

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

**ENTREPRENEUR MEDIA, INC.,**  
2445 McCabe Way, Suite 400  
Irvine, California 92614

Plaintiff,

v.

**B-ENTREPRENEUR.COM & S-  
ENTREPRENEUR.COM, each an Internet  
Domain Name,**

Registrants:

Pamela Lynn  
2445 McCabe Way, Suite 400  
Irvine, CA 92614  
B-ENTREPRENEUR.COM &

Entrepreneur Inc.  
Verita Powell  
2445 McCabe Way, Suite 400  
Irvine, CA 92614  
S-ENTREPRENEUR.COM

Defendant.

Civil Action No. 1:11-cv-583-AJT-TCB

**AMENDED DECLARATION OF TARA LYNN R. ZURAWSKI  
IN SUPPORT OF REQUEST FOR AN ENTRY OF DEFAULT**

I, Tara Lynn R. Zurawski, pursuant to 28 U.S.C. § 1746(2), declare and state:

1. I am an active member of the Virginia bar and an associate at the law firm of Jones Day.

I am counsel of record for Plaintiff, Entrepreneur Media, Inc. ("EMI"), in the above styled matter and I have personal knowledge of the information set forth below.

2. Plaintiff filed its Complaint against s-entrepreneur.com and b-entrepreneur.com ("Infringing Domain Names" or "Defendants") on May 27, 2011. (Dkt. No. 1.)

3. The registration information provided for b-entrepreneur.com lists “Pamela Lynn” as registrant of that Infringing Domain Name at the same address, and with the same telephone number, as EMI’s. (Dkt. No. 1, Ex. A).

4. The registration information provided for s-entrepreneur.com lists “Verita Powell” as registrant of that Infringing Domain Name at the same address, and with the same telephone number, as EMI’s. (Dkt. No. 1, Ex. A)

5. Neither Pamela Lynn nor Verita Powell have ever been employed by, or in any other manner associated with, EMI, which has no knowledge of anyone with either of those names.

6. Because the registrants of the Infringing Domain Names provided false contact information, Plaintiff could not provide postal notice of the Complaint.

7. Plaintiff sent e-mail notice of the filing of its Complaint in this suit to the registrants of the Infringing Domain Names on June 30, 2011. *See* Exhibit A.

8. The registrants of the Infringing Domain Names have not acknowledged Plaintiff’s notice of the filing of its Complaint in this suit; however, in light of the false contact information provided concerning the registrants of the Infringing Domain Names, Plaintiff has exhausted all possible measures to contact and notify the owners of the Infringing Domain Names.

9. Plaintiff filed a Motion for an Order to Publish Notice of Action (“Motion to Publish”) on August 26, 2011. (Dkt. No. 7.)

10. The Court granted Plaintiff’s Motion to Publish in an Order of Publication dated August 26, 2011 (Dkt. No. 10), whereby the Court required Plaintiff to publish the Order providing notice to the Defendants in *The Washington Times* once within fourteen (14) days after the entry of the Order and to file an affidavit, no later than within twenty-eight (28) days after the entry of the Order, describing the steps Plaintiff has taken to comply with the Order.

11. Plaintiff complied with the Order of Publication by having its Notice of Action in this suit published in *The Washington Times* on September 9, 2011.

12. A declaration describing Plaintiff's compliance with the Order of Publication was filed with the Court on September 21, 2011. (Dkt. No. 11.)

13. The Order of Publication stated that Defendants' answer must be filed with the Court within twenty-one (21) days from the date of publication of the Order in *The Washington Times*. Further, the Court noted in that Order that, if no appearance or pleading is filed as required by the Order, the Court may render judgment against the Infringing Domain Names.

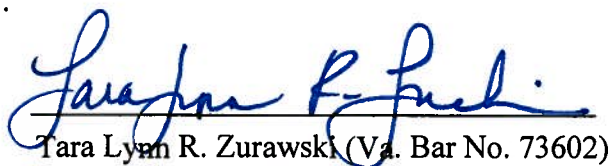
14. In accordance with the Order of Publication, Defendants' answer or other response was due no later than September 30, 2011. No such answer or other response has been filed or served.

15. Defendants are internet domain names and are not infants or incompetent persons.

16. Defendants are internet domain names and are not members of the military and are not subject to the Servicemembers Civil Relief Act.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of November 2011.



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

JONES DAY

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of November, 2011, I will electronically file the foregoing 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 electronic mail:

**REGISTRANTS:**

Pamela Lynn  
B-ENTREPRENEUR.COM  
admin@b-entrepreneur.com

Entrepreneur Inc.  
Verita Powell  
S-ENTREPRENEUR.COM  
admin@s-entrepreneur.com

By:        /s/ Tara Lynn R. Zurawski

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