

NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
19 CVS 8163

STEVEN MCRAE,)
)
 Plaintiff,)
)
 v.)
)
 KYLE RUSSELL CURTIS,)
)
 Defendant.)
)
)

MOTION FOR ENTRY OF DEFAULT

NOW COMES Plaintiff Steven McRae, through his undersigned counsel, pursuant to Rule 55 of the North Carolina Rules of Civil Procedure, and moves the Court for entry of default against Defendant Kyle Russell Curtis for failure to appear, answer, or otherwise respond to the Complaint within thirty (30) days after service of the Summons and Complaint. In support hereof, Plaintiff relies on the Affidavit of Service of Process, filed contemporaneously herewith, and shows the Court as follows:

1. This action was commenced by the filing of the Summons and Complaint on August 23, 2019.
2. On August 30, 2019, Defendant was duly served via certified mail, return receipt requested, addressed to his place of residence.
3. Defendant's time to answer or otherwise respond to the Complaint expired on September 30, 2019.
4. Defendant failed to appear, answer, or otherwise respond within the allotted time.
5. Defendant is neither a minor nor an incompetent person.

WHEREFORE, Plaintiffs respectfully pray that Default be entered against Defendant based on his failure to appear, answer, or otherwise respond.

Respectfully submitted, this the 2nd day of October, 2019.

CONNORS MORGAN, PLLC

/s/ Jonathan M. Parisi

C. Scott Meyers

N.C. State Bar No. 30651

Jonathan M. Parisi

N.C. State Bar No. 54210

1175 Revolution Mill Dr., Suite 8

Greensboro, North Carolina 27405

Phone: (336) 333-7907

Fax: (336) 333-7909

Attorneys for Plaintiff