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7 Attorney for Plaintiff  
LUCASFILM LTD.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**

11 LUCASFILM LTD., a California  
12 corporation,  
13  
14 Plaintiff,  
15 vs.  
16 SHEPPERTON DESIGN STUDIOS  
LIMITED, a United Kingdom company  
17 incorporated in England, ANDREW  
AINSWORTH, an individual, and DOES 1  
18 through 10, both inclusive,  
19 Defendants.

*lodged proposed order*  
*Judge proposed Judgment*

2006 AUG 21 PM 3:32  
CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIF.  
LOS ANGELES  
*MM*

FILED

Case No. CV05-3434 RGK (MANx)

NOTICE OF PLAINTIFF'S  
MOTION AND MOTION FOR  
ENTRY OF DEFAULT JUDGMENT

Date: September 18, 2006  
Time: 9:00 a.m.

Courtroom of the Honorable  
R. Gary Klausner  
United States District Judge

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SEP 30 2006

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1 TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on September 18, 2006, at 9:00 a.m. or as soon  
3 thereafter as the matter may be heard, plaintiff Lucasfilm Ltd. will move the above-  
4 entitled Court, located at 255 East Temple Street, Los Angeles, California, 90012, for  
5 entry of Judgment by Default against defendants Shepperton Design Studios Limited  
6 and Andrew Ainsworth, for plaintiff's actual damages and defendants' profits under  
7 the Copyright Act of 1976, 17 U.S.C. Sections 101 *et seq.*, the Lanham Act, 15 U.S.C.  
8 Sections 1051 *et seq.* and State unfair competition law, for trebling of plaintiff's  
9 damages under the Lanham Act, for punitive damages under State law, for a permanent  
10 injunction against further infringements of plaintiff's copyrights and trademarks and  
11 further unfair competition, for a Judgment compelling defendants' delivery up of  
12 infringing copies and materials for destruction, and for plaintiff's costs and attorneys'  
13 fees.

14 This Motion is made upon the following grounds, as set forth more fully in the  
15 supporting papers filed and served with this Notice of Motion and Motion:

16 1. Defendants were served with a copy of the Summons and  
17 Complaint in this action, defendants retained counsel and moved,  
18 unsuccessfully, for dismissal of this action for lack of jurisdiction, and  
19 defendants chose not to defend the claims against them.

20 2. Defendants were then each served with a copy of the Summons  
21 and First Amended Complaint in this action -- both by service on defendants'  
22 counsel and by personal service on defendants -- and defendants chose not to  
23 respond to that pleading.

24 3. Pursuant to the Court's March 2, 2006 Minute Order granting  
25 plaintiff's Request for Entry of Default, the Clerk has duly entered defendants'  
26 default on the First Amended Complaint on March 2, 2006 and defendants have  
27 not sought relief from the entry of their default.


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1           4. Defendants are not infants or incompetents and defendants are not  
2 in military service such that the Soldiers' and Sailors' Civil Relief Act of 1940  
3 would apply.

4           5. Defendants willfully violated the Copyright Act of 1976, the  
5 Lanham Act and California common law, obtaining substantial profits from their  
6 wrongful conduct and causing plaintiff substantial damages, and defendants have  
7 persisted in their willful violations of law and plaintiff's rights.

8           This Motion is based on this Notice of Motion and Motion and the  
9 accompanying Memorandum of Points and Authorities and Declarations, the First  
10 Amended Complaint, the Default by Clerk and other documents filed in this action, the  
11 matters of which plaintiff requests the Court take judicial notice and upon such further  
12 evidence and argument as may offered in support of the Motion.

13  
14 Dated: August 21, 2006

  
Peter J. Anderson, Esq.  
LAW OFFICES OF PETER J. ANDERSON  
A Professional Corporation  
Attorney for Plaintiff  
LUCASFILM LTD.

