UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

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

REQUEST FOR CLERK'S ENTRY OF DEFAULT AGAINST WILLIAM RING

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs, by counsel, respectfully request that the Clerk of the Court enter default against Defendant William Ring ("Defendant" or "Ring") based on his failure to answer, plead, or otherwise defend in this civil action. In support of this request, Plaintiffs state as follows:

- 1. Plaintiffs filed their Complaint against Defendant on October 18, 2022 (ECF No. 1). On December 5, 2022, Plaintiffs filed an Amended Complaint against Defendant (ECF No. 31).
- 2. The Clerk of the Court issued a summons as to Defendant on January 4, 2023 (ECF No. 49).
- 3. On January 12, 2023, Plaintiffs filed the executed summons confirming that Ring was served on January 9, 2023 through personal service on Lt. Mattie at the Fayette County Prison at 12 Court Street, Uniontown, Pennsylvania (ECF No. 54). Ring was an inmate at the Fayette

County Prison at that time (*see* accompanying Shebelskie Decl. ¶ 6), and Lt. Mattie confirmed that she is an agent authorized by appointment to receive service at that address (ECF No. 54).

4. In accordance with Federal Rule of Civil Procedure 12(a)(1(A), Defendant's answer or other response was due no later than January 30, 2023. No such answer or other response has been filed or served (*see* accompanying Shebelskie Decl. ¶ 7).

For the reasons set forth above, Plaintiffs respectfully request that the Clerk of the Court enter default against Defendant William Ring as to all claims asserted by Plaintiffs.

Date: July 24, 2023

Respectfully submitted, SEALED PLAINTIFFS 1 and 2

By: /s/ Michael R. Shebelskie

Michael R. Shebelskie VSB No. 27459 Kevin S. Elliker VSB No. 87498 HUNTON ANDREWS KURTH LLP Riverfront Plaza, East Tower 951 East Byrd Street Richmond, VA 23219-4074 Telephone: (804) 788-8200 Facsimile: (804) 788-8218 mshebelskie@HuntonAK.com kelliker@HuntonAK.com

Edward G. Caspar (admitted pro hac vice) DC Bar No. 1644168
Arthur Ago (admitted pro hac vice) DC Bar No. 463681
LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW
1500 K Street, NW, Suite 900
Washington, DC 20005
Telephone: (202) 662-8600

Telephone: (202) 662-8600 Facsimile: (202) 783-0857 ecaspar@lawyerscommittee.org aago@lawyerscommittee.org Daniel J. Kramer (admitted pro hac vice)
NY Bar No. 1979392
Joshua Hill (admitted pro hac vice)
NY Bar No. 4297826
Gregory F. Laufer (admitted pro hac vice)
NY Bar No. 4614764
Robert J. O'Loughlin (admitted pro hac vice)
NY Bar No. 5225966
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064

Telephone: (212) 373-3000 Facsimile: (212) 492-0441 dkramer@paulweiss.com jhill@paulweiss.com glaufer@paulweiss.com roloughlin@paulweiss.com *Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Plaintiffs' Request for Clerk's Entry of Default Against William Ring was filed on July 24, 2023 through the CM/ECF system and that true and correct copies of this filing and supporting documents were sent by first-class mail, postage prepaid, to the following:

William Ring c/o John Lenkey, Warden Fayette County Prison 12 Court Street Uniontown, PA 15401

and via email:

Bradley P. Marrs (VSB#25281) Marrs & Henry 7202 Glen Forest Drive, Suite 307 Richmond, VA 23226 Tel. (804) 662-5716 Fax (804) 662-5712 bmarrs@marrs-henry.com

Glen K. Allen Glen Allen Law (MD-NA) 5423 Springlake Way Baltimore, MD 21212 Tel: (410) 802-6453 Glenallenlaw@protonmail.com

Counsel for Defendants

/s/ Michael R. Shebelskie

Michael R. Shebelskie VSB No. 27459 HUNTON ANDREWS KURTH LLP Riverfront Plaza, East Tower 951 East Byrd Street Richmond, VA 23219-4074 Telephone: (804) 788-8200 Facsimile: (804) 788-8218 mshebelskie@HuntonAK.com

Counsel for Plaintiffs