

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

JUDICIAL WATCH, INC.,
Plaintiff,
v.

FANI WILLIS,
Defendant.

CIVIL ACTION FILE NO. 24CV002805

MOTION FOR DEFAULT JUDGMENT

Plaintiff Judicial Watch, Inc. moves for entry of default judgment against Defendant Fani Willis, in her official capacity as District Attorney of the Atlanta Judicial Circuit. As grounds for this Motion, Plaintiff shows that on March 13, 2024, it filed an affidavit of service upon Defendant.¹ Said Affidavit showed that service was made upon Defendant on March 11, 2024. Defendant has not filed an answer and no answer has been served upon Plaintiff. Pursuant to O.C.G.A. 9-11-12(a), Defendant's answer was due 30 days after service, or on April 10, 2024. Pursuant to O.C.G.A. 9-11-55(a), the case automatically became in default when an answer was not filed by the due date. Further pursuant to that Code section, Defendant was permitted as a matter of right to open the default within 15 days of the day of default, or by April 25, 2024. Further pursuant to that Code section, when Defendant did not exercise her right to open the

¹ A copy of the March 13, 2024 filing is attached to this Motion as Exhibit A. For inexplicable reasons, even though the filing bears the file stamp of the Clerk, it does not appear on the electronic docket. When the Court saw no service in the docket, On April 15, 2024, it ordered Plaintiff to perfect service and proof thereof. Plaintiff filed a second copy of the March 13 filing the same day. This second copy, which bears a new file stamp of the Clerk (and which does appear on the docket) is attached to this Motion as Exhibit B.

Exhibit A

FILED IN OFFICE
CLERK OF SUPERIOR COURT
FULTON COUNTY, GEORGIA
24CV002805

MAR 13, 2024 04:55 PM

Ché Alexander, Clerk
Fulton County Superior Court

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

Judicial Watch, Inc.,

Plaintiff(s),

Case No.: 24CV002805

vs.

**Fani Willis, in her official capacity As District
Attorney of the Atlanta Judicial Circuit and Fulton
County, Georgia,**

Defendant(s).

AFFIDAVIT OF SERVICE

Personally appeared before me the undersigned officer duly authorized to administer oaths, Danny Davidson, who, after being duly sworn, deposes and states the following:

1.

Affiant states that he/she is appointed by this Court to serve process. The statements made are true and correct and are based upon my personal knowledge.

2.

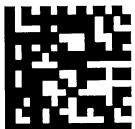
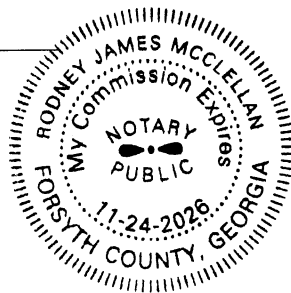
I served Fani Willis with a Summons, Complaint, and Exhibits 1 - 4 by leaving the documents with Tia Green, Department Executive Assistant of Fani Willis at said person's place of employment/place of business located at 136 Pryor Street, 3rd Floor, Atlanta, GA 30303 on March 11, 2024 at 1:12 PM.

Description of person process was left with:

Sex: Female - Ethnicity: African American - Hair: Black - Age: 30-40 - Height: 5ft 07in - Weight: 140 lbs

Signed and sworn to before me on
this 12 day of MARCH, 2024
by an affiant who is personally known to me
or produced identification.

Danny Davidson
Express Legal Services LLC
860 Johnson Ferry Rd.
Atlanta, GA 30342
(678) 648-6330

Notary Public

5158712

Exhibit B

FILED IN OFFICE
CLERK OF SUPERIOR COURT
FULTON COUNTY, GEORGIA
24CV002805

APR 15, 2024 01:50 PM

Ché Alexander, Clerk
Fulton County Superior Court

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

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Plaintiff(s),

Case No.: 24CV002805

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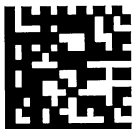
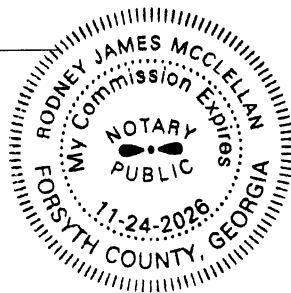
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