

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

AF HOLDINGS, LLC,

Civil Action No. 2:12-CV-00262-WCO

Plaintiff,

v.

RAJESH PATEL,

Defendant.

AFFIRMATION OF NON-CONSENT

The following affirmation is submitted to notify this Court that the undersigned does not consent to any relief requested in Defendant's "requests" to file a motion numbered "ECF 124" and "ECF 125". The undersigned believes that the Defendant has made this request in bad faith.

1. On September 11, 2014, the Court ordered that the hearing previously held on January 28, 2014 be continued in November, 2014. The defendant strategically¹ waited until the evening of November 13, 2014, more than 90 days after the Court notice, seeking additional discovery, promising to make the motion prior to the next Court date. Nevertheless, if the Court grants this unusual request, the Plaintiff will have to be given 14 days, per

¹ The Strategy is to increase crowdfunding and to run up the attorney's fees.

the local rules to respond, which pushes the motion pass the next court date.

2. The Defense has no legitimate purpose for this motion. The primary purpose for the defense's motion is to stretch out this case and continue promoting a particular law firm. Attached as **Exhibit A**. is a copy of the website display whereby it uses the "Patel Case" to continue promoting a law practice. The page also demonstrates that the defense has exploited my name without compensating me for the same. The website can also be viewed by typing Chintellalaw.com.
3. Another purpose for the Defense's request is for it to continue profiting from crowdfunding. On last count, the Patel Crowd funder had collected \$3,020.00. See **Exhibit B**. The defense failed to notify the Court of the same which demonstrates the level of respect the defense has for the law.
4. Additionally, the defense does not require any further discovery. On the internet, the defense writes the following regarding this instant case. "Numerous subpoenas were served across the country revealing important information, for instance, audio recordings of customer service calls to GoDaddy."
5. It appears that through its pleadings the defense submits to this Court that it has not received discovery, yet to its loyal followers it laughs and boast about all the discovery and information it has received. It appears that the

defense is attempting to convince its loyal followers that it can sway the Court into awarding discovery to Patel. While this may be humorous to the defense, it merely serves as invasion of privacy.

6. Amongst the illegitimate purposes that the defense may use future “discovery” for is to harass “John Steele”. The defense is building a timeline regarding John Steele. One may ask “why would one man dedicate his entire life to follow the life of another man?” Such a question would be irrelevant. What is relevant however, is that discovery should not be awarded for the purpose of building timelines on non-parties. As proof that the defense is misusing discovery to build a timeline regarding John Steele, please type in the URL http://www.tiki-toki.com/timeline/entry/114086/Steele-Co.-by-Blair-Chintella-Esq/#vars!date=2010-01-22_00:00:00! or one may simply use the search terms “Timeline of John Steele”.
7. Additionally, a member of the defense, consistently makes irrelevant and disingenuous motions. Please see a Judge’s decision indicating the same and attached as **Exhibit C**.
8. The foregoing statements are not written to insult any particular party, rather they are submitted to apprise that Court of the true intents of the Defense.

Conclusion

WHEREFORE, the undersigned respectfully request that the Court takes note of his non-consent.

Respectfully Submitted,

DATED: November 14, 2014

By: /s/ Jacques Nazaire

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

Local Rule 7.1(D) Certification

I hereby certify that the enclosed complies with LR 5.1B.

Dated November 14, 2014:

Respectfully Submitted:

_____/s/ Jacques Nazaire_____
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	:	
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Certificate of Service

I hereby certify that on November 14, 2014, I filed the enclosed using the CM/ECF system which will automatically send e-mail notification to the all attorneys of record:

Dated: November 14, 2014

Respectfully Submitted:

/s/ Jacques Nazaire
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