## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MEYER, SUOZZI, ENGLISH & KLEIN, P.C.,

Plaintiff,

-against-

MATHEW K. HIGBEE, Esq., NICK YOUNGSON, RM MEDIA, LTD., and HIGBEE & ASSOCIATES,

Defendants.

**Docket No.: 18-cv-3353 (ADS) (ARC)** 

MOTION FOR DEFAULT JUDGMENT

Plaintiff Meyer, Suozzi, English & Klein, P.C. ("Plaintiff") hereby moves the Court pursuant to Federal Rule of Civil Procedure 55(b) and Local Civil Rule 55.2 to enter default judgment in favor of Plaintiff and against Defendants Nick Youngson and RM Media, Ltd. (together, the "RM Defendants") on the grounds that the RM Defendants failed to answer or otherwise defend against the complaint, and a Certificate of Default has been duly issued by the Clerk of this Court.

Dated: Garden City, New York

March 4, 2019

MEYER, SUOZZI, ENGLISH & KLEIN, P.C. By: /s/
Kevin Schlosser (kschlosser@msek.com)
990 Stewart Avenue, Suite 300
P.O. Box 9194
Garden City, New York 11530-9194
(516) 741-6565

Attorneys for Plaintiff (Pro Se)