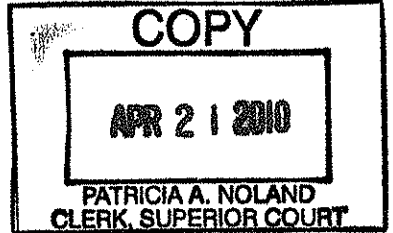


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Terry Goddard
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Attorneys For Plaintiff



ARIZONA SUPERIOR COURT
COUNTY OF PIMA

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

Plaintiff,

-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,

Defendants.

Case No: C 2008-7280

APPLICATION FOR ENTRY OF
DEFAULT JUDGMENT AGAINST
DEFENDANTS PRICELINE
LOCKSMITH, A1 LOCKSMITH 24
HOURS, INC., DAVID SASSON, JANE
DOE SASSON, GILAD GILL AND JANE
DOE GILL

(Assigned to the Honorable Paul Tang)

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

1 David Sasson, Jane Doe Sasson, Gilad Gill and Jane Doe Gill. The State submits there is no
2 just cause for delay in entry of a default 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 Priceline Locksmith, A1
6 Locksmith 24 Hours, Inc., David Sasson, Jane Doe Sasson, Gilad Gill and Jane Doe Gill via
7 publication pursuant to Rule 4.2(f) of the Arizona Rules of Civil Procedure.
8

9 When the person to be served is one whose present residence is unknown but
10 whose last known residence was outside the state, or has avoided service of
11 process, and service by publication is the best means practicable under the
12 circumstances for providing notice of institution of the action, then service may
be made by publication in accordance with the requirements of this subpart. . . .
The service shall be complete thirty days after the first publication.

13 Ariz. Rules of Civ.Proc., Rule 4.2(f). Pursuant to Rule 4.2(f), the notice was published in The
14 Daily Territorial on February 16, February 23, March 2, and March 9, 2010. Service was
15 complete on or about March 18, 2010.

16 “Where service of the summons and of a copy of a pleading requiring service by
17 summons is made outside the state by any means authorized by this Rule 4.2, other than
18 subsection (d), the person served shall appear and answer within thirty days after completion
19 thereof. . . .” Ariz. Rules of Civ.Proc., Rule 4.2(m). Thirty days from the date service by
20 publication was complete was on or about April 19, 2010. To date, Defendants Priceline
21 Locksmith, A1 Locksmith 24 Hours, Inc., David Sasson and Jane Doe Sasson, Gilad Gill and
22 Jane Doe Gill have not answered the allegations. “Averments in a pleading to which a
23 responsive pleading is required, other than those as to the amount of damage, are admitted
24 when not denied in the responsive pleading.” Ariz. Rules of Civ.Proc., Rule 8(d).
25

26 “When a party against whom a judgment for affirmative relief is sought has failed to
27 plead or otherwise defend as provided by these Rules, the clerk shall enter that party’s default
28

1 in accordance with the procedures set forth below.” Ariz. Rules of Civ.Proc., Rule 55(a).
2 Consequently, the State respectfully requests that Defendants Priceline Locksmith, A1
3 Locksmith 24 Hours, Inc., David Sasson, Jane Doe Sasson, Gilad Gill and Jane Doe Gill’s
4 default be entered pursuant to Rule 55(a) of the Arizona Rules of Civil Procedure.

5 The whereabouts of Defendants Priceline Locksmith, A1 Locksmith 24 Hours, Inc.,
6 David Sasson, Jane Doe Sasson, Gilad Gill and Jane Doe Gill are unknown. Additionally, the
7 identity of counsel for Defendants Priceline Locksmith, A1 Locksmith 24 Hours, Inc., David
8 Sasson, Jane Doe Sasson, Gilad Gill and Jane Doe Gill is unknown.

9
10 DATED this 21st day of April, 2010.

11 TERRY GODDARD,
12 Attorney General

13
14 By: Jaren Mellis
15 TAREN M. ELLIS
16 Assistant Attorney General

17 Copies of the foregoing was hand-delivered
18 This 21st day of April, 2010, to:

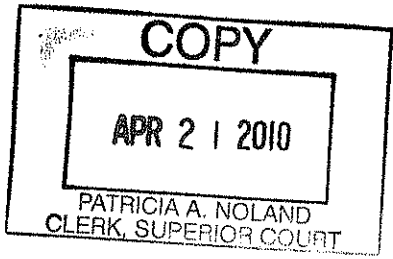
19 Honorable Paul Tang
20 Pima County Superior Court
21 110 West Congress
22 Tucson, Arizona 85701

23 Copies of the foregoing was mailed this
24 21st day of April, 2010, to:

25 Dependable Locks, Inc.
26 David Peer and Jane Doe Peer
27 c/o Edward W. Williams, Esq.
28 205 West Wacker Drive, Suite 1220
Chicago, IL 60606

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

1 Terry Goddard
2 Attorney General
3 Firm State 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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11 Tucson, Arizona 85701-1367
12 Telephone: (520) 628-6504
13 Attorneys For Plaintiff



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

Case No: C 2008-7280

**ENTRY OF DEFAULT AGAINST
DEFENDANTS PRICELINE
LOCKSMITH, A1 LOCKSMITH 24
HOURS, INC., DAVID SASSON, JANE
DOE SASSON, GILAD GILL AND JANE
DOE GILL**

(Assigned to the Honorable Paul Tang)

effective 5/6/10

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

26 DATED: APR 21 2010, 2010.

27 *by*
Deputy
28 **PATRICIA A. NOLAND**
CLERK OF THE SUPERIOR COURT