

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

AF HOLDINGS, LLC,	)	
	)	
Plaintiff,	)	Civil Action No. 3:12-cv-01401 (JBA)
	)	
v.	)	
	)	
ELLIOT OLIVAS,	)	
	)	
Defendant.	)	

**DEFENDANT’S REQUEST FOR A SPECIAL FINDING AGAINST PLAINTIFF  
PURSUANT TO CONN. GEN. STAT. § 52-226a**

The Clerk entered judgment dismissing Plaintiff AF Holdings, LLC’s (“Plaintiff”) complaint against Defendant Elliot Olivas (“Olivas”) on February 13, 2015. Doc. 45. Olivas intends to pursue a vexatious litigation claim against Plaintiff and its counsel (namely John Steele, Paul Hansmeier, and Paul Duffy) pursuant to Conn. Gen. Stat. § 52-568. To support that cause of action, Olivas hereby requests that the Court make a special finding pursuant to Conn. Gen. Stat. § 52-226a, to be incorporated in the judgment or made a part of the record, that Plaintiff’s action, or any of its counts, was without merit and was not brought in good faith.

A memorandum in support of this request is attached.

Dated: February 20, 2015

Respectfully,

/s/ Jason E. Sweet

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**CERTIFICATE OF SERVICE**

I hereby certify that on this February 23, 2015, I electronically filed the foregoing document and its supporting memorandum, by using the Court's ECF system.

As Plaintiff's counsel has withdrawn without substitution, paper copies will be served via first-class mail on February 23, 2015 to Plaintiff, c/o Mark Lutz, its ostensible owner, at his last known address (910 West Avenue #1014, Miami Beach, FL 33139).

Paper copies will also be sent via first-class mail on February 23, 2015 to movant John Steele, at his address listed on the docket in this action (1111 Lincoln Road, Suite 400, Miami Beach, FL 33139) and electronic copies will be sent to his e-mail address listed on the docket of *Lightspeed Media Corp. v. Smith*, No. 3:12-cv-00089 (S.D. Ill.): [jlsteele@wefightpiracy.com](mailto:jlsteele@wefightpiracy.com).

Paper and electronic copies will also be sent via first-class mail and e-mail on February 23, 2015 to Plaintiff's other attorney Paul Hansmeier, at his addresses listed on the docket in *AF Holdings, LLC v. Doe*, 12-cv-01445 (D. Minn.): Class Action Justice Institute LLC, 40 South 7th Street, Suite 212-313, Minneapolis, MN 55402, [mail@classjustice.org](mailto:mail@classjustice.org).

Paper and electronic copies will also be sent via first-class mail and e-mail on February 23, 2015 to Plaintiff's other attorney Paul Duffy, at his addresses listed on the docket in both *AF Holdings, LLC v. Does*, No. 12-cv-00048 (D.D.C.) and *Lightspeed Media Corp. v. Smith*, No. 3:12-cv-00089 (S.D. Ill.): Prenda Law, Inc., 161 N. Clark Street Suite 3200, Chicago, IL 60601, [paduffy@wefightpiracy.com](mailto:paduffy@wefightpiracy.com).

/s/ Jason E. Sweet