

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**REGIONAL MULTIPLE LISTING
SERVICE OF MINNESOTA, INC.,
d/b/a NORTHSTARMLS**

Plaintiff,

v.

**AMERICAN HOME REALTY
NETWORK, INC.**

Defendant.

Civil No. 12-cv-00965-JRT-FLN

**MOTION FOR CONTEMPT FOR
VIOLATIONS OF PRELIMINARY
INJUNCTION**

Plaintiff Regional Multiple Listing Service of Minnesota, Inc., d/b/a NorthstarMLS (“RMLS”) hereby moves the Court for a finding of contempt against Defendant American Home Realty Network, Inc. (“AHRN” and its Chief Executive Officer Jonathan Cardella (“Cardella”) for violations of the Court’s September 27, 2012 Preliminary Injunction Order. RMLS further moves the Court for imposition of a civil fine against AHRN and Cardella, to be paid to RMLS as compensation for the harm caused by their actions, and for an award RMLS costs and fees incurred in bringing this motion. RMLS also moves the Court to impose against AHRN and Cardella a daily fine, to be paid to the Court, unless and until they comply with the Court’s September 27, 2012 Preliminary Injunction Order and remove from the *neighborcity.com* website all of RMLS’s copyrighted photographs, agent remarks, and public remarks.

The motion is based on the pleadings, court file, Plaintiff’s accompanying memorandum of law and related declarations and exhibits, and the argument of counsel.

Dated: November 15, 2012

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