

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHARLES M. MURRELL III,

Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,
AND JOHN DOES 1-99,

Defendants.

Civil No. 1:23-cv-11802

**DECLARATION OF ALLEN M. THIGPEN
IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

In support of Plaintiff Charles M. Murrell III's ("Mr. Murrell") Request for Entry of Default Against Defendant Patriot Front, I, Allen M. Thigpen, declare under penalty of perjury the following.

1. I am an attorney with the law firm Foley Hoag LLP and one of the attorneys representing Mr. Murrell in the above-captioned case. I submit this declaration in connection with Mr. Murrell's Request for Entry of Default against Patriot Front.

2. On November 13, 2023, the summons, complaint, and the Court's November 7, 2023 Order allowing Mr. Murrell to proceed with service of Patriot Front by alternative means were served on Patriot Front via two email addresses, patriotfront@protonmail.com and patriotfront01@gmail.com, and via direct message to its account, @PatriotFrontUpdates, on the social media platform Telegram.

3. On November 13, 2023, Mr. Murrell, through counsel, caused a process server to attempt to serve the above-mentioned documents on Patriot Front at its various video-related social media pages on Telegram, Gab, Odysee, and Bitchute. But unlike Patriot Front's primary

Telegram page, @PatriotFrontUpdates, the video-related social media pages do not accept direct messages to allow for service of process.

4. On November 22, 2023, Mr. Murrell, through counsel, filed an Affidavit of Service from his process server affirming the facts set forth above. Doc. No. 21.

5. Patriot Front's answer or other responsive pleading was due on or by December 4, 2023. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

6. As of the date of this filing, according to my review of the docket and diligent observation of my electronic and physical correspondence, Patriot Front has failed to plead or otherwise defend the Complaint in accordance with Fed. R. Civ. P. 12.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of December in Boston, Massachusetts.

/s/ Allen M. Thigpen
Allen M. Thigpen (BBO No. 707799)

CERTIFICATE OF SERVICE

I hereby certify that on the 14th of December, 2023, a true and accurate copy of the foregoing was electronically filed using the CM/ECF system.

/s/ Allen M. Thigpen

Allen M. Thigpen