

**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.)	

DECLARATION OF MICHAEL R. SHEBELSKIE

I, Michael R. Shebelskie, hereby declare as follows

1. I am an attorney with the law firm of 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 Jacob Brown. 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 issued a summons as to Defendant Jacob Brown on December 19, 2022.

5. In accordance with Federal Rule of Civil Procedure 4(e)(2)(A), a copy of the Amended Complaint and summons was personally served on Defendant Jacob Brown on September 5, 2023 at 61 Woodlot Road, Ridge NY, 11961.

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

7. As of this date, no answer or other response to the Amended Complaint against Defendant Jacob Brown has been filed or served. Nor has he requested or obtained an extension to respond.

8. To the best of my knowledge, Defendant Jacob Brown is not an infant, incompetent, or person in the military service or otherwise exempt from default judgment under Servicemembers Civil Relief Act, 50 U.S.C. App. §§ 501-597b.

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

October 12, 2023

/s/ Michael R. Shebelskie
Michael R. Shebelskie