

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PATRICK COLLINS, INC.  
DBA ELEGANT ANGEL  
8015 Deering Ave  
Canoga Park, CA 91304,

No. 12-cv-3507 (BSJ)

Plaintiff,

**NOTICE OF  
MOTION**

-against-

DOES 1-45,

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed affidavit of Morlan Ty Rogers, Esq., the annexed Declaration of Doe No. 41 and the exhibits annexed hereto, the accompanying Memorandum of Law, and all prior papers and proceedings herein, the undersigned hereby moves before the Honorable Barbara S. Jones, United States District Judge, in Courtroom 17C of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order (a) pursuant to Rules 20(a) and 21 of the Federal Rules of Civil Procedure, severing and dismissing the action as to defendants Doe Nos. 2 through 45 on the ground that plaintiff Patrick Collins, Inc. dba Elegant Angel improperly joined said defendants in this action, (b) pursuant to Rule 45(c)(3) of the Federal Rules of Civil Procedure, quashing the subpoenas issued under the Court's May 16, 2012 *ex parte* discovery order seeking disclosure of the identities of defendants Doe Nos. 2 through 45, and (c) granting such other and further relief as may be just and proper.

PLEASE TAKE FURTHER NOTICE that opposing affidavits and memoranda of law, if any, must be served and filed with the Court on or before August 6, 2012. Unless such affidavits and memoranda of law are timely served and filed, the relief sought herein may be granted.

Dated: Forest Hills, New York  
July 23, 2012

RAY BECKERMAN, P.C.

By: s/Morlan Ty Rogers  
Morlan Ty Rogers (MR 3818)  
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