

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

GLOBAL DIRECT SALES, LLC, PENOBSCOT )  
INDIAN NATION, CHRISTOPHER RUSSELL )  
and RYAN HILL, )

Case No.: 8:08-cv-02468

Plaintiffs, )

-v- )

AARON KROWNE, individually and d/b/a THE )  
MORTGAGE LENDER IMPLD-O-METER and )  
ML-IMPLD.COM, KROWNE CONCEPTS, )  
INC., IMPLD-EXPLOD HEAVY )  
INDUSTRIES, INC., JUSTIN OWINGS, KRISTA )  
RAILEY, STREAMLINE MARKETING, INC. and )  
LORENA LEGGETT, )

Assigned:  
Hon. Deborah K. Chasanow

Defendants. )

**PLAINTIFFS' MOTION FOR A DEFAULT JUDGMENT,  
SUMMARY JUDGMENT AND A PERMANENT INJUNCTION**

PLEASE TAKE NOTICE, that Plaintiffs, the Penobscot Indian Nation ("PIN"), Global Direct Sales, LLC, Christopher Russell and Ryan Hill, by their attorneys, Kantrowitz, Goldhamer & Graifman, P.C. and the Mason, LLP, hereby move pursuant of the Federal Rules of Civil Procedure, on November 4, 2011, or as soon thereafter as counsel can be heard, for an Order: 1) granting a default judgment against Defendants Krowne Concepts, Inc. and Implode-Explode Heavy Industries, Inc.; 2) granting summary judgment against Defendants Krowne Concepts, Inc. and Implode-Explode Heavy Industries, Inc.; 3) upon entering a default judgment and/or granting summary judgment against Defendants Krowne Concepts, Inc. and Implode-Explode Heavy Industries, Inc., scheduling this matter for a hearing on damages; 4) entering a

permanent injunction enjoining Defendants from publishing any version of the article; and 5) for such other, further and different relief as this Court deems just and proper.

This motion is based upon the annexed Declaration in Support of Christopher Russell, Declaration of Michael L. Braunstein with Exhibits, Declaration of Krista Railey, accompanying Memorandum of Law and all prior proceedings in this action.

Plaintiffs respectfully request oral argument if this motion is opposed.

Dated: September 28, 2011

**KANTROWITZ, GOLDHAMER  
& GRAIFMAN, P.C.**

By: 

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