion for permission to move the Court for a short continuation of the hearing currently scheduled for November 13, 2014.

The Parties therefore request permission to file the attached motion seeking to briefly continue the hearing currently scheduled for November 13, 2014 until any date after November 18, 2014.

**Conclusion**

Therefore, the signatories hereby seek to file a motion for the brief continuance of the November 13, 2014 hearing until any time after November 18, 2014.

Respectfully submitted November 6, 2014:

/s/ Paul Duffy

*(signed with express permission)*  
*Pro Hac for Plaintiff*  
Illinois Bar # 6210496  
Duffy Law Group  
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(312) 952-6136

/s/ Blair Chintella

For Defendant  
Bar # 510109  
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/s/ Judith Delus

*(signed with express permission)*  
*Local Counsel for Plaintiff*  
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/s/ Jacques Nazaire

*(signed with express permission)*  
*Pro se*  
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404-923-0529

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	:	
Defendant.	:	

**Local Rule 7.1(D) Certification**

I hereby certify that **Joint Consent Motion to Seek a Continuance** comply with LR 5.1B.

Dated November 6, 2014:

          /s/ Blair Chintella          

For Defendant  
Bar # 510109  
2483 Shoals Ter.  
Decatur, GA 30034  
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**Certificate of Service**

The undersigned hereby certifies that on November 6, 2014 he served the above Joint Consent Motion to Seek a Continuance by filing it through the court’s CM/ECF system, which will automatically serve a copy to all parties of record:

Respectfully submitted November 6, 2014:

          /s/ Blair Chintella          

For Defendant  
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