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Attorneys for Defendant, AZOOGLEADS.COM, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KRONENBERGER BURGOYNE, LLP
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ASIS INTERNET SERVICES, a California corporation,

Plaintiff,

vs.

OPTIN GLOBAL, INC., a Delaware Corporation, also dba Vision Media Limited Corp., USA Lenders Network, USA Lenders, and USA Debt Consolidation Service; et al.,

Defendants.

Case No. C-05-5124 JCS

AZOOGLEADS.COM, INC.'S NOTICE OF MOTION AND MOTION FOR SANCTIONS

Date: June 20, 2008
Time: 1:30 AM
Ctm: A, 15th Floor

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on June 20, 2008 at 1:30 a.m., or as soon
3 thereafter as this matter may be heard in Department A of the above-entitled Court,
4 located at 450 Golden Gate Avenue, San Francisco, California, 94102, Defendant
5 AzoogLeads.com, Inc. ("AzoogLeads") will move the Court to impose sanctions on Plaintiff
6 ASIS Internet Services ("ASIS") and its counsel of record, the Singleton Law Group
7 ("Singleton"), in the amount of \$912,413.84, or such portion of this sum as the Court
8 believes is equitable and just.

9 This motion is made pursuant to 15 U.S.C. §7706(g)(4), 28 U.S.C. §1927, and
10 Federal Rule of Civil Procedure 11, all of which permit the Court to exercise its authority
11 to order monetary sanctions in the form of attorneys' fees. Monetary sanctions are
12 appropriate in this case because ASIS and Singleton filed the Second Amended
13 Complaint without evidentiary support for its allegations, pursued the litigation for a year-
14 and-a-half even when no evidentiary support was discovered, and engaged in frivolous
15 and abusive litigation and discovery tactics throughout the course of the case.

16 This Motion is based on this Notice, the Memorandum of Points and Authorities,
17 the declarations of Henry M. Burgoyne, III and Stephen Fox in support of this Motion, the
18 proposed order, and any additional evidence and argument that the Court may receive
19 at or before the hearing on this Motion.

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Dated: May 13, 2008

Henry M. Burgoyne, III
Karl S. Kronenberger
Jeffrey M. Rosenfeld
Margarita Calpotura
Kronenberger Burgoyne, LLP

By: _____ /s/
Henry M. Burgoyne, III

Attorneys for Defendant,
AZOOGLEADS.COM, INC.

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