

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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

**DEFENDANT’S MOTION FOR
DEFAULT JUDGMENT AGAINST PLAINTIFF AF HOLDINGS, LLC**

Defendant/Counterplaintiff Sandipan Chowdhury (“Defendant”), by his attorney, hereby moves for Default Judgment against Plaintiff/Counterdefendant AF Holdings, LLC (“Plaintiff”) under Rule 55(b) of the Federal Rules of Civil Procedure resulting from Plaintiff AF Holdings, LLC’s default on August 29, 2013. The grounds for this motion, as more fully set forth in the accompanying memorandum of law, are as follows: 1) Plaintiff has failed to respond to Defendant’s Counterclaims within the time allotted under Rule 12(a)(1) of the Federal Rules of Civil Procedure for; 2) Plaintiff has failed to comply with the Court’s June 19, 2013 Order requiring Plaintiff to post a \$60,000 bond; and 3) Plaintiff received a Notice of Default on August 29, 2013 as a result of the failure to respond.

Dated: September 13, 2013

Respectfully,

/s/ Jason Sweet

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*ALLOWED
WITHOUT OPPOSITION
J. Tamm DJ
9/30/13*

Counsel for Sandipan Chowdhury

¹ As noted in the supporting memorandum, AF Holdings has been found to be an alias of Prenda Law, Inc. and its principals — John Steele, Paul Duffy and Paul Hansmeier.