

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>SEALED PLAINTIFF 1</b>	)	
	)	
<b>and</b>	)	
	)	
<b>SEALED PLAINTIFF 2,</b>	)	
	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 3:22-cv-00670-MHL</b>
	)	
<b>PATRIOT FRONT, <i>et al.</i>,</b>	)	
	)	
	)	
<b>Defendants.</b>	)	

**DECLARATION OF MICHAEL R. SHEBELSKIE**

I, Michael R. Shebelskie, hereby declare as follows:

1. I am an attorney with the law firm Hunton Andrews Kurth LLP, and I am counsel for Plaintiffs in the above-captioned case.
2. I am a member in good standing of the Bar of the Commonwealth of Virginia and of this Court.
3. I submit this Declaration in support of Plaintiffs’ Request for Clerk’s Entry of Default against Defendants Patriot Front and Thomas Rousseau. This Declaration is based on my personal knowledge of the facts asserted herein.
4. On December 5, 2022, Plaintiffs filed an Amended Complaint, and the Clerk of the Court issued summonses as to Defendants Patriot Front and Thomas Rousseau on December 19, 2022.

5. In accordance with Virginia Code § 8.01-329 and Federal Rules of Civil Procedure 4(e)(1), (h)(1)(A), copies of the Amended Complaint and summonses were served on Defendants Patriot Front and Thomas Rousseau on January 5, 2023 through the Secretary of the Commonwealth of Virginia as their statutory agent.

6. Additionally, copies of the original Complaint with summonses were served on Defendants Patriot Front and Thomas Rousseau by posting them on the front door of Rousseau's home address on December 21, 2022.

7. In accordance with Federal Rule of Civil Procedure 12(a)(1)(A), Defendants' answer or other response was due no later than January 26, 2023.

8. As of this date, no answer or other response to the Amended Complaint against Defendants Patriot Front and Thomas Rousseau has been filed or served.

9. Defendants Patriot Front and Thomas Rousseau are not infants, incompetent, or persons in the military service or otherwise exempt from default judgment under the Servicemembers Civil Relief Act, 50 U.S.C. App. §§ 501–597b.

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

/s/ Michael R. Shebelskie  
Michael R. Shebelskie