

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

COUNTRYMAN NEVADA, LLC )  
 )  
 Plaintiff, ) Civil Action Case No. 14-cv-00073  
 )  
 v. )  
 )  
 DOES 1-30 )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

**MOTION FOR LEAVE TO SERVE THIRD PARTY SUBPOENAS  
PRIOR TO A RULE 26(f) CONFERENCE**

Pursuant to Fed. R. Civ. P. 26(d)(1), and upon the attached: (1) Memorandum of Law in support of this motion; and (2) Declaration of Daniel Macek in support of this motion, Plaintiff respectfully moves for entry of an order granting it leave to serve third party subpoenas prior to a Rule 26(f) conference (the "Motion"). A proposed order is attached for the Court's convenience.

DATED: February 28, 2014

Respectfully submitted,

*/s/ Paul J. Nicoletti*  
NICOLETTI LAW, PLC  
Paul Nicoletti (P-44419)  
33717 Woodward Avenue, #433  
Birmingham, MI 48009  
Email: pauljnicoletti@gmail.com

ATTORNEY FOR PLAINTIFF  
COUNTRYMAN NEVADA, LLC