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 2 Attorney General
 Firm State Bar No. 174000
 3 TAREN M. ELLIS
 4 Assistant Attorney General
 State Bar No. 022431
 5 Pima County Computer No. 65731
 taren.ellis@azag.gov
 6 Consumer Protection & Advocacy Section
 400 W. Congress, South Bldg., Suite 315
 7 Tucson, Arizona 85701-1367
 Telephone: (520) 628-6504
 8 Attorneys For Plaintiff

9 **ARIZONA SUPERIOR COURT**
COUNTY OF PIMA

10 STATE OF ARIZONA, ex rel. TERRY
 11 GODDARD, Attorney General,
 12 Plaintiff,

13 -vs-

14 Dependable Locks, Inc.; Priceline Locksmith;
 15 A1 Locksmith 24 Hours, Inc.; A1 24 HR
 Locksmith; David Sasson, individually and as
 16 operator of A1 Locksmith 24 Hours, Inc.; David
 Sasson and Jane Doe Sasson, as a marital
 17 community; Gilad Gill, individually and as
 owner of Priceline Locksmith; Gilad Gill and
 18 Jane Doe Gill, as a marital community; David
 Peer, individually and as owner of Dependable
 19 Locks, Inc.; David Peer and Jane Doe Peer, as a
 marital community,
 20 Defendants.

Case No: C 2008-7280

**ENTRY OF DEFAULT AGAINST
 DEFENDANTS DEPENDABLE LOCKS,
 INC.; A1 24 HR LOCKSMITH; DAVID
 PEER; AND JANE DOE PEER**

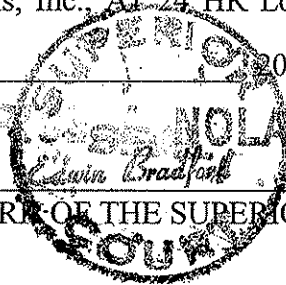
(Assigned to the Honorable Paul Tang)

21 The State of Arizona having filed an Application with the Clerk of the Court, pursuant
 22 to Rule 55(a) of the Arizona Rules of Civil Procedure, requesting an entry of default against
 23 Defendants Dependable Locks, Inc., A1 24 HR Locksmith, David Peer and Jane Doe Peer: A
 24 default is entered against Defendants Dependable Locks, Inc., A1 24 HR Locksmith, David
 25 Peer and Jane Doe Peer, effective on the ___ day of _____, 2010.

26 DATED: MAR 24 2010, 2010.

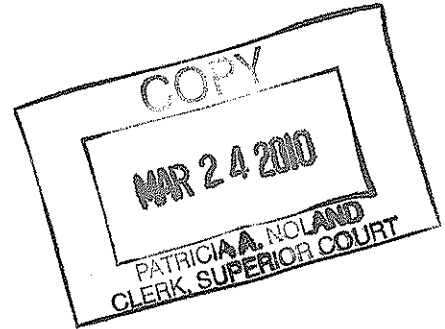
27 **PATRICIA A. NOLAND**

28 by *Edwin Bradford*
 Deputy CLERK OF THE SUPERIOR COURT



effective 4/6/10

1 Terry Goddard
2 Attorney General
3 Firm State Bar No. 14000
4
5 TAREN M. ELLIS
6 Assistant Attorney General
7 State Bar No. 022431
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13 Telephone: (520) 628-6504
14 Attorneys For Plaintiff



10 **ARIZONA SUPERIOR COURT**
11 **COUNTY OF PIMA**

12 STATE OF ARIZONA, ex rel. TERRY
13 GODDARD, Attorney General,

14 Plaintiff,

15 -vs-

16 Dependable Locks, Inc.; Priceline Locksmith;
17 A1 Locksmith 24 Hours, Inc.; A1 24 HR
18 Locksmith; David Sasson, individually and as
19 operator of A1 Locksmith 24 Hours, Inc.; David
20 Sasson and Jane Doe Sasson, as a marital
21 community; Gilad Gill, individually and as
22 owner of Priceline Locksmith; Gilad Gill and
23 Jane Doe Gill, as a marital community; David
24 Peer, individually and as owner of Dependable
25 Locks, Inc.; David Peer and Jane Doe Peer, as a
26 marital community,

27 Defendants.

Case No: C 2008-7280

APPLICATION FOR ENTRY OF
DEFAULT JUDGMENT AGAINST
DEFENDANTS DEPENDABLE LOCKS,
INC.; A1 24 HR LOCKSMITH; DAVID
PEER; AND JANE DOE PEER

(Assigned to the Honorable Paul Tang)

25 Pursuant to Rule 55(a) and (b)(1) of the Arizona Rules of Civil Procedure, Plaintiff, the
26 State of Arizona, *ex rel.* Terry Goddard, Attorney General, requests that the Court enter a
27 judgment by default against Defendants Dependable Locks, Inc., A1 24 HR Locksmith, David
28

1 Peer and Jane Doe Peer. The State submits there is no just cause for delay in entry of a default
2 judgment against these Defendants.

