

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**METROPOLITAN AFRICAN METHODIST  
EPISCOPAL CHURCH,**

**Plaintiff,**

**v.**

**PROUD BOYS INTERNATIONAL, L.L.C.,  
ENRIQUE TARRIO, JOHN DOES #1-8,**

**Defendants.**

**No. 2021 CA 000004 B  
Judge Heidi M. Pasichow  
Next Court Date: Apr. 9,  
2021, 9:30 AM  
Event: Initial Conference**

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AGAINST HENRY  
"ENRIQUE" TARRIO AND SUPPLEMENTAL MOTION FOR ENTRY OF  
DEFAULT AGAINST PROUD BOYS INTERNATIONAL, LLC**

Pursuant to D.C. Superior Court Civil Rule 55(a) and this Court's January 27, 2020 Order ("the Order"), Plaintiff Metropolitan African Methodist Episcopal Church ("Metropolitan AME"), by and through its undersigned counsel, hereby respectfully moves for entry of default against Defendant Henry "Enrique" Tarrio ("Tarrio") and Proud Boys International, LLC ("PBI").

**I. Introduction**

Because Tarrio failed to timely respond to a validly served complaint, the Court should enter a default pursuant to Rule 55. Metropolitan AME personally served Tarrio with the Complaint on January 5, 2021, and has photographic evidence of that service. By order of this Court, Tarrio was also allotted more than two weeks beyond the requisite twenty-one days to respond to the Complaint. Notwithstanding the Court's *sua sponte* grant of additional time, Tarrio has failed to file a response—or even appear—in this matter. Accordingly, an order of default against Tarrio is appropriate and should be entered forthwith.

Additionally, because Tarrío is an officer of the Proud Boys fraternity (the “Proud Boys”) and therefore an appropriate agent for service on PBI—and because, as discussed in our motion for entry of default against PBI filed February 5, 2021, PBI has also failed to timely respond to the Complaint—the personal service of the Complaint on Tarrío is a further reason for default to be entered against PBI.

#### **I. The Court Should Enter a Default Against Defendant Enrique Tarrío**

Pursuant to Rule 12 of the District of Columbia Rules of Civil Procedure, defendants in a litigation must file a responsive pleading within twenty-one days after being served with a summons and complaint. D.C. R. Civ. P. 12(a)(1)(A). Once a party has failed to do so, “the clerk or the court must enter the party’s default.” D.C. R. Civ. P. 55(a)(1). Under the Rules, and as this Court has acknowledged, Tarrío was required to file his responsive pleadings by January 26, 2021. To date, he has failed to do so.

On January 4, 2021, Metropolitan AME filed its complaint (the “Complaint”) against Tarrío and other defendants. *See Metropolitan African Methodist Episcopal Church v. Proud Boys International, L.L.C., et al.*, Compl. Metropolitan AME served Tarrío with the summons and Complaint through personal service on January 5, 2021 as he was released from police custody.<sup>1</sup> *See* Affidavit of Service of Summons & Complaint on Enrique Tarrío (“Exhibit A”). Proof of service was filed with the Court on January 11, 2021. *Id.*

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<sup>1</sup> On January 4, 2021, Tarrío was arrested in D.C. and charged with one misdemeanor count of destruction of property in connection with the burning of another D.C. Black church’s Black Lives Matter banner on December 12, 2020. Jennifer Steinhauer, *et al.*, “Leader of Proud Boys, a Far-Right Group, Is Arrested as D.C. Braces for Protests,” N.Y. Times, Jan. 6, 2021, <https://www.nytimes.com/2021/01/04/us/politics/enrique-tarrío-proud-boys.html> (last visited Jan. 30, 2021). Tarrío was also charged with two felony counts of possession of a high capacity feeding device. *Id.* He allegedly possessed two high capacity firearm magazines in D.C. at the time of his arrest, which was two days before the attack on the U.S. Capitol. *Id.*

On January 27, 2021, the Court issued an Order in which it addressed, among other things, Tarrío's failure to file a responsive pleading within the requisite twenty-one days, and directed him to file a motion for leave to file a responsive pleading on or before February 12, 2021. *Metropolitan African Methodist Episcopal Church v. Proud Boys International, L.L.C., et al.*, Order at 5 (Jan. 27, 2021). The Court made clear that absent the filing of such a motion for leave, Plaintiff could proceed by filing a motion requesting that a default be entered against Tarrío. *Id.* Despite being given an additional seventeen days to respond, Tarrío has yet to file a responsive pleading—or even a notice of appearance—in this action.

The deadline for filing a responsive pleading has long passed; so too has the Court's extension permitting Tarrío an opportunity to explain his delay. Given Tarrío's failure to file a responsive pleading within the deadlines provided by the Rules and this Court, a default should be entered against him.

## **II. The Court Should Enter a Default Against Defendant PBI**

On February 5, 2021, Metropolitan AME moved for entry of default against Defendant PBI after PBI failed to file a responsive pleading within twenty-one days of service of the summons and Complaint in this action. As the Court is aware, the registered service agent for PBI, Jason Van Dyke, sent multiple e-mails to the Court and to counsel for Metropolitan AME stating that he was no longer PBI's service agent and providing a variety of dates on which he claims to have formally resigned, including (a) January 4, 2021, the day the Complaint was filed, (b) January 10, 2021, the day he forwarded the Complaint to Tarrío, and (c) February 5, 2021, the day Metropolitan AME moved for entry

of default against PBI.<sup>2</sup> Mr. Van Dyke has since communicated by e-mail to counsel for Metropolitan AME that he filed paperwork with the Texas Secretary of State on February 10, 2021 to initiate termination of both PBI and an affiliated entity, Proud Boys of Texas LLC.<sup>3</sup>

Mr. Van Dyke's most recent communications and his representations make clear that, notwithstanding any subsequent efforts, PBI was an active entity both at the time of the events described in Metropolitan AME's Complaint and at the time of service. Moreover, resignation of a service agent does not become effective until at least thirty-one days after paperwork is filed. D.C. Code § 29-104.10(b); Tex. Bus. Orgs. Code § 5.204(a), (d). Accordingly, Mr. Van Dyke's most recent communication, which states that he did not resign as an agent of PBI until February 5 of this year, conclusively determines that he remained PBI's service agent when Metropolitan AME served the summons and Complaint on January 6, 2021. Service on Mr. Van Dyke on January 6, 2021 was proper.

