

**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”)¹ 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

Jason E. Sweet (BBO# 668596)
Email: jsweet@boothsweet.com
BOOTH SWEET LLP
32R Essex Street
Cambridge, MA 02139
Tel.: (617) 250-8602
Fax: (617) 250-8883

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.

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2013, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be served via first-class mail to those indicated as non-registered participants.

/s/ Jason Sweet

Jason E. Sweet