UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO

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K-BEECH, INC.,

Civil Action No. 1:11-cy-00487

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Plaintiff,

vs. :

JOHN DOES 1-48,

: The Simpson Law Office, Inc.
: 405 North Huron, Suite 200

Defendants. :

Toledo, Ohio 43604 Tel: 419-243-7225

Fax: 419-242-0463

Jeff Simpson (0080376)

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## EMERGENCY MOTION TO PRESERVE DATA PENDING MOTION FOR LEAVE TO SERVE THIRD PARTY SUBPOENAS PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, Patrick Collins, Inc., by and through undersigned counsel, moves for the entry of an order pursuant to Rules 26(b)(2)(C) and 34(c) to preserve data pending the court's ruling on Plaintiff's Motion For Leave To Serve Third Party Subpoenas Prior To Rule 26(f) Conference. In support of this Motion, Plaintiff presents the attached Memorandum of Law.

Dated: September 1, 2011

Respectfully submitted,

By: /s/ Jeff Simpson

Jeff Simpson (0080376) Attorney for Plaintiff

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