

Honorable Richard A. Jones

MOTIONS FOR DEFAULT JUDGMENT

Judge Jones will deny motions for default judgment that do not provide sufficient information for the Court to enter judgment. Plaintiffs should be guided by the following considerations when preparing motions for default judgment:

1. Plaintiff shall comply with Local Civil Rule 55.
2. Plaintiff shall support a motion for default judgment with a declaration.
3. Plaintiff shall separately state the amounts owing on the principal claim, liquidated damages (if applicable), pre- and post-judgment interest on the principal claim (if applicable), and reasonable attorneys' fees (if applicable).
4. Plaintiff shall provide a concise explanation of how all amounts were calculated. If the Court is not certain about how a particular amount was calculated, the Court will not award that amount.
5. Plaintiff shall provide evidence establishing the amount of the principal claim. If the claim is based on one or more contracts, the relevant portion(s) of the contract(s) shall be attached to the declaration. If further information is required to determine the amount of the principal claim (*e.g.*, the number of hours worked under an employment contract), Plaintiff shall provide that information.

6. If Plaintiff seeks liquidated damages, Plaintiff shall provide evidence establishing an entitlement to liquidated damages and any other information needed to determine the amount of liquidated damages.
7. If an interest rate other than that provided by 28 U.S.C. § 1961 applies, Plaintiff shall state the rate and the reasons for applying it.
8. Plaintiff shall include all interest calculations in the motion for default judgment. For prejudgment interest, Plaintiff shall state the date on which prejudgment interest began to accrue and the basis for selecting that date.
9. If Plaintiff seeks attorneys' fees, Plaintiff must state the basis for an award of attorneys' fees and must include a declaration from Plaintiff's counsel establishing the reasonable amount of fees to be awarded.