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8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN JOSE DIVISION**

11 **Google LLC**

12 Plaintiff,

13 vs.

14 **Equustek Solutions Inc., Clarma**  
15 **Enterprises Inc., and Robert Angus,**

16 Defendants.

Case No. 5:17-cv-04207-EJD

**REQUEST FOR ENTRY OF DEFAULT OF ALL  
DEFENDANTS**

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1 TO THE CLERK OF COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA:

2 Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Google LLC (“Google”)  
3 respectfully requests that the Clerk enter the default of Defendants Equustek Solutions Inc.,  
4 Clarma Enterprises Inc., and Robert Angus (collectively, “Equustek”) in this action. Defendants  
5 have failed to appear or otherwise respond to the Complaint within the time prescribed by the  
6 Federal Rules of Civil Procedure and Civil Local Rules of the Northern District of California.

7 On July 24, 2017, Google filed its Complaint against Defendants. Dkt. 1. On July 27,  
8 2017, Google filed a Motion for Preliminary Injunctive Relief against Defendants. Dkt. 16. On  
9 July 26 and 27, 2017, Google hand-served each Defendant with the Complaint, the Summons, and  
10 Google’s Motion for Preliminary Injunctive Relief (Dkt. 16) and supporting papers. *See* Dkt. 17-  
11 19 (Certificates of Service). Pursuant to Fed. R. Civ. Pro. 12(a)(1)(A)(i), Defendants were  
12 required to answer or otherwise respond to Google’s Complaint within 21 days of service. On  
13 August 10, 2017, Google agreed to extend Equustek’s time to Answer, and filed a stipulation to  
14 extend Defendants’ time to oppose the Motion for Preliminary Injunctive Relief. *See* Dkt. 25.  
15 The Court thereafter granted the extension. *See* Dkt. 26. Equustek’s Answer and any opposition  
16 to Google’s Motion for Preliminary Injunctive Relief were due September 7, 2017. *See* Dkt. 25-  
17 26.

18 Equustek did not timely answer, oppose, or otherwise appear on September 7, 2017. On  
19 September 8, 2017, Defendant Robert Angus, the CEO of Equustek, faxed a letter to counsel for  
20 Google stating that Defendants would not be defending this action. Equustek has not subsequently  
21 answered, opposed, or otherwise appeared in this action. Accordingly, Google respectfully  
22 requests the Clerk enter the default of Defendants Equustek Solutions Inc., Clarma Enterprises  
23 Inc., and Robert Angus in this action.

24 Following Entry of Default, Google intends to move for a default judgment under Fed. R.  
25 Civ. P. 55(b), including a permanent injunction.

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DATED: October 31, 2017

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Margret M. Caruso  
Margret M. Caruso  
Carolyn M. Homer

*Attorneys for Plaintiff*  
*Google LLC*