For the avoidance of doubt, however, service on PBI was also properly accomplished by personal service on Tarrío on January 5, 2021. Tarrío was the Chairman of the Proud Boys at the time he was served with a summons and Complaint. Under Article I, Section 2 of PBI's Bylaws, PBI is part of the Proud Boys. Compl., Ex. 1 at Art. I, § 2. Accordingly, Tarrío is an officer of PBI and was a proper recipient for service.<sup>4</sup>

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<sup>2</sup> Feb. 5, 2021 E-mail from J. Van Dyke to A. Ehrlich *et al.* ("Exhibit B") (stating that Van Dyke faxed resignation papers that same day and attaching resignation documents dated January 4 and January 10, 2021).

<sup>3</sup> Feb. 11, 2021 E-mail with attachments from J. Van Dyke to A. Ehrlich ("Exhibit C").

<sup>4</sup> D.C. R. Civ. P. 4(h)(1)(B) ("[d]elivering a copy of the summons, complaint, Initial Order . . . to an officer, a managing or general agent, or any other agent authorized by appointment or by law to receive service of process and if the agent is one authorized by statute and the statute so requires by also mailing a copy of each to the defendant. . .").

For those reasons—as well as those provided in Metropolitan AME’s February 5, 2021 motion—default should be entered against PBI.

**CONCLUSION**

For the foregoing reasons, Metropolitan AME respectfully requests that the Court grant its motions and enter orders of default against Defendants Tarrío and PBI.

Dated: February 16, 2021

**LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS UNDER LAW**

By: /s/ David Brody  
Jon Greenbaum (D.C. Bar No. 489887)  
Arusha Gordon (D.C. Bar No. 1035129)  
David Brody (D.C. Bar No. 1021476)  
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*Co-Counsel for Plaintiff Metropolitan African  
Methodist Episcopal Church*

**WASHINGTON LAWYERS' COMMITTEE  
FOR CIVIL RIGHTS & URBAN AFFAIRS**

By: /s/ Jonathan M. Smith  
Jonathan M. Smith (D.C. Bar No. 396578)  
Kaitlin Banner (D.C. Bar No. 1000436)  
Jacqueline Kutnik-Bauder\*  
700 14th Street NW, Suite 400  
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Tel: 202-319-1000  
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Email: jonathan\_smith@washlaw.org  
kaitlin\_banner@washlaw.org  
jacqueline\_kutnik-bauder@washlaw.org

*\* Pro hac vice application pending*

*Co-Counsel for Plaintiff Metropolitan African  
Methodist Episcopal Church*

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Daniel J. Kramer  
Daniel J. Kramer (*pro hac vice*)  
Andrew J. Ehrlich (*pro hac vice*)  
Erin J. Morgan (*pro hac vice*)  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Tel: 212-373-3000  
Fax: 212-757-3990  
Email: dkramer@paulweiss.com  
aehrich@paulweiss.com  
ejmorgan@paulweiss.com

By: /s/ Jeannie S. Rhee  
Jeannie S. Rhee (D.C. Bar No. 464127)  
2001 K Street, NW  
Washington, DC 20006-1047  
Tel: (202) 223-7300  
Fax: (202) 223-7420  
Email: jrhee@paulweiss.com

*Co-Counsel for Plaintiff Metropolitan African  
Methodist Episcopal Church*

**RULE 12-I(a) CERTIFICATION**

Defendants Enrique Tarrío and Proud Boys International, L.L.C. are not before the Court and therefore Plaintiff Metropolitan African Methodist Episcopal Church is not required to seek their consent.

/s/ Jeannie S. Rhee

Jeannie S. Rhee

D.C. Bar No. 464127

**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2021, a copy of the foregoing was served on Defendants Enrique Tarrío and Proud Boys International, L.L.C. by mail to their last known addresses.

/s/ Jeannie S. Rhee

Jeannie S. Rhee

D.C. Bar No. 464127



# **EXHIBIT A**

IN THE SUPERIOR COURT OF DISTRICT OF COLUMBIA CIVIL DIVISION - CIVIL ACTIONS BRANCH

METROPOLITAN AFRICAN METHODIST EPISCOPAL CHURCH Case Number: 2021 CA 000004 B  
Plaintiff

vs

PROUD BOYS INTERNATIONAL, LLC, et al  
Defendant

AFFIDAVIT OF  
SERVICE

Now comes, Mike Lievano the undersigned and does hereby swear and affirm, affiant is a Private Process Server and disinterested Person over the age of eighteen. Affiant is not a party in the above styled cause and has a legal domicile of Washington, DC.

I, Mike Lievano certify that on, **01/05/2021**, at **3:26 PM**, I served a copy of the within **Summons, Information Sheet, Complaint with Exhibits, Initial Order and Addendum** upon the within named **Enrique Tarrío**, in the following manner,

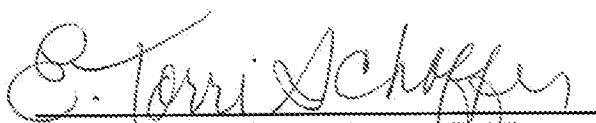
**(xx) PERSONAL SERVICE:** Through Personal Delivery of each document, a true copy to the party named herein.

Said service was effected at the following location: **300 Indiana Avenue, NW, Washington, DC 20001 In The Lobby of the Release Center of the DC Jail.**

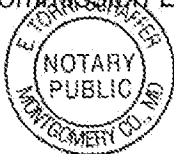
I, Mike Lievano describe the individual accepting service **Enrique Tarrío** as follows: **Enrique Tarrío** is a Hispanic Male, approximately 35 yrs. old, with Bald hair, approximately 5'8" and weighing 170 lbs

I, Mike Lievano certify that my statements, contained within the foregoing affidavit are true, correct and my free act and deed. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

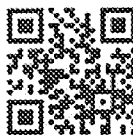
Sworn to and subscribed before me on  
01/06/2021



E. Torri Schaffer, Notary Public  
Commission Expires 11/29/2024



E. TORRI SCHAFFER  
Notary Public, State of Maryland  
County of Montgomery  
My Commission Expires 11/29/2024



52216



Mike Lievano  
P.O. Box 18647  
Washington, DC 20036  
202-296-0222

# **EXHIBIT B**

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**From:** jason@vandykelegalgroup.com <jason@vandykelegalgroup.com>  
**Date:** Friday, Feb 05, 2021, 9:23 PM  
**To:** Ehrlich, Andrew J <ae Ehrlich@paulweiss.com>, 'Pasichow, Heidi M. (JAA - Simms, Cheryl A.)' <Cheryl.Simms@dcsc.gov>, Kramer, Daniel J <dkramer@paulweiss.com>, Morgan, Erin J <eimorgan@paulweiss.com>, Jacqueline Kutnik-Bauder <jacqueline.kutnik.bauder@washlaw.org>  
**Cc:** 'Pasichow, Heidi M. (Law Clerk - McDonald, Savannah)' <Savannah.McDonald@dcsc.gov>, Rhee, Jeannie S <jrhee@paulweiss.com>, JudgePasichowChambers@dcsc.gov <JudgePasichowChambers@dcsc.gov>  
**Subject:** RE: Sanctions Hearing Request [Metropolitan African Methodist Episcopal Church v. Proud Boys Int'l LLC, et al, No. 2021 CA 00004 B]

To All Whom It May Concern:

I do apologize for addressing my past correspondence to the Court directly, it was intended for the Clerk. I regret the error.

