

ROBERT BURNS

NUMBER 603.248 DOCKET: 24

19<sup>TH</sup> JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

ANNA DOW

STATE OF LOUISIANA

\*\*\*\*\*

**MOTION AND ORDER FOR PRELIMINARY DEFAULT**

Considering the Memorandum in Support of Motion and Order for Preliminary Default, and on motion of Robert Burns, in proper person, it is ordered by this Honorable Court that a PRELIMINARY DEFAULT be entered herein.

Baton Rouge, Louisiana.

Granted and signed this \_\_\_\_\_ day of \_\_\_\_\_, 2011.

CERTIFIED TRUE COPY

031615

DEPUTY CLERK OF COURT

\_\_\_\_\_  
JUDGE, 19<sup>th</sup> JUDICIAL DISTRICT COURT

Respectfully Submitted,

Robert Edwin Burns, in proper person  
President, Auction Sells Fast, LLC  
4155 Essen Lane, Ste 228  
Baton Rouge, LA 70809-2152  
(225) 201-0390 (office) (225) 235-4346  
E-mail: [Robert@AuctionSellsFast.com](mailto:Robert@AuctionSellsFast.com)

Robert Edwin Burns

2011 NOV -3 PM 3:16  
EAST BATON ROUGE PARISH, LA  
FILED

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DEPUTY CLERK OF COURT

Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 3<sup>rd</sup> day of November 2011.

Robert Edwin Burns

ROBERT BURNS

NUMBER 603.248 DOCKET: 24

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PARISH OF EAST BATON ROUGE

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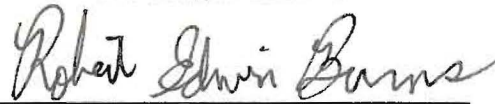
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**MEMORANDUM IN SUPPORT OF MOTION AND ORDER FOR PRELIMINARY DEFAULT**

This Petition was filed on July 6, 2011. A personal citation was served on the 19<sup>th</sup> day of July, 2011 upon April Hunt, Administrative Assistant for Defendant Anna Dow. Defendant filed a Special Motion to Strike and Exception for No Cause of Action which was heard by this Honorable Court on September 26, 2011. As reflected in the Judgment rendered by this Honorable Court, which was signed on October 7, 2011, the Special Motion to Strike was denied. Further, the Exception for No Cause of Action was granted. Further, it was ordered that Petitioner was granted 15 days from the date of the hearing in which to amend the petition to assert any cause of action not already expressed in the petition, memoranda, and attachments already filed herein. As reflected in the court filings of this matter, Petitioner filed amended pleadings with this Honorable Court on October 3, 2011 and, in accordance with CCP 1313(A)(1) served those pleadings upon Defendant via U. S. mail. Further, in accordance with CCP 1313(B), Petitioner filed in the record a certificate of the manner in which service was made upon Defendant. Petitioner suggests that Defendant, having failed to file any answer to either Petitioner's initial pleadings or his amended pleadings, by that lack of any such answer to the amended pleadings admits to them as written, thereby entitling Petitioner to the granting of an order for PRELIMINARY DEFAULT in this matter.

Respectfully Submitted,

Robert Edwin Burns, in proper person  
 President, Auction Sells Fast, LLC  
 4155 Essen Lane, Ste 228  
 Baton Rouge, LA 70809-2152  
 (225) 201-0390 (office) (225) 235-4346  
 E-mail: [Robert@AuctionSellsFast.com](mailto:Robert@AuctionSellsFast.com)



Service Information on Next Page.

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Robert Edwin Burns