

Plaintiffs Farrar, Lax, Judy, MacLaren, Roth, hereinafter "Plaintiffs" move this honorable court to issue default judgment against defendants Hon. Brian Kemp, GA secretary of State and Executive Committee of the Democrat Party of GA pursuant to rule 616-1-2-.30.

ARGUMENT

Rule 616-1-2-.30 provides

(1) A default order may be entered against a party that fails to participate in any stage of a proceeding, a party that fails to file any required pleading, or a party that fails to comply with an order issued by the Administrative Law Judge.

Pursuant to pretrial order issued by this Honorable court, (Exhibit 1) Plaintiffs submitted their first amended complaint and exhibits on December 9, 2011. Statutory valid proof of service is attached to the first amended complaint. (Exhibit 2)

According to the pretrial order of this court (Exhibit 1) the defendants were obligated to respond by December 19th, 2011. Only one defendant, Barack Obama, responded by and through his attorney Mr. Jablonski. Defendants Secretary of State of GA, Brian Kemp (Hereinafter Kemp) and defendant Executive committee of the Democrat party of GA (Hereinfater "Committee") did not respond and did not file any answer to the complaint.

It is clear that defendants Kemp and Committee are not interested in participating in this litigation and are relying on the resolution between Plaintiffs and defendant Obama. As such Plaintiffs respectfully move this court to issue a default judgment against defendants Kemp and Committee.

CONCLUSION

Due to all of the above default judgment should be issued against defendants Brian Kemp and defendant Executive Committee of the Democrat Party of GA.

11.23.2011

/s/ Orly Taitz

Attorney for Plaintiffs Farrar, Lax, Judy, MacLaren, Roth

Certificate of service

I, Orly Taitz, declare that a copy of the above Motion for Default judgment was forwarded to the defendants on 12.23.2011. at

Michael Jablonski attorney for defendant Obama

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Scott Kwain attorney for the defendant Obama

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Honorable Brian P. Kemp

Secretary of State

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