I tendered my resignation as registered agent for the LLC on January 4, 2021 due to Mr. Tarrío's failure to find a replacement agent and take control of the organization in November of 2018. I took the liberty of checking this morning to see if my resignation – mailed that same day – had been processed by the Texas Secretary of State and found that it had not. I send a new one – this time by fax – to the Texas Secretary of State this morning. A copy of both is attached. I have repeatedly informed counsel that I have nothing to do with the Proud Boys, have had nothing to do with them since 2018, and that all information in my possession points to the fact that they have sued the wrong entity. In fact, in my prior correspondence with the Clerk, I provided copies of several leads concerning LLC's in Florida – in which Mr. Tarrío has an ownership interest – which appear to be the proper parties to this suit.

Since it appears to be the only way to resolve this dispute, I will begin the process of dissolving said limited liability company permanently on Monday morning. It has no assets and has never had any assets.

## The Van Dyke Legal Group

**Jason Van Dyke**  
**Attorney & Counselor at Law**  
PO Box 2618  
Decatur, TX 76234  
P – (940) 305-9242

Licensed to practice law in Texas, Georgia, and the District of Columbia.

---

**From:** Ehrlich, Andrew J <aehlich@paulweiss.com>  
**Sent:** Friday, February 5, 2021 6:57 PM  
**To:** jason@vandykelegalgroup.com; 'Pasichow, Heidi M. (JAA - Simms, Cheryl A.)' <Cheryl.Simms@dcsc.gov>; Kramer, Daniel J <dkramer@paulweiss.com>; Morgan, Erin J <ejmorgan@paulweiss.com>; Jacqueline Kutnik-Bauder <jacqueline\_kutnik-bauder@washlaw.org>  
**Cc:** 'Pasichow, Heidi M. (Law Clerk - McDonald, Savannah)' <Savannah.McDonald@dcsc.gov>; Rhee, Jeannie S <jrhee@paulweiss.com>; JudgePasichowChambers@dcsc.gov  
**Subject:** RE: Sanctions Hearing Request [Metropolitan African Methodist Episcopal Church v. Proud Boys Int'l LLC, et al, No. 2021 CA 00004 B]

Dear Judge Pasichow,

I write in response to Mr. Van Dyke's e-mail of earlier today. As laid out in our motion for entry of default, a copy of which is attached, Mr. Van Dyke remains the sole registered agent for service of process for Defendant Proud Boys International, as reflected in the records of the Secretary of State of the State of Texas, checked as recently as today. In addition, Mr. Van Dyke's legal entity, the Van Dyke Organization LLC – on which letterhead he sent correspondence as recently as earlier this week, and of which he is the sole registered agent and managing member – is the “lawful successor organization” to JLVD Holdings LLC, which is listed as the sole manager of the defendant here, Proud Boys International LLC. As such, Plaintiff appropriately has served him with papers in this matter, and his threats made to counsel of disciplinary referral for serving such papers – when he is the registered agent for service – are entirely unfounded. We look forward to discussing these matters with the Court at the appropriate time.

Pursuant to Your Honor's Supplement to the General Order, attached please find electronic copies of the motion for entry of default and proposed order.

Respectfully,  
Andrew Ehrlich  
Counsel to Plaintiff

**Andrew J. Ehrlich** | Partner  
**Paul, Weiss, Rifkind, Wharton & Garrison LLP**  
1285 Avenue of the Americas | New York, NY 10019-6064

212 373 3166 (Direct Phone) | 917 405-7928 (Cell)  
212 492 0166 (Direct Fax)  
[aehrllich@paulweiss.com](mailto:aehrllich@paulweiss.com) | [www.paulweiss.com](http://www.paulweiss.com)  
Pronouns: He/Him/His

---

**From:** [jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com) <[jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com)>  
**Sent:** Friday, February 5, 2021 11:00 AM  
**To:** 'Pasichow, Heidi M. (JAA - Simms, Cheryl A.)' <[Cheryl.Simms@dcsc.gov](mailto:Cheryl.Simms@dcsc.gov)>; Kramer, Daniel J <[dkramer@paulweiss.com](mailto:dkramer@paulweiss.com)>; Ehrlich, Andrew J <[aehrllich@paulweiss.com](mailto:aehrllich@paulweiss.com)>; Morgan, Erin J <[ejmorgan@paulweiss.com](mailto:ejmorgan@paulweiss.com)>; Jacqueline Kutnik-Bauder <[jacqueline\\_kutnik-bauder@washlaw.org](mailto:jacqueline_kutnik-bauder@washlaw.org)>  
**Cc:** 'Pasichow, Heidi M. (Law Clerk - McDonald, Savannah)' <[Savannah.McDonald@dcsc.gov](mailto:Savannah.McDonald@dcsc.gov)>; Rhee, Jeannie S <[jrhee@paulweiss.com](mailto:jrhee@paulweiss.com)>  
**Subject:** Sanctions Hearing Request

Dear Ms. Pasichow:

This morning the counsel for MAMEC had interrogatories delivered to my residence. I do not know how many times I have to tell them that I am not the attorney for the Proud Boys, that I am not authorized to take any action on behalf of the Proud Boys, and that I am not the proper party for service of these documents.

I am requested that the court set a sanctions hearing in this case. I would like to be noticed and I would like to appear and request that Plaintiff's counsel be sanctioned if they continue to harass me in this manner. At this point, I believe the only remedy available to me is for the Court to order Plaintiff's counsel to conduct its due diligence and leave me out of their lawsuit.

## The Van Dyke Legal Group

**Jason Van Dyke**  
**Attorney & Counselor at Law**  
PO Box 2618  
Decatur, TX 76234  
P – (940) 305-9242

Licensed to practice law in Texas, Georgia, and the District of Columbia.

