UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

AF HOLDINGS LLC,	CASE Nos. 12-cv-1445 (JNE/FLN)
	12-cv-1446 (JNE/FLN)
Plaintiff,	12-cv-1447 (JNE/FLN)
	12-cv-1448 (JNE/FLN)
v.	12-cv-1449 (JNE/FLN)
JOHN DOE,	Judge: Hon. Joan N. Ericksen
Defendant.	Magistrate Judge: Hon. Franklin L. Noel

OBJECTIONS OF AF HOLDINGS, LLC TO THE MAGISTRATE JUDGE'S JULY 15, 2013 ORDERS

AF Holdings, LLC, respectfully objects to the orders entered by the Magistrate Judge in the above-captioned cases on July 15, 2013. The reasons why this Court should sustain AF Holdings' objections are: (1) the Magistrate Judge lacks the Constitutional and statutory authority to *sua sponte* reopen a case; (2) even if the Magistrate Judge possessed such authority, he has not properly exercised it here—a proceeding under Fed. R. Civ. P. 11 may only be initiated via a show-cause order (and none was issued here) and Fed. R. Civ. P. 60 may only be invoked by a district court after notice and an opportunity to be heard (and none was provided here); (3) a case voluntarily dismissed under Fed. R. Civ. P. 41(a)(1) may not be reopened under Fed. R. Civ. P. 60, *White v. Nat'l Football League*, 2013 WL 656682 at *3 (D. Minn. Feb. 22, 2013) (adopting the reasoning of two unreported Eight Circuit cases holding that a notice of voluntary dismissal under Rule 41(a)(1) is not a "final judgment, order, or proceeding" that may be subject to Rule 60(b) relief); and (4) for the reasons set forth in Paul Duffy's forthcoming

objections and memorandum of law in support thereof, the Alan Cooper repudiation lacks

credibility and—due, *inter alia*, to the nature in which Mr. Cooper was recruited by his

attorney, Paul Godfread, to attack Plaintiff in cases nationwide—bears indicia of fraud on

the Court.

                         Respectfully submitted,

DATED: July 29, 2013   By: _____/s/ Paul Hansmeier_____
                          Paul R. Hansmeier (MN Bar #387795)
                          CLASS ACTION JUSTICE INSTITUTE, LLC
                          40 South 7th Street
                          Suite 212-313
                          Minneapolis, MN 55402
                          Telephone: (612) 234-5744
                          mail@classjustice.org
                          Attorney for Plaintiff