

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI, DIVISION

NOTED  
FILED *jen*  
AUG 29 1996  
CHARLES R. BURKE  
CLERK, U.S.D.C. / S.D.F.L. / MIA

CASE NO.: 96-1104-CIV-KING  
Magistrate Stephen T. Brown

DOBSON COLLINS,

Plaintiff,

v.

FLAGSHIP AIRLINES, INC.  
A Delaware corporation,

Defendant.

**MOTION FOR ENTRY OF DEFAULT JUDGMENT**

Plaintiff, DOBSON COLLINS, by and through his undersigned counsel, and pursuant to Fed. R. Civ. P. 55(b)(2) and S.D. Fla. L.R. 7.1(A)(1)(e), hereby respectfully move this Court for an entry of default judgment against the Defendant for the following reasons:

1. On July 29, 1996, the Court entered an Order Granting in Part and Denying in Part Defendant's Motion to Dismiss instructing Defendant to answer the Plaintiff's claim for race discrimination within twenty days from the date of the Order.

2. Twenty days from the date of the Order Granting in Part and Denying in Part Defendant's Motion to Dismiss fell on August 19, 1996.

3. As of Friday, August 23, 1996, the Defendant had not filed an answer.

WHEREFORE, Plaintiff moves for the entry of an Order granting default judgment against the Defendant. A proposed Order granting Plaintiff's motion is attached for the convenience of the Court.

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*(K)*

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Respectfully submitted,

KURZBAN, KURZBAN, WEINGER  
& TETZELI, P.A.

Attorneys for Plaintiff

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By:   
\_\_\_\_\_  
IRA J. KURZBAN, ESQ.  
FLORIDA BAR NO. 225517

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY a true and correct copy of the foregoing was served via U.S. Mail this 23rd day of August, 1996, upon: Terence G. Connor, Esq., MORGAN, LEWIS & BOCKIUS L.L.P., 5300 First Union Financial Center, 200 S. Biscayne Boulevard, Miami, Florida 33131-2339.

  
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IRA J. KURZBAN, ESQ.