

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ENTREPRENEUR MEDIA, INC.,)	
2445 McCabe Way, Suite 400)	
Irvine, California 92614)	Civil Action No. 1:11cv00409
)	(LMB/JFA)
Plaintiff,)	
)	
v.)	
)	
SEATTLEENTREPRENEUR.COM &)	
AUSTINENTREPRENEUR.COM, each an)	
Internet Domain Name,)	
)	
Registrant:)	
Oleg Nevzorov)	
Molotova-23)	
Moscow 7789966)	
Russian Federation)	
olegnevzorov@gmail.com)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff Entrepreneur Media, Inc. moves the Court to enter Default Judgment on Plaintiff’s claims under the Lanham Act, 15 U.S.C. § 1125(d), against the Defendant domain names *austinentrepreneur.com* and *seattleentrepreneur.com* (“Infringing Domain Names” or “Defendants”), pursuant to Fed. R. Civ. P. 55(b).

As discussed more fully in Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion for Entry of Default Judgment, Defendants failed to answer or otherwise submit a response to Plaintiff’s Complaint by the deadline set by this Court in its Order of June 8, 2011. Thus, Defendants are in default. On September 19, 2011, Plaintiff submitted a request to the Clerk of the Court to enter a default against Defendant. (Dkt. 11.) The Clerk of the Court

entered the default on September 21, 2011. (Dkt. 12.) As Defendants have defaulted, the well-pled allegations of the Complaint should be deemed admitted, and Plaintiff submits that it is thus entitled to its requested relief. Accordingly, Plaintiff respectfully moves this Court to enter judgment in its favor.

Dated: October 6, 2011

Respectfully submitted,

/s/ Tara Lynn R. Zurawski

Edwin L. Fountain (Va. Bar No. 31918)

Tara Lynn R. Zurawski (Va. Bar No. 73602)

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Counsel for Plaintiff Entrepreneur Media, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2011, I electronically filed the foregoing Plaintiff's Motion for Entry of Default Judgment with the Clerk of the Court using the EC/ECF system and that a true and correct copy of the foregoing and a copy of the Notification of Electronic Filing (NEF) were sent to the following non-filing users by first class mail and electronic mail:

**SEATTLEENTREPRENEUR.COM &
AUSTINENTPRENEUR.COM**, each an Internet
Domain Name,

Registrant:
Oleg Nevzorov
Molotova-23
Moscow 7789966
Russian Federation
olegnevzorov@gmail.com

By: /s/ Tara Lynn R. Zurawski

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