

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

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MALIBU MEDIA, LLC,	:	
	:	
	:	Civil Action No. <u>1:14-cv-00707-TSB</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
AUSTEN DOWNS,	:	
	:	
Defendant.	:	
	:	
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**DECLARATION OF YOUSEF FARONIYA IN SUPPORT OF PLAINTIFF'S
RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE [CM/ECF 17]**

I, YOUSEF FARONIYA, DO HEREBY DECLARE:

1. I am over the age of 18 and have personal knowledge of the facts set forth herein.
2. I was responsible for filing the affidavit of service and should have done so when I received it.
3. I was also responsible for filing the Motion for Default Judgment and failed to properly calendar the Court's deadline.
4. I did not intend to cause the Court to perform unnecessary work or to prejudice the Defendant in any way.
5. My client and I sincerely apologize.
6. In order to avoid causing the Court to perform additional unnecessary work on this matter, a Notice of Voluntary Dismissal With Prejudice is being filed contemporaneously herewith.

7. In an effort to ensure no further mistakes occur and as a direct result of Your Honor's two show cause orders, I hired a paralegal to help me organize my files and manage these matters.

8. Your Honor, please know I will use my best efforts to ensure no further mistakes occur.

Dated: June 9, 2015

Respectfully submitted,

YMF, INC.: The Law Office of Yousef M. Faroniya

/s/ Yousef M. Faroniya

Yousef M Faroniya

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

/s/ Yousef M. Faroniya