---

**From:** [jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com) <[jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com)>  
**Sent:** Wednesday, January 27, 2021 3:00 PM  
**To:** 'Pasichow, Heidi M. (JAA - Simms, Cheryl A.)' <[Cheryl.Simms@dcsc.gov](mailto:Cheryl.Simms@dcsc.gov)>; 'dkramer@paulweiss.com' <[dkramer@paulweiss.com](mailto:dkramer@paulweiss.com)>; 'aehrllich@paulweiss.com' <[aehrllich@paulweiss.com](mailto:aehrllich@paulweiss.com)>; 'ejmorgan@paulweiss.com' <[ejmorgan@paulweiss.com](mailto:ejmorgan@paulweiss.com)>; 'Jacqueline\_kutnik-bauder@washlaw.org' <[jacqueline\\_kutnik-bauder@washlaw.org](mailto:jacqueline_kutnik-bauder@washlaw.org)>  
**Cc:** 'Pasichow, Heidi M. (Law Clerk - McDonald, Savannah)' <[Savannah.McDonald@dcsc.gov](mailto:Savannah.McDonald@dcsc.gov)>  
**Subject:** RE: METROPOLITAN AFRICAN METHODIST EPISCOPAL CHURCH v. PROUD BOYS INTERNATIONAL, LLC, et al.

Dear Ms. Simms:

I respectfully request to stop being copied on these e-mails. I also request to stop receiving any kind of "e-Service" that I may have inadvertently been signed up for in this case.

I have sent multiple communications to counsel for Metropolitan African Methodist Episcopal Church stating that (a) I do not represent any of the Defendants and have not done so since November of 2018; (b) I have no intention of representing any Defendant in this lawsuit; and (c) Proud Boys International LLC is a defunct entity with no assets. I have stated this repeatedly to Plaintiffs counsel, and frankly, they are either not listening or they do not care.

I did receive service of process in this case and it was forwarded immediately to Henry Enrique Tarrío, who is the current chairman of the Proud Boys.

I have had nothing to do with the Proud Boys since November of 2018.

As I myself am not a Defendant, nor am I authorized to represent any Defendant, I cannot make any filings in this case and I cannot represent any party at any hearing in this case.

I want to ensure that the Court is aware of this, because I certainly do not want to create the impression that my absence from this lawsuit is intended as disrespect toward the Court or neglect of an obligation to a client. Frankly, it would be a violation of the rules of professional conduct for me to participate at this time.

### **The Van Dyke Legal Group**

**Jason Van Dyke**  
**Attorney & Counselor at Law**  
PO Box 2618  
Decatur, TX 76234  
P - (940) 305-9242

Licensed to practice law in Texas, Georgia, and the District of Columbia.

---

**From:** Pasichow, Heidi M. (JAA - Simms, Cheryl A.) <Cheryl.Simms@dcs.gov>  
**Sent:** Wednesday, January 27, 2021 2:49 PM  
**To:** 'dkramer@paulweiss.com' <dkramer@paulweiss.com>; 'aehrlich@paulweiss.com' <aehrlich@paulweiss.com>; 'ejmorgan@paulweiss.com' <ejmorgan@paulweiss.com>; 'Jacqueline\_kutnik-bauder@washlaw.org' <jacqueline\_kutnik-bauder@washlaw.org>; 'jason@vandykelegalgroup.com' <jason@vandykelegalgroup.com>  
**Cc:** Pasichow, Heidi M. (Law Clerk - McDonald, Savannah) <Savannah.McDonald@dcs.gov>  
**Subject:** METROPOLITAN AFRICAN METHODIST EPISCOPAL CHURCH v. PROUD BOYS INTERNATIONAL, LLC, et al.

Please see attached Order and Remote Instruction issued by Judge Heidi M. Pasichow.

Thank you,

Cheryl A. Simms  
Judicial Administrative Assistant  
to the Honorable Heidi M. Pasichow  
500 Indiana Avenue, NW, Chambers 1540  
Washington, D.C. 20001  
(202) 879-1472  
[Cheryl.Simms@dccs.system.gov](mailto:Cheryl.Simms@dccs.system.gov)

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This message is intended only for the use of the Addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. If you have received this communication in error, please erase all copies of the message and its attachments and notify us immediately.



**Form 402  
(Revised 01/10)**

Submit in duplicate to:  
Secretary of State  
P.O. Box 13697  
Austin, TX 78711-3697  
512 463-5555  
FAX: 512/463-5709  
**Filing Fee: No fee**



This space reserved for office use.

## Resignation of Registered Agent

The undersigned person, currently listed in the records of the secretary of state as the registered agent authorized to receive service of process for the entity named below, submits this resignation of appointment.

### Entity Information

1. The name of the entity for which the undersigned is designated as registered agent is:

Proud Boys International L.L.C.

State the name of the entity as currently shown in the records of the secretary of state.

2. The file number issued by the secretary to the entity making the appointment is: 803172528

### Statement of Notice

3. Written notice of the resignation has been given by the undersigned registered agent to the entity at the address of the entity most recently known by the agent. The address to which the notice was mailed or delivered is:

5730 NW 2nd Street

*Street/Mailing Address*

Miami

*City*

FL

*State*

USA

*Country*

33126

*Zip/Postal Code*

4. The date on which the written notice was given to the entity was: 1/4/2021

*mm/dd/yyyy*

### Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

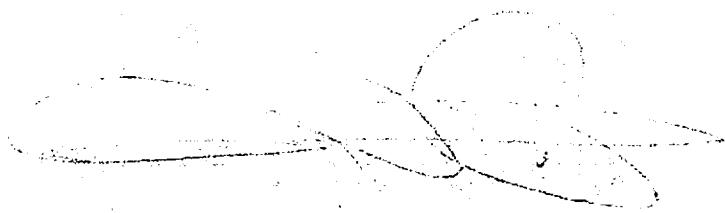
Date: 1/4/2021

A handwritten signature in black ink, appearing to read "Jason Lee Van Dyke", written over a horizontal line.

*Signature of resigning registered agent*

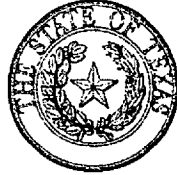
Jason Lee Van Dyke

*Printed or typed name of resigning registered agent*



**Form 402**  
**(Revised 01/10)**

Submit in duplicate to:  
Secretary of State  
P.O. Box 13697  
Austin, TX 78711-3697  
512 463-5555  
FAX: 512/463-5709  
**Filing Fee: No fee**



This space reserved for office use.

**Resignation of Registered  
Agent**

The undersigned person, currently listed in the records of the secretary of state as the registered agent authorized to receive service of process for the entity named below, submits this resignation of appointment.

