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17 **UNITED STATES DISTRICT COURT**
 18 **CENTRAL DISTRICT OF CALIFORNIA**

19 VPN.COM LLC,
 20 *Plaintiff,*

21 vs.

22 GEORGE DIKIAN;
 23 QIANG DU; and
 24 JOHN DOE

25 *Defendants.*

Case No: 2:22-cv-04453-AB-MAR

PLAINTIFF'S RESPONSE TO
COURT'S ORDER TO SHOW CAUSE

1 This Response is submitted pursuant to the Court’s Order at ECF 27 (the
2 “OSC”) directing that VPN show cause why this action should not be dismissed
3
4 for lack of prosecution.


5 In short, VPN had been working on its default judgment motion when
6
7 counsel for the Defendant George Dikian (“Defendant Dikian”) reached out to
8
9 VPN’s counsel to discuss the case, the possibility of expedited discovery, as
10
11 well as other case management issues. At Defendant Dikian’s request, VPN
12
13 agreed to temporarily delay the filing of its default judgment motion while
14
15 discussions took place. Due to disagreements over certain conditions sought by
16
17 Defendant Dikian, relating to the exchange of expedited discovery and alleged
18
19 privacy concerns related to Defendant Dikian making an appearance in the case,
20
21 those discussions ended up taking longer than anticipated. The parties had been
22
23 working on a timeline of next steps when Your Honor issued the OSC. Due to
24
25 the OSC, VPN requested Defendant Dikian formally appear in the case, and
26
27 VPN also agreed to set aside the entry of default against Defendant Dikian and
28
allow until December 9, 2022, for Defendant Dikian to respond to the
Complaint. *See* ECF 28, 29.

 As to Defendant Qiang Du, VPN has not been contacted by any counsel
and intends to proceed with a default judgment motion without further delay.

1 DATED: December 2, 2022

2 Brett E. Lewis
3 Michael D. Cilento
4 **LEWIS & LIN, LLC**

5 Ji-In Lee Houck (SBN 280088)
6 **STALWART GROUP**

7 By: 
8 Michael D. Cilento (*pro hac vice*)
9 Attorneys for Plaintiff VPN.COM LLC

10 **Proof of Service**

11 I, the undersigned, certify and declare that (i) I am over the age of 18
12 years, (ii) I am not a party to this action, (iii) I am admitted to practice law in
13 this Court and case *pro hac vice*, and (iv) on December 2, 2022, I served a true
14 and correct copy of the following documents to the following individuals by the
15 following means:
16

17 Document: Plaintiff's Response to Court's Order to Show Cause

18 To: George Dikian via ECF to attorney of record Michael L Rodenbaugh:
19 mike@rodenbaugh.com, docket@rodenbaugh.com,
20 jonathan@rodenbaugh.com
21

22 To: Qiang Du via email to rhwdomains@gmail.com
23

24 I declare under the penalty of perjury that the foregoing is true and correct.

25 By: 
26 Michael D. Cilento
27
28