

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

ENTREPRENEUR MEDIA, INC.,)	
)	
)	Civil Action No. 1:11-cv-583-AJT-TCB
PLAINTIFF,)	
)	
v.)	
)	
B-ENTREPRENEUR.COM & S-)	
ENTREPRENEUR.COM, each an Internet)	
<i>Domain Name,</i>)	
)	
)	
DEFENDANTS.)	
)	
)	

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff Entrepreneur Media, Inc. (hereinafter “Plaintiff”) 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 *b-entrepreneur.com* and *s-entrepreneur.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 August 26, 2011. Thus, Defendants are in default. On October 19, 2011, Plaintiff submitted a request to the Clerk of the Court to enter a default against Defendant. (Dkt. 12.) The Clerk of the Court entered the default on November 15, 2011. (Dkt. 15.) As Defendants have defaulted, the well-pled allegations of Plaintiff’s 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: January 5, 2012

Respectfully submitted,

/s/ Tara Lynn R. Zurawski

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Counsel for Plaintiff Entrepreneur Media, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of January, 2012, 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 electronic mail:

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

Registrants:
Pamela Lynn
2445 McCabe Way, Suite 400
Irvine, CA 92614
admin@b-entrepreneur.com
B-ENTREPRENEUR.COM

Entrepreneur Inc.
Verita Powell
2445 McCabe Way, Suite 400
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By: */s/ Tara Lynn R. Zurawski*

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