

Exhibit D

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

AF HOLDINGS, LLC,

Plaintiff,

-v-
RAJESH PATEL,

Defendant.

Civil Action Number
2:12-cv-00262-WCO

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S SECOND
REQUEST FOR ADMISSIONS**

TO DEFENDANT'S COUNSEL

Without waiving its motion for Protective Order, Plaintiff, through and by its counsel, Jacques Nazaire, Esq., in response to Defendant's Second Request For Admissions, hereby sets forth the following statements.

1. Objected to as Vague.
2. Objected to as Vague.
3. Objected to as vague.
4. Objected to as vague.
5. Objected to as vague.
6. Objected to as vague.
7. Objected to as vague.
8. Objected to as vague.
9. Objected to as vague.
10. Objected to as vague.
11. Objected to as vague.
12. Objected to as vague.
13. Objected to as vague.
14. Objected to as vague.

- 1 15. Objected to as vague.
- 2 16. Objected to as vague.
- 3 17. Objected to as vague.
- 4 18. Objected to as vague.
- 5 19. Objected to as vague.
- 6 20. Objected to as vague.
- 7 21. Objected to as vague.
- 8 22. Objected to as vague.
- 9 23. Objected to as vague.
- 10 24. Objected to as vague.
- 11 25. Objected to as vague.
- 12 26. Objected to as vague.
- 13 27. Objected to as vague.
- 14 28. Objected to as vague.
- 15 29. Objected to as vague.
- 16 30. Objected to as vague.
- 17 31. Objected to as vague.
- 18 32. Objected to as vague.
- 19 33. Objected to as vague.
- 20 34. Objected to as vague.
- 21 35. Objected to as vague.
- 22 36. Objected to as vague.
- 23 37. Objected to as vague.
- 24 38. Objected to as vague.
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- 1 39. Objected to as vague.
- 2 40. Objected to as vague.
- 3 41. Objected to as vague.
- 4 42. Objected to as vague.
- 5 43. Objected to as vague.
- 6 44. Objected to as vague.
- 7 45. Objected to as vague.
- 8 46. Objected to as vague.
- 9 47. Objected to as vague.
- 10 48. Objected to as vague.
- 11 49. Objected to as vague.
- 12 50. Objected to as vague.
- 13 51. Objected to as vague.
- 14 52. Objected to as vague.
- 15 53. Objected to as vague.

21 Respectfully Submitted,

22 AF HOLDINGS

23 **DATED: August 28, 2013**

24 By: s/ Jacques Nazaire
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

AF HOLDINGS, LLC,

Plaintiff,

-v-

RAJESH PATEL,

Defendant.

Civil Action Number
2:12-cv-00262-WCO

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S THIRD
REQUEST FOR ADMISSIONS**

TO DEFENDANT'S COUNSEL

Plaintiff, through and by its counsel, Jacques Nazaire, Esq., in response to Defendant's Third requests for admissions, hereby sets forth the following.

1. Objected to under FRE 1002.
2. Objected to under FRE 1002.
3. Objected to under FRE 1002.
4. Objected to under FRE 1002.
5. Objected to under FRE 1002.
6. Objected to under FRE 1002.
7. Objected to under FRE 1002.
8. Objected to under FRE 1002.
9. Objected to under FRE 1002.
10. Objected to under FRE 1002.
11. Objected to under FRE 1002.
12. Objected to under FRE 1002.
13. Objected to under FRE 1002.
14. Objected to under FRE 1002.

