

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

PATRICK NATHANIEL REED,

Plaintiff

v.

SHANE RYAN et al

Defendants.

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**Case Number: 3:22-cv-01181-BJD-PDB**

**MOTION TO ENTER DEFAULT**

Plaintiff Patrick Nathaniel Reed (“Mr. Reed”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, hereby requests that the Clerk of this Court enter a default in this matter against Defendant Fox Sports, Inc. (“Fox Sports”) on the grounds that it has failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure.

Fox Sports was served through The Prentice-Hall Corporation System, Inc on November 14, 2022. Exhibit 2; *Affidavit of Sean Snow*. According to Mr. Snow’s affidavit, Fox Sports was served by “delivering a conformed copy of the Summons in a Civil Action; Complaint to Lyanne Gares as Litigation Management Services Leader & Authorized Agent of Fox Sports, Inc.” Exhibit 2. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), a defendant must serve an answer within 21 days of being served, which means that Fox Sports’ responsive pleadings were

due on December 5, 2022. Exhibit 1; *Affidavit of Larry Klayman*. To date, Fox Sports has not responded or appeared in this matter. Exhibit 1. Accordingly, default against Fox Sports must respectfully be entered.

Dated: August 29, 2023

Respectfully Submitted,

By: /s/ Larry Klayman  
Larry Klayman, Esq.  
Florida Bar No.: 246220  
Klayman Law Group P.A.  
7050 W. Palmetto Park Rd  
Boca Raton, FL, 33433  
Tel: 561-558-5536  
[leklayman@gmail.com](mailto:leklayman@gmail.com)

*Counsel for Patrick Nathaniel Reed*

**CERTIFICATE OF SERVICE**

I, Larry Klayman, hereby certify that on this day, August 29, 2023, I electronically filed the foregoing with the Clerk of Court using the Court's ECF procedures. I also certify that the foregoing document is being served this day on all counsel of record through the Court's eservice procedures.

/s/ Larry Klayman

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

PATRICK NATHANIEL REED,

Plaintiff,

v.

SHANE RYAN, *et al*

Defendants.

**Case No: 3:22-cv-01181-TJC-PDB  
ORAL ARGUMENT REQUESTED**

**SWORN AFFIDAVIT OF LARRY KLAYMAN**

I, Larry Klayman, being over eighteen years of age and duly competent to testify, hereby swear and affirm as follows:

1. I, based on my personal knowledge and belief, will attest to and testify of the following facts if called upon as a witness, could testify competently thereto.

2. I am counsel to Plaintiff Patrick Reed (“Mr. Reed”) in the above styled case.

3. Defendant Fox Sports, Inc. (“Fox Sports”) was served on November 14, 2022 according to the sworn affidavit of Sean Snow, licensed process server for Same Day Process Service. Exhibit 2.

4. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), a defendant must serve an answer within 21 days of being served, which means that Fox Sports’ responsive pleadings were due on December 5, 2022.

5. To date, Fox Sports has not responded or appeared in this matter.

6. Accordingly, default against Fox Sports must be entered.

I hereby certify that the foregoing facts are true and correct to the best of my personal information and belief.

Sworn to under penalty of perjury this August 29, 2023

/s/ Larry Klayman

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Larry Klayman, Esq.  
Klayman Law Group P.A.  
7050 W. Palmetto Park Rd  
Boca Raton, FL, 33433  
Tel: 561-558-5536  
[leklayman@gmail.com](mailto:leklayman@gmail.com)

# EXHIBIT 2

**AFFIDAVIT OF PROCESS SERVER**

**UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION**

**Patrick Nathaniel Reed**  
Plaintiff(s),

VS.

**Shane Ryan, et al**  
Defendant(s).

Attorney: Larry Klayman, Esq.

Klayman Law Group, P.A.  
2020 Pennsylvania Avenue, N.W., #800  
Washington DC 20006



**Case Number: 3:22-cv-01181-BJD-PDB**

Legal documents received by Same Day Process Service, Inc. on 11/11/2022 at 12:59 PM to be served upon Fox Sports, Inc., by serving The Prentice-Hall Corporation System, Inc. at 251 Little Falls Dr., Wilmington, DE 19808

I, **Sean Snow**, swear and affirm that on **November 14, 2022** at **10:55 AM**, I did the following:

Served **Fox Sports, Inc.**, by serving **The Prentice-Hall Corporation System, Inc.** by delivering a conformed copy of the **Summons in a Civil Action; Complaint** to **Lynanne Gares** as **Litigation Management Services Leader & Authorized Agent** of **Fox Sports, Inc.**, by serving **The Prentice-Hall Corporation System, Inc.** at **251 Little Falls Dr. , Wilmington, DE 19808**.

**Description of Person Accepting Service:**

Sex: Female Age: 45-55 Height: 5ft4in-5ft8in Weight: 161-200 lbs Skin Color: Caucasian Hair Color: Brown

**Supplemental Data Appropriate to this Service:**

I declare under penalty of perjury that the foregoing information contained in this affidavit is true and correct and that I am a professional process server over the age of 18 and have no interest in the above legal matter.

**Sean Snow**  
Process Server  
**Same Day Process Service, Inc.**  
1413 K St., NW, 7th Floor  
Washington DC 20005  
(202)-398-4200  
info@samedayprocess.com

Internal Job  
ID:287455

