
**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 1:12-cv-00845-TWP-MJD

ANDREW LEIGHTNER, KEVIN DEMPSEY,
KENNETH REESE, CARL RUDY, LUCAS
SHULTZ, LUCIAN SAVULESCU, DAN
COROIAN, JIM GENDRON, JEREMY
COTTON, NEVILLE FERNANDES, DANIEL
PITTMAN, JAY GARRETT, JERRY RICHEY
CONNIE FELONGCO, TERESA
STEPHENSON, KIRAN POULSEN, CHRIS
MINOR, SIWEI LI, DERICK BROOKS,
CLARISSA HENDERSHOT and JOHN DOES
14, 16, 17, 20, 23, 24 and 29.

Defendants.

MOTION FOR ENTRY OF CLERK'S DEFAULT
PURSUANT TO FED.R.CIV.P 55(a)

Pursuant to Fed.R.Civ.P. 55(a), Plaintiff moves for the entry of a default against Defendants, Lucian Savulescu, Dan Coroian, Jeremy Cotton and Connie Felongco for failing to plead or otherwise defend this action as required by law. Attached hereto as Exhibit A is the Declaration in Support of Request for Entry of Default. Attached hereto as Exhibit B is the proposed Entry of Default.

Dated: January 9, 2013

Respectfully submitted,

By: /s/ Paul J. Nicoletti
Paul J. Nicoletti

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2013, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document via U.S. Mail to the persons set forth in the Service List below.

By: /s/ Paul J. Nicoletti
Paul J. Nicoletti

Service List

Lucian Savulescu
4591 Matthew Street
West Lafayette, Indiana 47906

Dan Coroian
2061 Malibu Drive
West Lafayette, Indiana 47906

Jeremy Cotton
5229 W. 300 S.
Russiaville, Indiana 46979

Connie Felongco
712 Ranike Drive, Apt. 1
Anderson, Indian 46012