

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEI TANG)	
)	
Plaintiff,)	Case No. 1:23-cv-16489
)	
v.)	Judge Charles P. Kocoras
)	
THE INDIVIDUALS, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A")	Magistrate Jeannice W. Appenteng
)	
Defendants.)	

PLAINTIFF’S MOTION FOR ENTRY OF CLERK’S DEFAULT

Plaintiff Lei Tang (“Plaintiff” or “Tang”), by and through its undersigned counsel, hereby requests that the Clerk enter default in this matter against the Defendants identified on Schedule “A” to the Complaint numbered 1-27, 29-34, 36-37, 39-40, 42-99, 101-105, 107-115, 117-177 (“Defaulting Defendants”) hereto on the ground that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure.

1. On February 9, February 10, and then February 19, 2024, Defaulting Defendants were served with the Summons and a copy of the Complaint by email communication as authorized by this Court’s Order on Alternate Service. [Doc. 27, 31, 32, 38, 39].

2. The time allowed for Defaulting Defendants to respond to the Complaint has expired. Neither Lei Tang nor the Court has granted the Defaulting Defendants an extension of time to respond to the Complaint. The Defaulting Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of an Answer or other response upon Plaintiff’s attorney of record.

3. Lei Tang is informed and believes that the Defaulting Defendants are not considered infants or incompetent persons. Plaintiff is informed and believes that the Service Members Civil Relief Act does not apply.

WHEREFORE, Plaintiff Lei Tang requests that the Clerk enter default, as authorized by Fed.R.Civ.P. 55(a), against Defendants The Individuals, Partnerships, and Unincorporated Associations Identified on Schedule "A" numbered 1-27, 29-34, 36-37, 39-40, 42-99, 101-105, 107-115, 117-177 and for such other and further relief as the Court deems just and proper.

Respectfully Submitted this 13th of March, 2024,

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