- 1 15.Objected to under FRE 1002.
- 2 16.Objected to under FRE 1002.
- 3 17.Objected to under FRE 1002.
- 4 18.Objected to under FRE 1002.
- 5 19.Objected to under FRE 1002.
- 6 20.Objected to under FRE 1002.
- 7 21.Objected to under FRE 1002.
- 8 22.Objected to under FRE 1002.
- 9 23. Objected to under FRE 1002.
- 10 24. Objected to under FRE 1002.
- 11 25.Objected to under FRE 1002.
- 12 26.Objected to under FRE 1002.
- 13 27. Objected to under FRE 1002.
- 14 28. Objected to under FRE 1002.
- 15 29.Objected to under FRE 1002.
- 16 30.Objected to under FRE 1002.
- 17 31.Objected to under FRE 1002.
- 18 32.Objected to under FRE 1002.
- 19 33.Objected to under FRE 1002.
- 20 34.Objected to under FRE 1002.
- 21 35.Objected to under FRE 1002.
- 22 36.Objected to under FRE 1002.
- 23 37.Objected to under FRE 1002.
- 24 38.Objected to under FRE 1002.
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- 1 39. Objected to under FRE 1002.
- 2 40. Objected to under FRE 1002.
- 3 41. Objected to under FRE 1002.
- 4 42. Objected to under FRE 1002.
- 5 43. Objected to under FRE 1002.
- 6 44. Objected to under FRE 1002.
- 7 45. Objected to under FRE 1002.
- 8 46. Objected to under FRE 1002.
- 9 47. Objected to under FRE 1002.
- 10 48. Objected to under FRE 1002.
- 11 49. Objected to under FRE 1002.
- 12 50. Objected to under FRE 1002.
- 13 51. Objected to under FRE 1002.
- 14 52. Objected to under FRE 1002.
- 15 53. Objected to under FRE 1002.
- 16 54. Objected to under FRE 1002.
- 17 55. Objected to under FRE 1002.
- 18 56. Objected to under FRE 1002.
- 19 57. Objected to under FRE 1002.
- 20 58. Objected to under FRE 1002.
- 21 59. Objected to under FRE 1002.
- 22 60. Objected to under FRE 1002.
- 23 61. Objected to under FRE 1002.
- 24 62. Objected to under FRE 1002.
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- 1 63. Objected to under FRE 1002.
- 2 64. Objected to under FRE 1002.
- 3 65. Objected to under FRE 1002.
- 4 66. Objected to under FRE 1002.
- 5 67. Objected to under FRE 1002.
- 6 68. Objected to under FRE 1002.
- 7 69. Objected to under FRE 1002.
- 8 70. Objected to under FRE 1002.
- 9 71. Objected to under FRE 1002.
- 10 72. Objected to under FRE 1002.
- 11 73. Objected to as the request refers to a non-party.
- 12 74. Objected to as ambiguous.
- 13 75. Objected to as ambiguous.
- 14 76. Objected to as it is impossible for Plaintiff to admit to such conclusory
- 15 statements.
- 16 77. Objected to as it the request refers to a non-party.
- 17 78. Objected to as it calls for a conclusion of law.
- 18 79. Objected to as ambiguous.
- 19 80. Objected to as ambiguous, non-party.
- 20 81. Objected to; ambiguous, non-party.
- 21 82. Objected to as ambiguous.
- 22 83. Objected to; does not cover the period of offense.
- 23 84. Objected to; does not cover the period of offense.
- 24 85. Objected to; does not cover period of offense.

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86. Objected to; does not cover period of offense.

87. Objected to; does not cover period of offense.

88. Objected to as ambiguous.

89. Objected to; ambiguous.

90. Objected to; ambiguous.

91. Objected to; ambiguous; non-party.

92. Objected to; concerns non-parties.

93. Objected to; concerns non-parties;

94. Objected to; concerns a nonparty.

95. Objected to; concerns a non-party.

96. Objected to; concerns a non-party.

89. Objected to under FRE 1002.

90. Objected to under FRE 1002.

91. Objected to under FRE 1002.

92. Objected to under FRE 1002.

93. Objected to under FRE 1002.

94. Objected to under FRE 1002.

95. Plaintiff cannot admit or deny since to the extent legible, these documents were not created by plaintiff.

96. Plaintiff cannot admit or deny as the exhibits are barely legible. .

97. Plaintiff cannot admit or deny as the exhibits are barely legible.

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98. Plaintiff cannot admit or deny as the exhibits are barely legible.

Respectfully Submitted,

AF HOLDINGS

DATED: September 3, 2013

By: *Jacques Nazaire*
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