

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

JAMES JULIAN,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 2:24-cv-02293-KHV-RES
CLEARLINK INSURANCE)	
AGENCY, LLC, BOSS LEADS, LLC,)	
BOSS LEADS LIVE, LLC,)	
And EDM LEADS LLC)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT
AS TO DEFENDANT EDM LEADS, LLC**

Plaintiff James Julian (“Plaintiff” or “Julian”) by and through undersigned counsel, files his Motion for Default Judgment as to Defendant EDM Leads, LLC C (“EDM Leads”), and states as follows:

1. On February 3, 2025, Plaintiff filed his Third Amended Complaint on. (Dkt. No.56).
2. On April 28, 2025, EDM Leads was served. (Dkt. No. 67)
3. EDM Leads’ answer or other responsive pleadings was due on May 28, 2025. Fed. R. Civ. Pro. 12.
4. Defendant failed to file an answer or other responsive pleading.

WHEREFORE, Plaintiff requests this Court to:

1. Order the Clerk of this Court to enter a Default Judgment as to liability against Defendant EDM Leads, LLC in accordance with Fed. R. Civ. P. 55(a);
2. Order a hearing on damages as to Defendant EDM Leads, LLC upon the completion of discovery in this matter in accordance with Fed. R. Civ. P. 55(b)(2);

3. All other relief this Court deems just and proper.

Dated June 3, 2025.

Respectfully submitted,

/s/ Paul K. Thoma

Paul K. Thoma

KS # 16145

Attorney for Plaintiff James Julian

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Admitted pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: June 3, 2025

/s/ Paul K. Thoma _____

Paul K. Thoma

KS # 16145

Attorney for Plaintiff James Julian

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