**Entity Information**

1. The name of the entity for which the undersigned is designated as registered agent is:

Proud Boys International LLC

State the name of the entity as currently shown in the records of the secretary of state.

2. The file number issued by the secretary to the entity making the appointment is: 803172528

**Statement of Notice**

3. Written notice of the resignation has been given by the undersigned registered agent to the entity at the address of the entity most recently known by the agent. The address to which the notice was mailed or delivered is:

5730 NW 2nd Street

*Street/Mailing Address*

Miami

*City*

FL

*State*

USA

*Country*

33126

*Zip/Postal Code*

4. The date on which the written notice was given to the entity was: 01/10/2021  
*mm/dd/yyyy*

**Execution**

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument.

Date: 2/5/2021

A handwritten signature in black ink, appearing to read "Jason L Van Dyke", written over a horizontal line.

Signature of resigning registered agent

Jason L Van Dyke

Printed or typed name of resigning registered agent

# The Van Dyke Legal Group

Criminal Defense · Commercial Debt Collection · Civil Litigation

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January 10, 2021

Henry Enrique Tarrío  
5730 NW 2<sup>nd</sup> St  
Miami, FL 33126

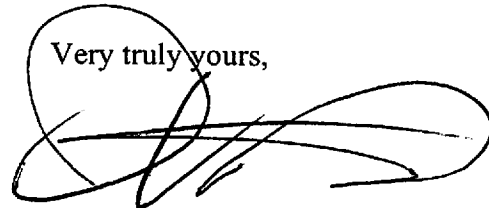
\  
Dear Mr. Tarrío:

I was served with the enclosed papers on January 6, 2021 in my capacity as registered agent for “Proud Boys International LLC”. As you are aware, I have not been a member of the organization for some time and have not represented the organization as its attorney in well over two years. Although I started “Proud Boys International LLC” during the period in which the organization was transitioning to a more formalized leadership structure after the departure of Mr. McInnes, it is my understanding that there are no assets of any kind in the name of this company and that the operating of the Proud Boys has either been through different limited liability companies or none at all. Accordingly, what – if any – defense shall be made to this lawsuit is completely within your discretion and the discretion of your attorneys.

Please note that – in accordance with our agreement of December 2018 – all Proud Boys and Proud Boy chapters continue to enjoy full permission to utilize the Proud Boys name, to create Proud Boys merchandise, and to prosecute violations of the trademark as you see fit. Naturally, this permission is granted without prejudice to my right to engage in similar activities, although I have no intention of doing so at this time or at any time in the foreseeable future.

As I am a licensed DC attorney, I will be notifying opposing counsel that I had resigned as registered agent for this LLC prior to being served with these papers, that I have no affiliation with the group, and that it is a defunct LLC with no assets.

Very truly yours,



Jason L. Van Dyke  
Attorney & Counselor at Law

# **EXHIBIT C**

---

**From:** jason@vandykelegalgroup.com <jason@vandykelegalgroup.com>  
**Date:** Thursday, Feb 11, 2021, 8:07 AM  
**To:** Ehrlich, Andrew J <aehrlich@paulweiss.com>  
**Subject:** Your Request for Entry of Default

Dear Mr. Ehrlich,

I received your motion for entry of default in the mail today. I compliment your office on doing something I did not previously know was possible: turning a motion that is normally only several sentences long into one that is five pages long with thirteen exhibits. While I certainly understand that the COVID-19 pandemic has made things difficult on all of us, I find it abhorrent that some members of the legal profession are taking advantage of their clients during this pandemic by billing excessive amounts for legal work, copying expenses, and postage expenses (not one of my clients has ever received a bill for copying or postage). It is clear to me that more drastic action on my part is necessary to prevent your office from wasting the resources of both your client and the judiciary during the pandemic.

The attachments to this e-mail should provide a final remedy both to that problem and the deforestation caused by your office inundating me with documents which I am not authorized to receive on behalf of an organization which I have not been a part of since 2018, which I have no further desire to be part a part, and which I will not be representing again under any circumstances.

Please find attached a copy of the certificates of termination for both Proud Boys International LLC and Proud Boys of Texas LLC, and the certificates of good standing for termination with respect to each of them, which have been electronically filed with the Texas Secretary of State. Please also find attached a receipt for the surrender of the Proud Boys trademark registration that I electronically filed with the USPTO earlier this evening.

I trust that, in addition to the publicity it has received, that this will satisfy your client. If it does not, I would respectfully suggest they take the more novel approach of naming proper parties to their

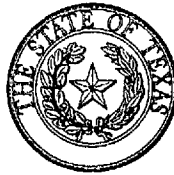
lawsuit.

**The Van Dyke Legal Group**

**Jason Van Dyke**  
**Attorney & Counselor at Law**  
PO Box 2618  
Decatur, TX 76234  
P - (940) 305-9242

Licensed to practice law in Texas, Georgia, and the District of Columbia.

**Form 651**  
**(Revised 05/11)**  
Submit in duplicate to:  
Secretary of State  
P.O. Box 13697  
Austin, TX 78711-3697  
512 463-5555  
FAX: 512 463-5709  
**Filing Fee: \$40**



This space reserved for office use.

**Certificate of Termination  
of a  
Domestic Entity**

**Entity Information**

1. The name of the domestic entity is: Proud Boys International LLC
2. The entity is organized as a Limited Liability Company under the laws of Texas.  
*e.g., for-profit corporation, limited partnership, etc.*
3. The date of formation of the entity is: 11/26/2018  
*mm/dd/yyyy*
4. The file number issued to the entity by the secretary of state is: 803172528

**Governing Persons**

5. The names and addresses of each of the entity's governing persons are: (see Item 5 instructions)

GOVERNING PERSON 1					
Name:	<u>JLVD Holdings LLC</u>				
Address:	<u>108 Durango Drive</u>	<u>Crossroads</u>	<u>TX</u>	<u>USA</u>	<u>76227</u>
	<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Country</i>	<i>Zip Code</i>

GOVERNING PERSON 2					
Name:	_____				
Address:	_____	_____	_____	_____	_____
	<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Country</i>	<i>Zip Code</i>

GOVERNING PERSON 3					
Name:	_____				
Address:	_____	_____	_____	_____	_____
	<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Country</i>	<i>Zip Code</i>

GOVERNING PERSON 4					
Name:	_____				
Address:	_____	_____	_____	_____	_____
	<i>Street or Mailing Address</i>	<i>City</i>	<i>State</i>	<i>Country</i>	<i>Zip Code</i>



**Event Requiring Winding Up**

(See Item 6 instructions.)

