

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM FRENCH, ET. AL.	:	No. 3:23-cv-00538-MEM
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
COUNTY OF LUZERNE, ET. AL.	:	
	:	
<u>Defendants.</u>	:	

**REQUEST FOR ENTRY OF DEFAULT**

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA:

Plaintiffs, William French and Melynda Anne Reese, respectfully request the Clerk to enter default against defendant, Luzerne County Bureau of Elections, on the basis that the record in this case demonstrates that there has been a failure to timely plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Dated: April 29, 2023

/s/ Walter S. Zimolong III

WALTER S. ZIMOLONG III, ESQUIRE  
JAMES J. FITZPATRICK III, ESQUIRE  
Zimolong, LLC  
PO Box 552  
Villanova, PA 19085-0552  
wally@zimolonglaw.com  
james@zimolonglaw.com  
Tele: 215-665-0842

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CERTIFICATE OF SERVICE

I hereby certify the foregoing has been filed electronically and is available for viewing and downloading from the Electronic Case Filing System of the United States District Court for the Eastern District of Pennsylvania. I further hereby certify that, in accordance with Fed. R. Civ. P. 5, service has been made as follows:

**Via First Class Mail**

County of Luzerne  
20 North Pennsylvania Avenue  
Wilkes Barre, PA 18701  
Attn: Brian Swetz, County Manager

**Via Email ([electionboard@luzernecounty.org](mailto:electionboard@luzernecounty.org)) and Regular Mail**

Luzerne County Board of Elections & Registration  
20 North Pennsylvania Avenue  
Wilkes Barre, PA 18701  
Attn: Denise Williams, Chair

**Via Email ([elections@luzernecounty.org](mailto:elections@luzernecounty.org)) and Regular Mail**

Luzerne County Bureau of Elections  
20 North Pennsylvania Avenue  
Wilkes Barre, PA 18701  
Attn: Eryn Harvey, Director

Respectfully submitted,

Dated: April 29, 2023

/s/ Walter S. Zimolong III

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james@zimolonglaw.com

Tele: 215-665-0842

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