

1 NSAHLAI LAW FIRM
EMMANUEL NSAHLAI, SBN (207588)
2 Email: nsahlai.e@nsahlailawfirm.com
3 3250 WILSHIRE BLVD, STE 1500
LOS ANGELES, CA 90010
4 Tel : (213) 797-0369
5 Fax : (213) 973-4617

6 Attorney for Plaintiffs

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

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

13 Plaintiffs, §

14 vs. §

15 CHRISTOPHER ANU FOBENEH §
16 a.k.a CHRIS ANU, an individual; and §
17 DOES 1 through 5000. §
18 Defendants. §

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

13 **APPLICATION TO CLERK**
14 **FOR ENTRY OF DEFAULT**
15 **AGAINST DEFENDANTS**

1 **To the Clerk of the United States District Court for the Central District of**
2 **California:**

3 Pursuant to Rule 55 of the Federal Rules of Civil Procedure, Plaintiff Jane Doe
4 requests that the Clerk enter the default of Defendant Christopher Anu Fobeneh, an
5 individual, for failure to plead or otherwise defend against this action in a timely
6 manner.
7

8 As evidenced by the proofs of service on file with this Court, the above-named
9 defendants were each served pursuant to personal delivery to defendant Christopher
10 Anu Fobeneh in his individual capacity on February 12, 2019.
11

12 The applicable time limit for the above-named Defendants to appear or
13 otherwise respond to this action expired on March 6, 2019. Accordingly, as set forth
14 in the concurrently filed Declaration of Emmanuel Nsahlai and its attached Exhibits 1
15 through 2, default should be entered against the above named defendant.
16
17

18
19 Date: March 12, 2019

Respectfully Submitted,

EMMANUEL NSAHLAI

21 By: _____/S/
22 NSAHLAI LAW FIRM

23 EMMANUEL NSAHLAI, SBN (207588)
24 email: nsahlai.e@nsahlailawfirm.com
25 3250 WILSHIRE BLVD, STE 1500
26 LOS ANGELES, CA 90010

27 Attorney for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28