6. The nature of the event requiring winding up is set forth below: (You must select either A, B, C, D, or E.)

- A. A voluntary decision to wind up the entity has been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.
- B. The period of duration specified in the governing documents of the entity has expired.
- C. The occurrence of an event specified in the governing documents of the entity that requires the winding up, dissolution, or termination of the entity
- D. The occurrence of an event specified in the Texas Business Organizations Code that requires the winding up, dissolution, or termination of the entity

OR

- E. A court decree requiring the winding up, dissolution, or termination of the entity has been rendered under the provisions of the Texas Business Organizations Code or other law.

**Completion of Winding Up**

7. The filing entity has complied with the provisions of the Texas Business Organizations Code governing its winding up.

**Effectiveness of Filing** (Select either A, B, or C.)

- A.  This document becomes effective when the document is filed by the secretary of state.
- B.  This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: \_\_\_\_\_  
mm/dd/yyyy
- C.  This document takes effect upon the occurrence of the future event or fact, other than the passage of time. The 90<sup>th</sup> day after the date of signing is: \_\_\_\_\_  
mm/dd/yyyy

The following event or fact will cause the document to take effect in the manner described below:

**Tax Certificate**

(Required)

- Attached hereto is a certificate from the comptroller of public accounts that all taxes under title 2, Tax Code, have been paid.

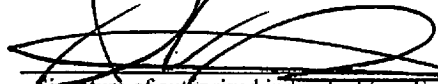
**Execution**

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: 2-10-21

By: The Van Dyke Organization LLC f/k/a JLVD Holdings LLC

Name of entity (see Execution instructions)



Signature of authorized individual (see Execution instructions)

Jason Lee Van Dyke

Printed or typed name of authorized individual



TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

Comptroller.Texas.Gov

February 10, 2021

PROUD BOYS INTERNATIONAL L.L.C.  
PO BOX 2618  
DECATUR TX 76234-6165

**Certificate of Account Status**


THE STATE OF TEXAS  
COUNTY OF TRAVIS

I, Glenn Hegar, Comptroller of Public Accounts of the State of Texas, DO HEREBY CERTIFY that according to the records of this office

PROUD BOYS INTERNATIONAL L.L.C.

has filed all required reports for taxes administered by the Comptroller under Title 2, Tax Code, and taxes reported due on those reports have been paid. This certificate must be filed with the Texas Secretary of State to legally end the entity's existence in Texas. This certificate is valid through December 31, 2021.

GIVEN UNDER MY HAND AND SEAL  
OF OFFICE in the City of  
Austin, this 10th day of  
February, 2021 A.D.

  
Glenn Hegar  
Texas Comptroller

Taxpayer number: 32069017773  
File number: 0803172528

NOTE: Failure by registered Texas entities to legally end existence with the Texas Secretary of State on or before the expiration of this certificate will result in additional franchise tax responsibilities. Texas entities not registered with the Texas Secretary of State and all out-of-state entities are responsible for franchise tax through the last date of business in this state.

**Form 651**  
**(Revised 05/11)**  
 Submit in duplicate to:  
 Secretary of State  
 P.O. Box 13697  
 Austin, TX 78711-3697  
 512 463-5555  
 FAX: 512 463-5709  
**Filing Fee: \$40**



This space reserved for office use.

**Certificate of Termination  
 of a  
 Domestic Entity**

**Entity Information**

1. The name of the domestic entity is: Proud Boys of Texas LLC
2. The entity is organized as a Limited Liability Company under the laws of Texas.  
*e.g., for-profit corporation, limited partnership, etc.*
3. The date of formation of the entity is: 11/20/2017  
mm/dd/yyyy
4. The file number issued to the entity by the secretary of state is: 802869051

**Governing Persons**

5. The names and addresses of each of the entity's governing persons are: (see Item 5 instructions)

**GOVERNING PERSON 1**

Name: JLVD Holdings LLC

Address: 108 Durango Drive Crossroads TX USA 76227  
Street or Mailing Address City State Country Zip Code

**GOVERNING PERSON 2**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or Mailing Address City State Country Zip Code

**GOVERNING PERSON 3**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or Mailing Address City State Country Zip Code

**GOVERNING PERSON 4**

Name: \_\_\_\_\_

Address: \_\_\_\_\_  
Street or Mailing Address City State Country Zip Code

**Event Requiring Winding Up**

(See Item 6 instructions.)

6. The nature of the event requiring winding up is set forth below: (You must select either A, B, C, D, or E.)

- A. A voluntary decision to wind up the entity has been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.
- B. The period of duration specified in the governing documents of the entity has expired.
- C. The occurrence of an event specified in the governing documents of the entity that requires the winding up, dissolution, or termination of the entity
- D. The occurrence of an event specified in the Texas Business Organizations Code that requires the winding up, dissolution, or termination of the entity

OR

- E. A court decree requiring the winding up, dissolution, or termination of the entity has been rendered under the provisions of the Texas Business Organizations Code or other law.

**Completion of Winding Up**

7. The filing entity has complied with the provisions of the Texas Business Organizations Code governing its winding up.

**Effectiveness of Filing** (Select either A, B, or C.)

- A.  This document becomes effective when the document is filed by the secretary of state.
- B.  This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: \_\_\_\_\_  
mm/dd/yyyy
- C.  This document takes effect upon the occurrence of the future event or fact, other than the passage of time. The 90<sup>th</sup> day after the date of signing is: \_\_\_\_\_  
mm/dd/yyyy

The following event or fact will cause the document to take effect in the manner described below:

[Empty rectangular box for event or fact]

**Tax Certificate**

(Required)

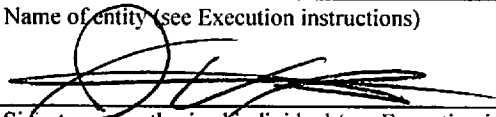
- Attached hereto is a certificate from the comptroller of public accounts that all taxes under title 2, Tax Code, have been paid.

