	Case 2:22-cv-01130-TSZ Documer	nt 21 Filed 12/02/22 Page 1 of 3	
1		The Honorable Thomas S. Zilly	
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8	IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON		
9	AT SEA		
10	UNITED STATES OF AMERICA,	) Case No. 2:22-cv-01130-TSZ	
11	Plaintiff,	) UNITED STATES' MOTION FOR	
12	v.	) ENTRY OF DEFAULT AGAINST ) STOLL FAMILY TRUST AND	
13	GLEN A. STOLL; STOLL FAMILY TRUST; DIRECTOR OF THE FAMILY DEFENSE	) DIRECTOR OF THE FAMILY ) DEFENSE LEAGUE	
14	LEAGUE a.k.a. FAMILY DEFENSE LEAGUE a.k.a. FAMILY DEFENSE	) Note on Motions Calendar:	
15	NETWORK a.k.a. FAMILY DEFENSE FUND; and SNOHOMISH COUNTY,	) December 2, 2022	
16	Defendants.		
17	The United States of America, by and thro	) ugh undersigned counsel, hereby requests that	
18	The United States of America, by and through undersigned counsel, hereby requests that the clerk enter default against the Stoll Family Trust and the Director of the Family Defense		
19	League ("Family Defense League") under Fed. R. Civ. P. 55(a) and 77(c)(2), and LCR 55(a). In		
20	support of this motion, the United States provides as follows:		
21	1. The United States commenced this action against Glen A. Stoll, the Stoll Family		
22	Trust, the Family Defense League, and Snohomish County on August 12, 2022. Dkt. # 1.		
23	2. Service of process upon the Stoll Family Trust was completed on October 16,		
24	2022. Dkt. # 10; Fed. R. Civ. P. 4(h).		
25 26	3. Service of process upon the Family	Defense League was completed on November	
26 27	3, 2022. Dkt. # 16; Fed. R. Civ. P. 4(h).		
27	United States' Mot. for Entry of Default Against Stoll Family Trust and Director of the Family Defense League (Case No. 2:22-cv-01130-TSZ)	<b>U.S. DEPARTMENT OF JUSTICE</b> Tax Division, Western Region P.O. Box 683 Washington, D.C. 20044 Telephone: 202-616-3366	

4. Glen A. Stoll has filed three documents with the Court. *See* Dkt. ## 15, 18, and 19. To the extent Stoll attempts to represent the Stoll Family Trust and/or Family Defense League, he cannot do so. The Stoll Family Trust and Family Defense League are artificial entities and their interests in a court proceeding must be represented by a person acting on its behalf. Representing another person or entity in court is the practice of law. To practice law, one must be an attorney. R.C.W. 2.48.170. Thus, the Stoll Family Trust and Family Defense League appearing in court proceedings must be represented by an attorney. Stoll admittedly is not an attorney (Dkt. # 19 at 8) and therefore cannot represent the Stoll Family Trust or Family Defense League.

To date, the Stoll Family Trust and Family Defense League have not filed a
responsive pleading to the Complaint. *See* Docket for Case No. 2:22-cv-01130-TSZ.
Accordingly, the Stoll Family Trust and Family Defense League have defaulted.

WHEREFORE, the United States prays that the Clerk of the United States District Court
for the Western District of Washington enter default against the Stoll Family Trust and Family
Defense League.

Respectfully submitted this 2nd day of December, 2022.

DAVID A. HUBBERT Deputy Assistant Attorney General

/s/ Yen Jeannette Tran YEN JEANNETTE TRAN DYLAN C. CERLING Trial Attorney, Tax Division U.S. Department of Justice P.O. Box 683 Washington, D.C. 20044 202-616-3366 (v) (Tran) 202-616-3395 (v) (Cerling) 202-307-0054 (f) Y.Jeannette.Tran@usdoj.gov Dylan.C.Cerling@usdoj.gov

Attorneys for the United States of America

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	Case 2:22-cv-01130-TSZ Document 21 Filed 12/02/22 Page 3 of 3			
1	CERTIFICATE OF SERVICE			
2	I hereby certify that on this 2nd day of December, 2022, I electronically filed the			
3	foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:			
4 5	Rebecca J. Guadamud (Rebecca.Guadamud@snoco.org) Attorneys for Snohomish County			
5	I further certify that on the same date, I caused a true and complete copy of the foregoing			
6 7	document to be served by first-class mail, postage prepaid, to the following at the following addresses:			
8	Glen A Stoll			
8 9	c/o Director of the Family Defense League 16910 – 59th Avenue NE, Ste. 210 Arlington WA 08223			
10	Arlington, WA 98223			
11	<u>/s/ Yen Jeannette Tran</u> YEN JEANNETTE TRAN Trick Attempty, Tay Division			
12	Trial Attorney, Tax Division U.S. Department of Justice			
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	United States' Mot. for Entry of Default Against Stoll Family Trust and Director of the Family Defense League (Case No. 2:22-cv-01130-TSZ)			