3 The matter before the Court is an action by the state of Arizona against Defendants
4 pursuant to the Arizona Consumer Fraud Act, A.R.S. § 44-1521, *et seq.* This action was
5 commenced on November 17, 2009. The State served Defendants Dependable Locks, Inc.,
6 David Peer, Jane Doe Peer and A1 24 HR Locksmith via certified mail pursuant to Rule 4.2(c)
7 of the Arizona Rules of Civil Procedure.
8

9 When the whereabouts of a party outside the state is known, service may be
10 made by depositing the summons and a copy of the pleading being served in the
11 post office, postage prepaid, to be sent to the person to be served by any form of
12 mail requiring a signed and returned receipt.

13 Ariz. Rules of Civ.Proc., Rule 4.2(c).

14 On December 7, 2009, Mr. Edward Williams, Esq.'s office accepted service on behalf
15 of Defendants Dependable Locks, Inc., David Peer and Jane Doe Peer. *See* Exhibit A. On that
16 same date, John Gunther accepted service on behalf of Defendant A1 24 HR Locksmith. *See*
17 Exhibit B.

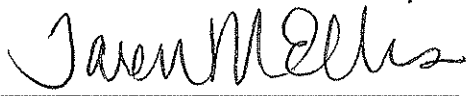
18 "Where service of the summons and of a copy of a pleading requiring service by
19 summons is made outside the state by any means authorized by this Rule 4.2, other than
20 subsection (d), the person served shall appear and answer within thirty days after completion
21 thereof. . . ." Ariz. Rules of Civ.Proc., Rule 4.2(m). Thirty days from the date representatives
22 accepted service on behalf of Defendants Dependable Locks, Inc., A1 24 HR Locksmith, David
23 Peer and Jane Doe Peer was on or about January 6, 2010. To date, Defendants Dependable
24 Locks, Inc., A1 24 HR Locksmith, David Peer and Jane Doe Peer have not answered the
25 allegations. "Averments in a pleading to which a responsive pleading is required, other than
26 those as to the amount of damage, are admitted when not denied in the responsive pleading."
27

28 Ariz. Rules of Civ.Proc., Rule 8(d).

1 "When a party against whom a judgment for affirmative relief is sought has failed to
2 plead or otherwise defend as provided by these Rules, the clerk shall enter that party's default
3 in accordance with the procedures set forth below." Ariz. Rules of Civ.Proc., Rule 55(a).
4 Consequently, the State respectfully requests that Defendants Dependable Locks, Inc., A1 24
5 HR Locksmith, David Peer and Jane Doe Peer's default be entered pursuant to Rule 55(a) of
6 the Arizona Rules of Civil Procedure.
7

8 DATED this 24th day of March, 2010.

10 TERRY GODDARD,
11 Attorney General

12 By: 
13 TAREN M. ELLIS
14 Assistant Attorney General

15 Copies of the foregoing was hand-delivered
16 This 24th day of March, 2010, to:

17 Honorable Paul Tang
18 Pima County Superior Court
19 110 West Congress
20 Tucson, Arizona 85701

21 Copies of the foregoing was mailed this
22 24th day of March, 2010, to:

23 Dependable Locks, Inc.
24 David Peer and Jane Doe Peer
25 c/o Edward W. Williams, Esq.
26 205 West Wacker Drive, Suite 1220
27 Chicago, IL 60606

28 A1 24 HR Locksmith
2643 Gulf to Bay Blvd., Suite 1560
Clearwater, FL 33759

Exhibit A



Taren M. Ellis
Assistant Attorney General
Consumer Protection &
Advocacy Section
Telephone: (520) 628-6504
Facsimile: (520) 628-6532

Terry Goddard
Attorney General

Office of the Attorney General
State of Arizona

December 2, 2009

Dependable Locks, Inc.
David Peer and Jane Doe Peer
c/o Edward W. Williams, Esq.
205 West Wacker Drive, Suite 1220
Chicago, IL 60606

VIA CERTIFIED MAIL

Re: State v. Dependable Locks, Inc., et al.

