

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

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MALIBU MEDIA, LLC,	:	
	:	
	:	Civil Action No. <u>1:14-cv-00718-TSB</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
RYAN RAMSEY,	:	
	:	
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 15]**

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. The dates and facts set forth in the motion to enlarge the 4(m) deadline [CM/ECF 9] and the Response to Order to Show Cause [CM/ECF 14] are unfortunately erroneous.
3. The affidavit of service was received via U.S. mail by me on February 4, 2015. I was responsible for filing the affidavit of service and should have done so when I received it.
4. I made two mistakes regarding the affidavit of service: (a) I did not file it immediately, and (b) I did not notate that the affidavit had been received in my case file.
5. As a result of these two mistakes, I sincerely believed that the process server had not sent me a copy of the affidavit of service prior to my filing the motion to enlarge and that the facts stated in the response to the show cause were true when it was filed.
6. I did not intend to cause the Court to perform unnecessary work or to prejudice the Defendant in any way.

7. My client and I sincerely apologize.

8. 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.

9. 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.

10. 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