

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

DISH NETWORK L.L.C.,	§	
	§	
Plaintiff,	§	Civil Action No. 4:17-cv-01618
	§	
v.	§	
	§	
SHAHJAHAN DURRANI, d/b/a ZemTV,	§	
and ADAM LACKMAN, d/b/a	§	
www.tvaddons.ag, www.tvaddons.org,	§	
www.streamingboxes.com, and	§	
www.offshoregit.com	§	
	§	
Defendants.	§	

**Plaintiff DISH Network L.L.C.’s Application for Clerk’s Entry of Default  
Against Defendant Shahjahan Durrani**

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff DISH Network L.L.C. (“DISH”) respectfully requests that the Clerk enter default against Defendant Shahjahan Durrani (“Durrani”) with regard to the allegations in DISH’s first amended complaint (Dkt. 10).

On November 7, 2017, Durrani was personally served with a copy of the summons, DISH’s first amended complaint (Dkt. 10), and Order for Conference and Disclosure of Interested Parties (Dkt. 4), by a person authorized to effect service of Judicial Process according to the laws of England & Wales. (Dkt. 19.) Service in this manner was proper under Fed. R. Civ. P. 4(f)(2).

Durrani filed a motion to dismiss on January 5, 2018. (Dkt. 24.) Durrani’s motion to dismiss was denied on April 19, 2018. (Dkt. 29.) Durrani was required to file a responsive pleading within 14 days of the denial of his motion to dismiss, which was May 3, 2018. *See* Fed. R. Civ. P. 12(a)(4)(A). To date, Durrani has not filed an answer or other responsive pleading or requested additional time to do so. (Declaration of Stephen Ferguson ¶ 3.) Durrani is not a minor, incompetent, or exempt under the Servicemembers’ Civil Relief Act. (*See* Dkt. 24-1, Declaration of Durrani ¶¶ 1-2.) Accordingly, the Clerk should enter default against Durrani.

Dated: May 18, 2018

Respectfully submitted,

**HAGAN NOLL & BOYLE LLC**

By: s/ Stephen M. Ferguson  
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**Counsel for Plaintiff DISH Network L.L.C.**

**Certificate of Service**

I hereby certify that on May 18, 2018, a true and correct copy of the foregoing document was filed electronically with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all CM/ECF participants in this case.

s/ Stephen M. Ferguson  
Stephen M. Ferguson