

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

MARK FAUGHN, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No. 14-CV-00245-BCW
	)	
JPMORGAN CHASE BANK, N.A.,	)	
	)	
Defendant.	)	

**PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT**

COME NOW Plaintiffs, by and through counsel of record, and moves the Court for entry of default judgment against Defendant pursuant to Federal Rule of Civil Procedure 55. In support of their motion, Plaintiffs state as follows:

1. This action was filed on March 13, 2014.
2. Defendant's counsel became aware of this action and began communicating with Plaintiffs' counsel on behalf of Defendant on March 14, 2014. (Exhibit 1, E-mail from Beth Boland to Rick Holtsclaw)
3. On March 14, 2014, Defendant filed its first motion in this case. (Doc. No. 3)
4. On March 25, 2014, J. Loyd Gattis, III entered his appearance on behalf of Defendant. (Doc. No. 14)
5. On March 25, 2014, Defendant filed motions to permit Beth Boland, Rachel Blise, and Stephen Quinlan to appear pro hac vice on behalf of Defendant. Those motions were granted on March 26. (Doc. Nos. 15, 16, 17 and 19)

6. None of Defendants' attorneys entered their appearances for a limited purpose.

(Doc. Nos. 14, 15, 16, and 17)

7. On March 25, Defendants' attorneys participated in a hearing on behalf of Defendant.

8. Seventy-six days have passed between Defendant's first participation in this case, but no Answer to Plaintiffs' Complaint has been filed.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that this Court enter Default Judgment against Defendant.

Respectfully submitted,

/s/ Rick D. Holtsclaw  
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ATTORNEY FOR PLAINTIFFS

#### **CERTIFICATE OF SERVICE**

I certify that on this 29<sup>th</sup> day of May, 2014, I filed the above and foregoing electronically with CM/ECF, which will automatically transmit a copy of this document to Defendant's counsel of record.

/s/ Rick D. Holtsclaw  
Attorney for Plaintiffs