UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY OWENSBORO DIVISION

FORBA HOLDINGS, LLC,	
Plaintiff,	
v.) Civil Action No. 4:08-cv-00137-JHM-ERG
DEBBIE HAGAN,	
Defendant.	

MOTION FOR HEARING ON PLAINTIFF MOTION FOR SANCTIONS DUE TO DEFENDANT'S VIOLATION OF CONSENT INJUNCTION

The plaintiff, FORBA Holdings, LLC ("FORBA"), pursuant to LR 7.1(f), respectfully moves this Court to schedule a hearing on Plaintiff's Motion for Sanctions Due to Defendant's Violation of Consent Injunction or, in the alternative, to enter an order requiring Defendant to show cause why she should not be sanctioned for her violations of the Consent Injunction entered on November 17, 2008 [Docket Entry No. 11].

Respectfully submitted,

/s/ Jonathan D. Rose

Thor Y. Urness (admitted *pro hac vice*)
Jonathan D. Rose (Ky. Bar No. 88547)
BOULT, CUMMINGS, CONNERS & BERRY, PLC
1600 Division Street, Suite 700
P.O. Box 340025
Nashville, Tennessee 37203
(615) 252-2308

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Hearing on Plaintiff's Motion for Sanctions Due to Defendant's Violation of Consent Injunction is being served via first class U.S. Mail, postage prepaid on this the 23rd day of December, 2008, to the following:

Debbie Hagan 4453 Strickland Drive Owensboro, KY 42301-6519

> /s/ Jonathan D. Rose Jonathan D. Rose