

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MALIBU MEDIA, LLC
Plaintiff

v.

JOHN DOES 1 – 14,
Defendants

Civil No.: 2:12-cv-02084-MMB

Hon. Michael M. Baylson

COMES NOW Defendant John Doe 6, by and through counsel, and pursuant to Federal Rule of Civil Procedure 11, moves the Court to sanction Plaintiff's counsel, Chris Fiore, Esquire, and M. Kieth Lipscomb, Esquire for the reasons set forth Defendant's Brief in Support of Motion for Sanctions, filed contemporaneously herewith.

WHEREFORE, Defendant John Doe 6 prays that the Court enter an order granting the requested relief.

Dated this first day of November, 2012.

/S/ CHARLES THOMAS, JR.
Charles Thomas, Jr., Esq.
Attorney for John Doe 6

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he filed the foregoing Motion to Quash and/or Sever on November 1, 2012 via the Court's CM/ECF filing system, thereby serving all parties of record.

Respectfully submitted,

/S/ CHARLES THOMAS, JR.
Charles Thomas, Jr., Esq.

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PROPOSED FORM OF ORDER

AND NOW, this _____ day of November, 2012, it is hereby ORDERED that Plaintiff's counsel, Chris Fiore, Esquire and M. Kieth Kipscomb, Esquire are SANCTIONED by the Court for the reasons set forth in Defendant John Doe 6's Motion and Brief.

It is further ORDERED that Plaintiff's counsel shall pay Defendant's attorney fees. Defense counsel shall provide an itemized bill to the Court.

BY THE COURT,

MICHAEL M. BAYLSON
United States District Judge