**Execution**

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: 2-10-21

By: The Van Dyke Organization LLC f/k/a JLVD Holdings LLC  
Name of entity (see Execution instructions)

  
Signature of authorized individual (see Execution instructions)

Jason Lee Van Dyke  
Printed or typed name of authorized individual



## TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

Comptroller.Texas.Gov

February 10, 2021

PROUD BOYS OF TEXAS, L.L.C.  
PO BOX 2618  
DECATUR TX 76234-6165

### Certificate of Account Status

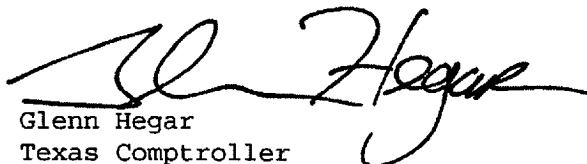
THE STATE OF TEXAS  
COUNTY OF TRAVIS

I, Glenn Hegar, Comptroller of Public Accounts of the State of Texas, DO HEREBY CERTIFY that according to the records of this office

PROUD BOYS OF TEXAS, L.L.C.

has filed all required reports for taxes administered by the Comptroller under Title 2, Tax Code, and taxes reported due on those reports have been paid. This certificate must be filed with the Texas Secretary of State to legally end the entity's existence in Texas. This certificate is valid through December 31, 2021.

GIVEN UNDER MY HAND AND SEAL  
OF OFFICE in the City of  
Austin, this 10th day of  
February, 2021 A.D.

  
Glenn Hegar  
Texas Comptroller

Taxpayer number: 32065503933  
File number: 0802869051

NOTE: Failure by registered Texas entities to legally end existence with the Texas Secretary of State on or before the expiration of this certificate will result in additional franchise tax responsibilities. Texas entities not registered with the Texas Secretary of State and all out-of-state entities are responsible for franchise tax through the last date of business in this state.

## Filing Receipt for Surrender of Registration for Cancellation Form and Next Steps

**Registration number.** 5462744.

**Mark.** PROUD BOYS(Standard Characters, see [mark](#)).

Thank you for submitting your form to the U.S. Patent and Trademark Office (USPTO). Please read this filing receipt carefully and keep a copy for your records. If you find errors in your submission, the [After You File](#) page gives information about correcting errors.

### Next steps

- 1. In four to five days, please confirm that we received the documents submitted with this form** by checking [Trademark Status and Document Retrieval \(TSDR\)](#). If your documents do not appear in TSDR after four to five days, please email [TrademarkAssistanceCenter@uspto.gov](mailto:TrademarkAssistanceCenter@uspto.gov).
- 2. Within approximately one to two months, a trademark specialist in the Post-Registration Division will review your submission.**

**If your submission is accepted,** you will receive a Notice of Surrender.

**If your submission is not accepted,** you will receive a letter (Office action) explaining why it is not acceptable and how to proceed. Visit our page on [keeping your registration alive](#) for a video and other information on the post-registration process.

- 3. Continue to check [TSDR](#) for any updates to your status until we send you a notice that your submission has been accepted or refused.** If you do not hear from us within three or four months of submitting this form, call the Post-Registration Division at (571) 272-9500.
- 4. Keep your addresses, including email addresses, current in USPTO records so you receive email reminders about maintaining your registration.** You must file required maintenance documents at regular intervals or your registration will be canceled. We will send these [reminders](#) to all email addresses of record listed in TSDR. Use the [address forms](#) on our website to update your email addresses.
- 5. Questions?** Please visit [our website](#), [email us](#), or call us at 1-800-786-9199 and select option 1.

**The information submitted in the form appears below:**

Global Form: No Form Number

Approved for use through 10/01/2021. OMB 0924-0050

U.S. Patent and Trademark Office, U.S. DEPARTMENT OF COMMERCE

Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it carries a valid OMB control number.

## Surrender of Registration for Cancellation

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The table below presents the data as entered.

Input Field	Entered
<b>SERIAL NUMBER</b>	87561573
<b>REGISTRATION NUMBER</b>	5462744
<b>MARK SECTION</b>	
<b>MARK</b>	<a href="https://tmng-al.uspto.gov/resting2/api/img/87561573/large">https://tmng-al.uspto.gov/resting2/api/img/87561573/large</a>
<b>LITERAL ELEMENT</b>	PROUD BOYS
<b>STANDARD CHARACTERS</b>	YES
<b>USPTO-GENERATED IMAGE</b>	YES
<b>MARK STATEMENT</b>	The mark consists of standard characters, without claim to any particular font style, size or color.
<b>FORM TEXT</b>	
Pursuant to 15 U.S.C. 1057(e), The Van Dyke Organization L.L.C. f/k/a JLVD Holdings LLC surrenders registration of the following trademark in its entirety:	
<p>Mark: Proud Boys            Serial Number: 87561573            Filing Date: August 9, 2017            Registration Number: 5462744            Type of Mark: Service Mark            Good/Service: Association services, namely, organizing chapters of a fraternity and promoting the interests of the members thereof.            This request is submitted for the following reason: The use of this trademark by its owner was discontinued on November 28, 2018 and there is no intent to ever resume such use.            The Van Dyke Organization LLC hereby requests cancellation of the trademark in its entirety. All classes of the trademark are hereby surrendered.            EXECUTED this 10th day of February, 2021.            Jason Lee Van Dyke            CEO and General Counsel            PO Box 2618            Decatur, TX 76234            P - (940) 305-9242            F - (940) 294-1422            E - jason@vandykelegalgroup.com</p>	
<b>FORM FILE NAME(S)</b>	Surrender_of_Trademark_00 1_2021110113017587.pdf
<b>OWNER SECTION (Current)</b>	
<b>NAME</b>	THE VAN DYKE ORGANIZATION LLC

<b>MAILING ADDRESS</b>	117 HILLCREST LANE
<b>CITY</b>	DECATUR
<b>STATE</b>	Texas
<b>COUNTRY/REGION/JURISDICTION/U.S. TERRITORY</b>	United States
<b>ZIP/POSTAL CODE</b>	76234
<b>EMAIL</b>	Not Provided
<b>OWNER SECTION (Proposed)</b>	
<b>NAME</b>	THE VAN DYKE ORGANIZATION LLC
<b>MAILING ADDRESS</b>	PO BOX 2618
<b>CITY</b>	DECATUR
<b>STATE</b>	Texas
<b>COUNTRY/REGION/JURISDICTION/U.S. TERRITORY</b>	United States
<b>ZIP/POSTAL CODE</b>	76234
<b>DOMICILE</b>	117 Hillcrest LaneDecatur, TX 76234
<b>PHONE</b>	940-305-9242
<b>FAX</b>	940-294-1422
<b>EMAIL</b>	jasonleevandyke@protonmail.com
<b>ATTORNEY INFORMATION (current)</b>	
<b>NAME</b>	Jason L. Van Dyke
<b>ATTORNEY BAR MEMBERSHIP NUMBER</b>	NOT SPECIFIED
<b>YEAR OF ADMISSION</b>	NOT SPECIFIED
<b>U.S. STATE/ COMMONWEALTH/ TERRITORY</b>	NOT SPECIFIED
<b>FIRM NAME</b>	THE VAN DYKE LAW FIRM P.L.L.C.
<b>STREET</b>	108 DURANGO DRIVE
<b>CITY</b>	CROSSROADS
<b>STATE</b>	Texas
<b>POSTAL CODE</b>	76227
<b>COUNTRY/REGION/JURISDICTION/U.S.</b>	United States



