

undersigned's message or email until 12:53 P.M. today. John Doe 16's counsel did not address the readability of either hard drive. Instead, John Doe 16's counsel's email states that his client will challenge the substance of Patrick Paige's declaration.

As stated in Plaintiff's Notice of Filing Declaration of Patrick Paige and Plaintiff's Notice of its Intention to File a Motion for Sanctions based Upon John Doe 16's Intentional Fabrication of Evidence and Scheme to Defraud Plaintiff and this Court, Plaintiff's motion for sanctions will be filed as soon as is possible.

Dated: May 20, 2013

Respectfully submitted,

By: /s/ M. Keith Lipscomb
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of May, 2013, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF and on all of those parties receiving electronic notification via the Court's CM/ECF electronic filing.

By: /s/ M. Keith Lipscomb
M. Keith Lipscomb