

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS; RENEE SUSAN MITCHELL; LOUIS MOORE; MARTIN D. QUATTLEBAUM; MARSHA DYONNE TYLER; MELLISSA LIEBERMAN; EDWARD FRIEDMAN; KENNETH JOHNSON; ROBERT VINCENT ESTRONZA; TAIEF HASSON WALLACE; VANCE HILL; VERNANDO SMITH; ANDRE ANTHONY JONES; FRANK PARSONS; CARLO PONTI SMITH; WILBERT G. PRINCE; MERVIN A. BROWN; ERIC LOPP; JEFFREY L. WATKINS; DENNIS LANE WEAVER; KILO JAMES; TYRONE "PIGGY" SQUIRES; BURRELL DICKERSON; and BRAULIO RIVIERA,

Defendants

Civil Action No. 3:09-CV-0442

Judge Wiseman

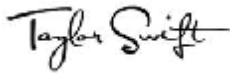
Magistrate Judge Griffin

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT
UNDER FED. R. CIV. P. 55(B)(2), PERMANENT INJUNCTION AND
DESTRUCTION OF COUNTERFEIT GOODS**

The plaintiff, Taylor Swift ("Plaintiff"), by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 55(b)(2), hereby moves that the Court enter a default judgment in the above-captioned action against the defendants Martin D. Quattlebaum, Robert Vincent Estronza, Vance Hill, Vernando Smith, Andre Anthony Jones, Frank Parsons, Wilbert G. Prince, Carlo

Ponti Smith, Mervin A. Brown, Eric Lopp, Jeffrey L. Watkins, Dennis Lance Weaver, Kilo James, Tyrone “Piggy” Squires, Burrell Dickerson, and Braulio Riviera (“Defendants”) and:

1. Pursuant to Section 1116(a) of Title 15 of the U.S. Code, 15 U.S.C. § 1116(a), permanently enjoin and restrain the Defendants, along with their respective partners, associates, agents, servants, employees, representatives and assigns, and all others under their control or in active concert or participation with them, from:

- a. manufacturing, distributing, marketing or selling any unauthorized merchandise or products bearing any photograph, image or likeness of Plaintiff, or any marks, words, names, designs and/or symbols that are identical or confusingly similar to, or are counterfeits of, Plaintiff’s trademarks TAYLOR SWIFT,  and FEARLESS, collectively referred to as “Plaintiff’s Trademarks” (“Counterfeit Goods”);
- b. representing by any method, directly or indirectly, that any Counterfeit Goods, any actions of Defendants or Defendants themselves are sponsored, endorsed or authorized by, or affiliated with, Plaintiff; and
- c. otherwise taking any action or engaging in any conduct that tends falsely to represent, or is likely to confuse, mislead or deceive purchasers and/or members of the public to believe, that any actions of Defendants, any products sold by Defendants, and/or Defendants themselves are connected with Plaintiff, are sponsored, approved or licensed by Plaintiff, and/or are affiliated with Plaintiff.

2. Order, pursuant to Section 1118 of Title 15 of the U.S. Code, 15 U.S.C. § 1118, that any and all Counterfeit Goods seized from Defendants and presently held in the custody of the Court be destroyed by Plaintiff or Plaintiff's agents.

A proposed Order of Default Judgment, Permanent Injunction and Destruction of Counterfeit Goods accompanies this Motion. A Notice of this Motion is being served on the United States Attorney for the Middle District of Tennessee in accordance with 15 U.S.C. § 1118.

Respectfully submitted,

/s/ Natalya L. Rose
W. Michael Milom (No. 002803)
David S. Crow (No. 020699)
Natalya L. Rose (No. 021701)
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Taylor Swift*

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing Plaintiff's Motion for Default Judgment under Fed. R. Civ. P. 55(b)(2), Permanent Injunction and Destruction of Counterfeit Goods is being accomplished on this 24^h day of September, 2010, through hand-delivery to Jerry E. Martin, U.S. Attorney for the Middle District of Tennessee, 110 Ninth Avenue, South, Suite A961, Nashville, Tennessee 37203, and through delivery by U.S. First Class Mail, postage pre-paid, upon the following:

Martin D. Quattlebaum
8556 Kendrick Road
Jonesboro, Georgia 30126

Robert Vincent Estronza
1281 Brockett Road
Clarkston, Georgia 30021

Vance Hill
6169 Charring Cross Court
Lithonia, Georgia 30058

Vernando Smith
1119 Redantrian Court
Stone Mountain, GA 30088

Andre Anthony Jones
8330 Bluff Road
Columbia, South Carolina 29214

Frank Parsons
1622 Curry Street
Columbia, South Carolina 29204

Wilbert G. Prince
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Carlo Ponti Smith
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/s/ Natalya L. Rose
Natalya L. Rose