27-CV-16-1712

STATE OF MINNESOTA

COUNTY OF HENNEPIN

Doe 114,

Plaintiff,

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

Court File No.: 27-CV-16-1712 Judge Frank J. Magill, Jr.

PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR DEFAULT JUDGMENT

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Jason McLean,

Defendant.

TO: Defendant Jason McLean, c/o Small Wonder Bar & Cafe, 37 Grand Avenue, Oakland, CA 94612.

NOTICE OF MOTION

PLEASE TAKE NOTICE that Plaintiff Doe 114, by her undersigned counsel, will bring the following motion for default judgment on for hearing before the Honorable Frank Magill, at the Hennepin County Courthouse, at 300 South Sixth Street, Minneapolis, Minnesota, on **October 11, 2017 at 1:00 p.m.**, or as soon thereafter as counsel may be heard.

MOTION

Plaintiff Doe 114 hereby moves the Court pursuant to Rule 55.01 of the Minnesota Rules of Civil Procedure for an order for judgment by default against Defendant Jason McLean for his failure to plead or otherwise defend. This motion is based on the affidavits and exhibits to be served and filed pursuant to the General Rules of Practice for the District Courts for the State of Minnesota, and all of the files and records of the proceedings herein, as well as arguments of counsel at the hearing. Dated: September 11, 2017.

JEFF ANDERSON & ASSOCIATES, P.A.

By: Jeffrey R. Anderson, #2057 Molly K. Burke, #0391477 366 Jackson Street, Suite 100 St. Paul, MN 55101 (651) 227-9990 jeff@andersonadvocates.com molly@andersonadvocates.com

Attorneys for Plaintiff Doe 114