

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AF HOLDINGS, LLC,)	
Plaintiff/Counterdefendant,)	
v.)	Civil Action No. 1:12-cv-12105-JLT
SANDIPAN CHOWDHURY,)	
Defendant/Counterplaintiff.)	

**DEFENDANT/COUNTERPLAINTIFF’S MOTION FOR A FINDING OF CONTEMPT AND
AN ORDER OF SANCTIONS**

Defendant/Counterplaintiff Sandipan Chowdhury (“Chowdhury”) hereby moves the Court to issue a finding of civil contempt of its September 30, 2013 order, entered as final judgment on October 22, 2013 (the “Judgment”) jointly and severally against Plaintiff/Counterdefendant AF Holdings, LLC and its aliases Prenda Law, Inc., John Steele, Paul Hansmeier, Paul Duffy, and Mark Lutz (collectively, “the Prenda parties”) for failure to timely satisfy the Judgment. Chowdhury also moves for issuance of an order requiring the Prenda parties to each pay a daily fine until the Judgment is satisfied, and for an award of attorney’s fees incurred by Chowdhury in connection with the preparation of this motion and Chowdhury’s response to Steele and Hansmeier’s motions to set aside the Judgment.

In support of this motion, Chowdhury relies on the Memorandum in Support of Motion for Civil Contempt of Final Judgment Jointly and Severally Against Plaintiff and Its Aliases filed simultaneously herewith. A proposed order is attached.

Dated: December 24, 2013

Respectfully Submitted,

/s/ Jason Sweet
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Counsel for Sandipan Chowdhury

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and that paper copies will be sent to those indicated as non-registered participants on December 24, 2013; and, further, that I sent a copy of the foregoing to John Steele, Paul Hansmeier, and Paul Duffy by electronic mail.

/s/ Jason Sweet

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

I, Jason E. Sweet, hereby certify that counsel for Sandipan Chowdhury conferred with opposing counsel in a good faith effort to resolve or narrow the issues in the foregoing motion.

/s/ Jason Sweet