Dear Mr. Williams:

Enclosed with this letter is a copy of the Civil Summons and Complaint for Injunctive and Other Relief for each of the following Defendants: Dependable Locks, Inc., David Peer, individually and as owner of Dependable Locks, Inc., David Peer and Jane Doe Peer.

Sincerely,

A handwritten signature in cursive script, appearing to read "Taren M. Ellis".

Taren M. Ellis
Assistant Attorney General
Consumer Protection & Advocacy Section

Enclosures

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
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OFFICIAL USE

Postage	\$	
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Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage		

Postmark Here

Dependable Locks, Inc.
David Peer and Jane Doe Peer
c/o Edward W. Williams, Esq.
205 West Wacker Drive, Suite 1220
Chicago, IL 60606

Sent To _____
 Street, Apt. or PO Box | _____
 City, State, etc. | _____

PS Form 3800, August 2006 See Reverse for Instructions

7008 2810 0001 6546 2334


SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Dependable Locks, Inc. David Peer and Jane Doe Peer c/o Edward W. Williams, Esq. 205 West Wacker Drive, Suite 1220 Chicago, IL 60606</p>	<p>A. Signature  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____</p> <p>C. Date of Delivery 12-7-09</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label) 7008 2810 0001 6546 2334</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

Exhibit B



Terry Goddard
Attorney General

Office of the Attorney General
State of Arizona

Taren M. Ellis
Assistant Attorney General
Consumer Protection &
Advocacy Section
Telephone: (520) 628-6504
Facsimile: (520) 628-6532

December 2, 2009

A1 24 HR Locksmith
2643 Gulf to Bay Blvd., Suite 1560
Clearwater, FL 33759

VIA CERTIFIED MAIL

Re: State v. Dependable Locks, Inc., et al.

Dear Sir:

Enclosed with this letter is a copy of the Civil Summons and Complaint for Injunctive and Other Relief filed by the Arizona Attorney General's Office on November 17, 2009.

Sincerely,

A handwritten signature in cursive script that reads "Taren M. Ellis".

Taren M. Ellis
Assistant Attorney General
Consumer Protection & Advocacy Section

Enclosure

7008 2810 0001 6546 2376

U.S. Postal Service
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OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	

Postmark
Here

Total Po **A1 24 HR Locksmith**
2643 Gulf to Bay Blvd., Suite 1560
Clearwater, FL 33759

Sent To

Street, Apt. or PO Box

City, State,

PS Form 3811, August 2004 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>John G. [Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>A1 24 HR Locksmith 2643 Gulf to Bay Blvd., Suite 1560 Clearwater, FL 33759</p>	<p>B. Received by (Printed Name) <i>John G. [Signature]</i></p>	<p>C. Date of Delivery <i>1/27/04</i></p>
	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>2. Article Number <i>0873</i> (Transfer from service label)</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

7008 2810 0001 6546 2376

1 TERRY GODDARD
2 Attorney General
3 Firm Bar No. 14000

4 TAREN M. ELLIS
5 Assistant Attorney General
6 State Bar No. #022431
7 Pima County Computer No. 65731
8 taren.ellis@azag.gov
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10 400 W. Congress, South Bldg., Suite 315
11 Tucson, Arizona 85701-1367
12 Telephone: (520) 628-6631
13 Attorneys for Plaintiff

14 **ARIZONA SUPERIOR COURT**
15 **COUNTY OF PIMA**

16 State of Arizona, ex rel. Terry Goddard,
17 Attorney General,

18 Plaintiff,

19 vs.

20 Dependable Locks, Inc.; Priceline
21 Locksmith; A1 Locksmith 24 Hours, Inc.;
22 A1 24 HR Locksmith; David Sasson,
23 individually and as operator of A1
24 Locksmith 24 Hours, Inc.; David Sasson
25 and Jane Doe Sasson, as a marital
26 community; Gilad Gill, individually and
27 as owner of Priceline Locksmith; Gilad
28 Gill and Jane Doe Gill, as a marital
community; David Peer, individually and
as owner of Dependable Locks, Inc.;
David Peer and Jane Doe Peer, as a
marital community,

Defendants.

