

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AMERICAN CHEMICAL SOCIETY,

Plaintiff,

v.

SCI-HUB d/b/a WWW.SCI-HUB.CC,
JOHN DOES 1-99,

Defendants.

No. 1:17-cv-00726-LMB-JFA

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

Plaintiff American Chemical Society ("Plaintiff" or "ACS"), by counsel, hereby moves, pursuant to Fed. R. Civ. P. 55(b) and the Local Rules of this Court, for the entry of a default judgment against Defendant Sci-Hub d/b/a www.sci-hub.cc ("Sci-Hub").

Plaintiff moves for an Order: (i) entering Judgment against Defendant Sci-Hub on Counts I (Copyright Infringement) and III (Trademark Counterfeiting) of the First Amended Verified Complaint; (ii) dismissing all remaining claims against Defendant Sci-Hub without prejudice; and (iii) dismissing all claims against Defendants John Does 1-99 without prejudice in accordance with the accompanying memorandum of points and authorities.

Dated: September 1, 2017 By: /s/ Attison L. Barnes. III /s/
Attison L. Barnes, III (VA Bar No. 30458)
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CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on September 1, 2017, I electronically filed the foregoing by using the CM/ECF system. I also sent a copy to the following postal and email addresses associated with Defendant Sci-Hub:

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/s/ Attison L. Barnes, III /s/

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