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 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN JOSE DIVISION
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15 ZYNGA GAME NETWORK INC., a Delaware
 Corporation,
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 17 Plaintiff,
 18 v.
 19 JASON WILLIAMS, an individual, LUNA
 MARTINI, an individual, WAN-WEN KUO, an
 20 individual, and JOHN DOES 4-5 D/B/A MW
 GROUP
 21 Defendants.
 22

CASE NO. CV-10:01022 JF (PSGx)

**PLAINTIFF'S REQUEST FOR ENTRY OF
 DEFAULT BY THE CLERK AGAINST
 DEFENDANTS JASON WILLIAMS, LUNA
 MARTINI AND WAN-WEN KUO**

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To the Clerk of Court:

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff ZYNGA INC. (“Plaintiff”) moves for entry of default judgment against defendants (1) Jason Williams; (2) Luna Martini; and (3) Wan-Wen Kuo (collectively, “Defendants”) for failure to answer or otherwise plead to the First Amended Complaint. In support of this Motion, Plaintiff states as follows:

1. Plaintiff commenced this action on March 10, 2010, by filing a Complaint against defendants Jason Williams, Luna Martini and John Does 1-5 DBA MW Group in the United States District Court for the Northern District of California.

2. Plaintiff filed its First Amended Complaint on September 7, 2010 against defendants Jason Williams, Luna Martini, Wan-Wen Kuo and John Does 2-5 DBA MW Group.

3. The Defendants were served with a Summons and a copy of the First Amended Complaint by electronic mail on March 28, 2011, pursuant to the Court’s March 24, 2011 Order Authorizing Plaintiff to Serve Defendants by Electronic Mail. *See* Proof of Service, Docket No. 36; Order Authorizing Plaintiff to Serve Defendants by Electronic Mail, Docket No 35.

4. Pursuant to the Court’s March 24, 2011 Order Authorizing Plaintiff to Serve Defendants by Electronic Mail, the Defendants were required to serve an answer or otherwise plead to the First Amended Complaint on or before April 18, 2011. *See* Order Authorizing Plaintiff to Serve Defendants by Electronic Mail, Docket No 35.

5. To date, the Defendants have not served an answer or any other responsive pleading to the First Amended Complaint, nor has any counsel of record made an appearance on the Defendants’ behalf.

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1 6. Federal Rule of Civil Procedure 55(a) provides that “[w]hen a party against whom a
2 judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by these
3 rules and that fact is made to appear by affidavit or otherwise, the clerk shall enter the party’s
4 default.”

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6 WHEREFORE, Plaintiff respectfully requests that the Clerk of the above-entitled Court enter
7 default in this matter against the Defendants.

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9 Dated: April 22, 2011

By: _____ /s/

David K. Caplan
Keats McFarland & Wilson LLP
Attorneys for Plaintiff
ZYNGA INC.