No. C20087280

AFFIDAVIT OF SERVICE BY
PUBLICATION PURSUANT TO RULES
4.1(n) AND 4.2 (f)

(As to David Sasson and Jane Doe
Sasson)

Assigned to the Honorable Paul Tang

Yolanda U. Leon swears that:

1. I am the Legal Secretary to the attorney representing the Plaintiff, the
State of Arizona, in this matter and I am authorized to make this affidavit on its behalf.

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2. I make this affidavit to satisfy the requirements of Rule 4.1(n) and Rule 4.2(f) Rules of Civil Procedure to show the manner and dates of publication and mailing, and the circumstances warranting the utilization of service of process by publication.

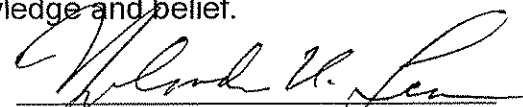
3. Service of process by publication is warranted as the Plaintiff has been unable to locate Defendants David Sasson and Jane Doe Sasson.

4. The Complaint for Injunctive and Other Relief has been published at least once a week for four successive weeks in a newspaper published in the county where the action is pending. Defendants' last known residence is outside the State of Arizona.

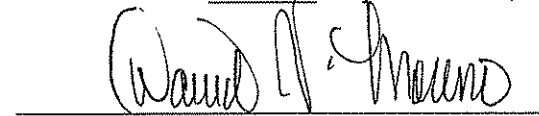
5. Attached hereto and incorporated herein is a printed copy of the publication.

6. On December 2, 2009, in connection with the lawsuit entitled *State v. Dependable Locks, Inc., et al.*, No. C20087280, I sent a copy of the summons and complaint by Certified Return Receipt to David Sasson and Jane Doe Sasson. The mailing was returned as undeliverable with no forwarding address.

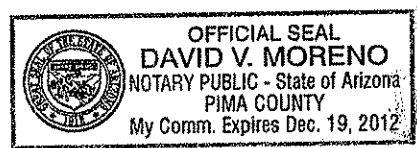
7. That I have read the foregoing and avow that the facts stated herein are true and correct, to the best of my knowledge and belief.


YOLANDA U. LEON

SUBSCRIBED AND SWORN to before me this 15th day of March, 2010.


Notary Public

My Commission Expires:



**SUMMONS
ARIZONA SUPERIOR COURT, PIMA
COUNTY**

Plaintiff State of Arizona, ex rel. Terry Goddard, Attorney General Defendants vs. Dependable Locks, Inc.; Priceline Locksmith; A1 Locksmith 24 Hours, Inc.; A1 24 HR Locksmith; David Sasson, individually and as operator of A1 Locksmith 24 Hours, Inc.; David Sasson and Jane Doe Sasson, as a marital community; Gilad Gill, individually and as owner of Priceline Locksmith; Gilad Gill and Jane Doe Gill, as a marital community; David Peer, individually and as owner of Dependable Locks, Inc.; David Peer and Jane Doe Peer, as a marital community No. C20087280
CIVIL SUMMONS Assigned to the Honorable Paul Tang THE STATE OF ARIZONA to the above-named Defendants David Sasson and Jane Doe Sasson, as a marital community

I A lawsuit has been filed against you. If you do not want a Judgment taken against you for the relief demanded in the accompanying Complaint, you must file a Response in writing in the Office of the Clerk of the Superior Court, 110 West Congress, Tucson, Arizona, accompanied by the necessary filing fee. A copy of the Response must also be mailed to the plaintiff/attorney whose name appears below.

III The Response must be filed within TWENTY DAYS, exclusive of the date of service, if served within the State of Arizona, or within THIRTY DAYS, exclusive of the date of service, if served outside the State of Arizona.

IV This is a legal document. If you do not understand its consequences, you should seek the advice of an attorney. Requests for reasonable accommodation for persons with disabilities must be made to the Court by parties at least three (3) working days in advance of a scheduled Court proceeding.

WITNESS My Hand and the Seal of the Superior Court. DATED: CLERK OF THE SUPERIOR COURT
By _____ Deputy Clerk
ATTORNEY'S NAME, ADDRESS, PHONE: Taren M. Ellis Assistant Attorney General 400 W. Congress, S-Bldg., Suite 315 Tucson, Arizona 85701 Tel: (520) 628-6631 Computer No. 65731

**PUBLISH: The Daily Territorial
Feb. 16, 23, March 2, 9, 2010
smsasson/20087280 rm**