VS.

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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

REPUBLIC OF KAZAKHSTAN,
Plaintiff,

Case No. 2:22-cv-00509-JCM-BNW

BIG SKY ENERGY CORPORATION,

Defendant.

REQUEST FOR ENTRY OF CLERK'S DEFAULT AGAINST DEFENDANT BIG SKY ENERGY CORPORATION

To: The Clerk of the Above-Captioned Court

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Republic of Kazakhstan ("<u>Plaintiff</u>") hereby requests that the Clerk of the above-entitled Court enter default in this matter against Defendant Big Sky Energy Corporation ("<u>Defendant</u>"), a Nevada corporation, on the ground that Defendant has failed to appear or answer Plaintiff's Complaint within the time prescribed by the Federal Rules of Civil Procedure. On April 25, 2022, Plaintiff served Defendant with the Summons (ECF No. 5) and Complaint (ECF No. 1) as well as the Declaration of Steven

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1 Cooper and exhibits thereto (ECF Nos. 2-4), as evidenced by the Proof of Service. ECF No. 17. 2 Accordingly, Defendant was required to appear or otherwise defend 21 days from 3 the date of service, which was May 16, 2022. See Fed. R. Civ. P. 12. 4 As of June 8, 2022, Defendant has not appeared or otherwise responded to the Complaint. 5 See Ex. 1 (Gettel Decl.) at ¶¶ 4-5. Therefore, entry of default is proper in this case. 6 7 Dated: June 8, 2022 SNELL & WILMER L.L.P. 8 9 By: /s/ Alex L. Fugazzi Alex L. Fugazzi, Esq. 10 Erin M. Gettel, Esq. 3883 Howard Hughes Parkway, Suite 1100 11 Las Vegas, Nevada 89169 12 Steven Cooper, Esq. (*Pro Hac Vice*) Samuel Kadosh, Esq. (*Pro Hac Vice*) 13 Jonathan Gordon, Esq. (*Pro Hac Vice*) REED SMITH LLP 14 599 Lexington Avenue, Floor 22 New York, New York 10022 15 Attorneys for Plaintiff Republic of Kazakhstan 16 17 18 19 20 21 22 23 24 25 26 27 28

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CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically transmitted the foregoing REQUEST FOR ENTRY OF CLERK'S DEFAULT AGAINST DEFENDANT BIG SKY ENERGY CORPORATION to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all counsel being registered to receive Electronic Filing.

DATED this 8th day of June, 2022

/s/ D'Andrea Dunn
An employee of SNELL & WILMER L.L.P.

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