

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

TITLECRAFT, INC.,

Plaintiff and
Counterclaim Defendant,

v.

NATIONAL FOOTBALL LEAGUE and
NFL PROPERTIES, LLC,

Defendants and
Counterclaim Plaintiffs.

No. 0:10-cv-00758-RHK-JJK

**DEFENDANTS/COUNTERCLAIM
PLAINTIFFS NATIONAL FOOTBALL
LEAGUE and NFL PROPERTIES
LLC'S APPLICATION FOR ENTRY
OF DEFAULT**

Defendants and Counterclaim Plaintiffs National Football League and NFL Properties, LLC (collectively "the NFL"), by and through their attorneys, hereby request the entry of default pursuant to Federal Rule of Civil Procedure 55(a) and LR 7.1 (b), against Plaintiff and Counterclaim Defendant Titlecraft, Inc. ("Titlecraft") for failure to respond or defend against the NFL's counterclaims herein. In support of its application for default, the NFL states as follows:

1. Plaintiff and Counterclaim Defendant Titlecraft, Inc. was served with the NFL's Counterclaims and Answer on June 6, 2010;
2. This Court has jurisdiction over the federal claims asserted herein under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction over all other claims asserted herein under 28

U.S.C. § 1367(a). The matter in controversy exceeds the value of \$75,000, exclusive of interest and costs.

3. Plaintiff and Counterclaim Defendant Titlecraft, Inc. has failed to answer or otherwise respond to the counterclaims herein (*See Declaration of Timothy J. Cruz.*)

WHEREFORE, for the foregoing reasons, the NFL requests that an entry of default be entered against Titlecraft pursuant to Rule 55(a) of the Federal Rules of Civil Procedure

Dated: July 12, 2010

Respectfully submitted,

s/Timothy J. Cruz

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