

NSAHLAI LAW FIRM
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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Jane Doe, individually, and on behalf
of all others similarly situated;
DOES plaintiffs 1 through 1000,

Plaintiffs,

vs.

CHRISTOPHER ANU FOBENEH
a.k.a CHRIS ANU, an individual; and
DOES 1 through 5000.
Defendants.

Case No.: 2:19-cv-00995-R-SKx

**APPLICATION TO CLERK
FOR ENTRY OF DEFAULT
AGAINST DEFENDANTS**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 12, 2019, I directed that the foregoing document be electronically filed with the Clerk of the Court by using the CM/ECF system, and

[X] (By U.S. Mail) I deposited such envelope in the mail at Los Angeles, CA on March 12, 2019 with postage thereon fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Defendant,

CHRISTOPHER ANU FOBENEH
3354 Rogerdale Rd Apt. 224
Houston, TX 77042-5027

By: /S/
EMMANUEL NSAHLAI

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Defendants.

Case No.: 2:19-cv-00995-R-SKx

**DECLARATION OF
EMMANUEL NSAHLAI IN
SUPPORT OF APPLICATION
TO CLERK FOR ENTRY OF
DEFAULT AGAINST
DEFENDANT CHRISTOPHER
ANU FOBENEH A.K.A. CHRIS
ANU**

§-1-

Jane Doe v. CHRISTOPHER ANU FOBENEH

Case .No. 2:19-cv-00995-R-SKx

Declaration of Emmanuel Nsahlai in Support of the Application for Entry of Default against
Defendants

DECLARATION OF EMMANUEL NSSAHLAI

I, Emmanuel Nsahlai, declare as follows:

1. I am local counsel for plaintiff Jane Doe. The facts stated below are true based upon my personal knowledge.
2. Defendant Christopher Anu Fobeneh was served pursuant to Rule 5(b)(2)(A) of the Federal Rules of Civil Procedure on February 12, 2018, as evidenced by the proof of service on file with this Court document number 9.
3. Under Rule 12, defendant Christopher Anu Fobeneh was required to plead or otherwise respond to the complaint by March 5, 2019. The time to plead or otherwise respond to the complaint has not been extended by any agreement of the parties or any order of the Court.
4. Defendant Christopher Anu Fobeneh has failed to serve or file a pleading or otherwise respond to the complaint. The applicable time limit for responding to the complaint has expired.
5. Defendant Christopher Anu Fobeneh is not a minor or an incompetent person.
6. Defendant Christopher Anu Fobeneh is not currently in the military service, and therefore the Service members Civil Relief Act does not apply.
7. Attached to this declaration as Exhibit A is a true and correct copy of the proof of service on file with this Court for the defendant Christopher Anu Fobeneh.

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Defendant,

CHRISTOPHER ANU FOBENEH
3354 Rogerdale Rd Apt. 224
Houston, TX 77042-5027

By: /S/
EMMANUEL NSAHLAI

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EXHIBIT A

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

Jane Doe, individually, and on behalf of all others
similarly situated; DOES plaintiffs 1 through 1000

Plaintiff(s)

v.

CHRISTOPHER ANU FOBENEH a.k.a CHRIS ANU,
an individual; and DOES 1 through 5000.

Defendant(s)

Civil Action No. 2:19-cv-00995-R-SKx

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CHRISTOPHER ANU FOBENEH
3354 Rogerdale Rd Apt. 224
Houston, TX 77042-5027

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

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If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Carmen Rujan

Signature of Clerk or Deputy Clerk



Date: 02/11/2019

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:19-cv-00995-R-SKx

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (name of individual and title, if any) Christopher Anu Fobeneh.
was received by me on (date) 2/11/19

☒ I personally served the summons on the individual at (place) 3354 Rogerdale Rd
Apt # 224, Houston, Texas 77042 on (date) 2/12/19; or

☐ I left the summons at the individual's residence or usual place of abode with (name) _____,
a person of suitable age and discretion who resides there,
on (date) _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on (name of individual) _____, who is
designated by law to accept service of process on behalf of (name of organization) _____
on (date) _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 2/13/19

Christina Edwards
Server's signature
Christina Edwards
Printed name and title

950 Leadenhall Cir Channelview, TX 77530
Server's address

Additional information regarding attempted service, etc:

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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Jane Doe, individually, and on behalf
of all others similarly situated;
DOES plaintiffs 1 through 1000,

Plaintiffs,

vs.

CHRISTOPHER ANU FOBENEH
a.k.a CHRIS ANU, an individual; and
DOES 1 through 5000.
Defendants.

Case No.: 2:19-cv-00995-R-SKx

**[PROPOSED] ENTRY OF
DEFAULT AGAINST
DEFENDANT CHRISTOPHER
ANU FOBENEH A.K.A CHRIS
ANU**

1 It appearing from the records in the above-entitled action that the Summons
2 and Complaint for this case have been served upon the defendants named below, and
3 it further appearing from the declaration of counsel for Plaintiff and other evidence
4 that defendant Christopher Anu Fobeneh has failed to plead or otherwise defend this
5 action as directed in said Summons and as provided in the Federal Rules of Civil
6 Procedure:
7

8 Now, therefore, on request of counsel, the DEFAULT of Christopher Anu
9 Fobeneh a.k.a. Chris Anu is hereby entered:
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13 Date: March _____, 2019
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17 By:
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19 _____
20 Clerk of the Court
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CERTIFICATE OF SERVICE

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[X] (By U.S. Mail) I deposited such envelope in the mail at Los Angeles, CA on March 12, 2019 with postage thereon fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Defendant,

CHRISTOPHER ANU FOBENEH
3354 Rogerdale Rd Apt. 224
Houston, TX 77042-5027

By: /S/
EMMANUEL NSAHLAI

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