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Attorneys for Court-Appointed Receiver Peggy Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

MARY MARGARET (PEGGY) HUNT, in
her capacity as court-appointed receiver for
Traffic Monsoon, LLC, and Charles D.
Scoville,

Plaintiff,

v.

IMTIAZ ASLAM, an individual; PIOTR
CHAJKOWSKI, an individual; VINCENT
BOUTIN, an individual; MAURIZIO
LONGO, an individual; ERNEST GANZ, an
individual; DAVID BARKER, an individual;
MOHAMMED YASIN, an individual; ADIL
KHAN, an individual; JAVEDIQBAL
NAEEM, an individual; LIMITED BY
INVITATION, a limited partnership; and
SHARON JAMES, an individual,

Defendants and Class Representatives.

**MOTION FOR ENTRY OF DEFAULT
(MOHAMMED YASIN)**

Case No. 2:19-cv-00275-JNP-CMR
The Honorable Jill N. Parrish

PROPOSED CLASS ACTION

Pursuant to Fed. R. Civ. P. 55(a) and DUCivR 55-1(a), plaintiff Peggy Hunt, the Court-appointed Receiver (the “Receiver”) for all assets of Traffic Monsoon, LLC, and all assets of Charles D. Scoville obtained directly or indirectly from Traffic Monsoon in the case styled as

Securities and Exchange Commission v. Traffic Monsoon, LLC, et al., Case No. 2:16-cv-00832-JNP (D. Utah) (Parrish, J.), by and through counsel, respectfully moves this Court for entry of a default certificate against defendant Mohammed Yasin (“Yasin”). In further support hereof, the Receiver states as follows:

1. On April 22, 2019, the Receiver commenced the above-captioned case by filing the *Complaint* [Docket No. 2] (the “Complaint”).

2. On June 5, 2019, the Court issued a *Summons* to defendant Mohammed Yasin [Docket No. 24] (the “Summons”).

3. On June 18, 2019, at the Receiver’s direction, English process server John Wake served Yasin by leaving copies of the Summons, Complaint, and a “Hague Convention Summary of the Document to be Served and Notice” at the residence of Yasin in Luton, England. *See Affidavit of Service for Summons and Complaint served on Mohammed Yasin on June 20, 2019* [Docket No. 34] (the “Affidavit of Service on Yasin”), p. 2-3.

4. Pursuant to Fed. R. Civ. P. 4(l)(2), the Receiver filed the Affidavit of Service on Yasin on July 17, 2019.

5. As set forth in the Affidavit of Service on Yasin, Yasin was served by a method prescribed by the internal law of England and Wales with a deemed date of service of June 20, 2019, and thus in accordance with Article 5 of the Hague Convention of 15 November 1965 on

the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters and Fed. R. Civ. P. 4(f)(1). *See* Affidavit of Service on Yasin, p. 1-3.

6. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), the deadline for Yasin to answer or respond to the Complaint and Summons was July 11, 2019.

7. Yasin has not appeared, answered, or otherwise responded to the Complaint and Summons.

WHEREFORE, the Receiver respectfully requests the Clerk enter a default certificate against Yasin in the form attached hereto as **Exhibit A**.

DATED this 19th day of July, 2019.

DORSEY & WHITNEY LLP

/s/ John J. Wiest

Milo Steven Marsden

Michael F. Thomson

Sarah Goldberg

John J. Wiest

Attorneys for Receiver Peggy Hunt

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record in this case.

/s/ John J. Wiest

Exhibit A

Prepared and submitted by:

Milo Steven Marsden (Utah State Bar No. 4879)
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Sarah Goldberg (Utah State Bar No. 13222)
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**CERTIFICATE OF DEFAULT
(MOHAMMED YASIN)**

Case No. 2:19-cv-00275-JNP-CMR
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PROPOSED CLASS ACTION

Pursuant to Fed. R. Civ. P. 55(a) and DUCivR 55-1(a), the Clerk of the Court hereby
finds that (1) Defendant Mohammed Yasin (“Yasin”) was properly served with process in this

action; (2) Yasin has failed to appear, plead, or file an answer in this action; and (3) the time allowed by law for Yasin to plead or answer has expired.

Accordingly, the default of Yasin is hereby entered according to law.

ATTEST MY HAND and the seal of the Court this ____ day of _____, 2019.

CLERK OF THE COURT

By: _____