

**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

**PLAINTIFF CHARLES M. MURRELL III'S REQUEST FOR
CLERK'S ENTRY OF DEFAULT AGAINST DEFENDANT PATRIOT FRONT**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Charles M. Murrell III ("Mr. Murrell"), through undersigned counsel, hereby requests that an Entry of Default be made by the Clerk against Defendant Patriot Front for failure to plead or otherwise defend the Complaint filed on August 8, 2023. Doc. No. 1. As grounds for this request Mr. Murrell states as follows:

1. On November 2, 2023, after many unsuccessful attempts to complete service of process on the defendants through conventional means, Mr. Murrell filed a motion seeking an extension of time to complete service and for leave to serve Patriot Front by alternative means. Doc. No. 16.

2. On November 7, 2023, the Court granted Mr. Murrell's motion, affording him an additional 120 days to complete service of process on each of the defendants, Doc. No. 19, and allowing him to complete service on Patriot Front via email and its social media accounts. Doc. No. 20.

3. Mr. Murrell, through counsel, caused a process server to serve Patriot Front via

email and through direct message to its account on the social media platform, Telegram. Doc. No. 21; *see* Declaration of Allen M. Thigpen (“Thigpen Decl.”) ¶ 2.

4. Patriot Front’s deadline to file an answer or otherwise respond to the Complaint was December 4, 2023. That deadline has passed. Patriot Front has neither appeared nor filed an answer or other responsive pleading. Thigpen Decl. ¶ 6.

WHEREFORE, Mr. Murrell respectfully requests that the Clerk enter Patriot Front’s Default.

Dated: December 14, 2023

Respectfully Submitted,

CHARLES M. MURRELL III

By his attorneys,

/s/ Allen M. Thigpen

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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