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KELLY, professionally known as
7 IGGY AZALEA

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

11 AMETHYST KELLY, professionally
known as IGGY AZALEA,

12 Plaintiff,

13 vs.

14 PRIMCO MANAGEMENT, INC., et
15 al.,

16 Defendants.

CASE NO. CV-14-7263-BRO-SH
Hon. Beverly Reid O'Connell

**REQUEST TO ENTER DEFAULT
AGAINST DEFENDANTS PRIMCO
MANAGEMENT, INC., ESMG, INC.
AND TOP SAIL PRODUCTIONS,
LLC; DECLARATION OF
STEPHEN D. ROTHSCHILD, ESQ.
(Fed. R. Civ. Proc. 55(a))**

Action Filed: September 17, 2014
Trial Date: None

20 TO: THE CLERK OF THE ABOVE-ENTITLED COURT

21 Plaintiff AMETHYST KELLY, professionally known as IGGY AZALEA
22 ("Plaintiff" or "Azalea"), hereby requests that the Clerk of the above-entitled Court
23 enter default in this matter against defendants PRIMCO MANAGEMENT, INC.
24 ("PRIMCO"), ESMG, INC. ("ESMG"), and TOP SAIL PRODUCTIONS, LLC
25 ("TOP SAIL") (collectively, "Defaulting Defendants") on the grounds that the
26 Defaulting Defendants have each failed to appear or otherwise respond to the
27 Complaint [Docs. #1, 7] within the time prescribed by the Federal Rules of Civil
28 Procedure. Plaintiff personally served the Complaint on PRIMCO on September 22,

1 2014, as evidenced by the proofs of service of summons on file with this Court
2 [Doc. #11]. Plaintiff personally served the Complaint on ESMG and TOP SAIL on
3 September 19, 2014, as evidenced by the proofs of service of summons on file with
4 this Court [Docs. #12, 13].

5 The above stated facts are set forth in the accompanying declaration of
6 Stephen D. Rothschild, Esq., filed herewith.

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8 DATED: October 20, 2014 Respectfully submitted,

9 KING, HOLMES, PATERNO &
10 BERLINER, LLP

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13 By: /s/

14 STEPHEN D. ROTHSCHILD
15 Attorneys for Plaintiff AMETHYST KELLY,
16 professionally known as IGGY AZALEA
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DECLARATION OF STEPHEN D. ROTHSCHILD

I, Stephen D. Rothschild, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with King, Holmes, Paterno & Berliner, LLP, attorneys of record for Plaintiff AMETHYST KELLY, professionally known as IGGY AZALEA ("Plaintiff" or "Azalea"). If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief. This declaration is submitted in support of Plaintiff's Request To Enter Default Against Defendants Primco Management, Inc. ("Primco"), ESMG, Inc. ("ESMG"), and Top Sail Productions, LLC ("Top Sail") (collectively, the "Defaulting Defendants").

2. I have possession of Plaintiff's files relating to this matter, which I have personally reviewed and with which I am personally familiar.

3. As reflected in the Proof of Service filed in this matter on September 26, 2014 (Doc. #11), Primco was served with the Complaint and Summons in this matter on September 22, 2014.

4. As reflected in the Proof of Service filed in this matter on September 26, 2014 (Doc. #12), ESMG was served with the Complaint and Summons in this matter on September 19, 2014.

5. As reflected in the Proof of Service filed in this matter on September 26, 2014 (Doc. #13), Top Sail was served with the Complaint and Summons in this matter on September 19, 2014.

6. As of the date of this Declaration, the Defaulting Defendants have each failed to plead or otherwise defend in this matter within the time permitted by Fed.

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1 R. Civ. P. 12(a)(1)(A)(i).

2 7. None of the Defaulting Defendants is a minor or an incompetent
3 person.

4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed October 20, 2014, at Los Angeles, California.

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/s/

Stephen D. Rothschild

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CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2014, I electronically filed the foregoing **REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS PRIMCO MANAGEMENT, INC., ESMG, INC. AND TOP SAIL PRODUCTIONS, LLC; DECLARATION OF STEPHEN D. ROTHSCHILD, ESQ. (Fed. R. Civ. Proc. 55(a))** with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.



Yvette T. Toko