<b>TERRITORY</b>	
<b>PHONE</b>	469-964-5346
<b>FAX</b>	972-421-1830
<b>EMAIL</b>	jason@vandykelawfirm.com
<b>ATTORNEY INFORMATION (proposed)</b>	
<b>NAME</b>	Jason L. Van Dyke
<b>ATTORNEY BAR MEMBERSHIP NUMBER</b>	24057426
<b>YEAR OF ADMISSION</b>	2007
<b>U.S. STATE/ COMMONWEALTH/ TERRITORY</b>	Texas
<b>FIRM NAME</b>	THE VAN DYKE LEGAL GROUP LLC
<b>STREET</b>	117 Hillcrest Lane
<b>CITY</b>	DECATUR
<b>STATE</b>	Texas
<b>POSTAL CODE</b>	76234
<b>COUNTRY/REGION/JURISDICTION/U.S. TERRITORY</b>	United States
<b>PHONE</b>	940-305-9242
<b>FAX</b>	940-294-1422
<b>EMAIL</b>	jason@vandykelegalgroup.com
<b>CORRESPONDENCE INFORMATION (current)</b>	
<b>NAME</b>	JASON L. VAN DYKE
<b>PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE</b>	jason@vandykelawfirm.com
<b>SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)</b>	NOT PROVIDED
<b>CORRESPONDENCE INFORMATION (proposed)</b>	
<b>NAME</b>	Jason L. Van Dyke
<b>PRIMARY EMAIL ADDRESS FOR CORRESPONDENCE</b>	jason@vandykelegalgroup.com
<b>SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES)</b>	jasonleevandyke@gmail.com

<b>SIGNATURE SECTION</b>	
<b>SUBMISSION SIGNATURE</b>	/Jason Lee Van Dyke/
<b>SIGNATORY'S NAME</b>	Jason Lee Van Dyke
<b>SIGNATORY'S POSITION</b>	General Counsel
<b>SIGNATORY'S PHONE NUMBER</b>	940-305-9242
<b>DATE SIGNED</b>	02/10/2021
<b>ROLE OF AUTHORIZED SIGNATORY</b>	Authorized U.S.-Licensed Attorney
<b>SIGNATURE METHOD</b>	Signed directly within the form
<b>FILING INFORMATION SECTION</b>	
<b>SUBMIT DATE</b>	Wed Feb 10 23:35:58 ET 2021
<b>TEAS STAMP</b>	USPTO/S7S-45.131.192.53-2 0210210233558275953-54627 44-20210210232434553636-N /A-N/A-202102102324345536 36

Global Format, No Form Number

Approved for use through 10/31/2021, OMB 0501-0030

U.S. Patent and Trademark Office, U.S. DEPARTMENT OF COMMERCE

Under the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number.

## Surrender of Registration for Cancellation To the Commissioner for Trademarks:

The following is submitted for registration number: **5462744** (PROUD BOYS)

### FORM TEXT:

Pursuant to 15 U.S.C. 1057(e), The Van Dyke Organization L.L.C. f/k/a JLVD Holdings LLC surrenders registration of the following trademark in its entirety:

Mark: Proud Boys  
 Serial Number: 87561573  
 Filing Date: August 9, 2017  
 Registration Number: 5462744  
 Type of Mark: Service Mark

Good/Service: Association services, namely, organizing chapters of a fraternity and promoting the interests of the members thereof.

This request is submitted for the following reason: The use of this trademark by its owner was discontinued on November 28, 2018 and there is no intent to ever resume such use.

The Van Dyke Organization LLC hereby requests cancellation of the trademark in its entirety. All classes of the trademark are hereby surrendered.

EXECUTED this 10th day of February, 2021.

Jason Lee Van Dyke

CEO and General Counsel

PO Box 2618

Decatur, TX 76234

P - (940) 305-9242

F - (940) 294-1422

E - jason@vandykelegalgroup.com

**FORM FILE NAME(S):**

Surrender\_of\_Trademark\_001\_2021110113017587.pdf

**The owner proposes to amend the following:**

**Current:** THE VAN DYKE ORGANIZATION LLC, having an address of

117 HILLCREST LANE

DECATUR, Texas 76234

United States

**Proposed:** THE VAN DYKE ORGANIZATION LLC, having an address of

PO BOX 2618

DECATUR, Texas 76234

United States

Phone: 940-305-9242

Fax: 940-294-1422

Email Address: jasonleevandyke@protonmail.com

**Domiciled at:** 117 Hillcrest Lane Decatur, TX 76234

The owner's/holder's current attorney information: Jason L. Van Dyke. Jason L. Van Dyke of THE VAN DYKE LAW FIRM P.L.L.C., is located at

108 DURANGO DRIVE

CROSSROADS, Texas 76227

United States

The phone number is 469-964-5346.

The fax number is 972-421-1830.

The email address is jason@vandykelawfirm.com

The owner's/holder's proposed attorney information: Jason L. Van Dyke. Jason L. Van Dyke of THE VAN DYKE LEGAL GROUP LLC, is a member of the Texas bar, admitted to the bar in 2007, bar membership no. 24057426, is located at

117 Hillcrest Lane  
DECATUR, Texas 76234  
United States

The phone number is 940-305-9242.

The fax number is 940-294-1422.

The email address is [jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com)

Jason L. Van Dyke submitted the following statement: The attorney of record is an active member in good standing of the bar of the highest court of a U.S. state, the District of Columbia, or any U.S. Commonwealth or territory.

**Correspondence Information (current):**

JASON L. VAN DYKE  
PRIMARY EMAIL FOR CORRESPONDENCE: [jason@vandykelawfirm.com](mailto:jason@vandykelawfirm.com)  
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): NOT PROVIDED

**Correspondence Information (proposed):**

Jason L. Van Dyke  
PRIMARY EMAIL FOR CORRESPONDENCE: [jason@vandykelegalgroup.com](mailto:jason@vandykelegalgroup.com)  
SECONDARY EMAIL ADDRESS(ES) (COURTESY COPIES): [jasonleevandyke@gmail.com](mailto:jasonleevandyke@gmail.com)

**Requirement for Email and Electronic Filing:** I understand that a valid email address must be maintained by the applicant owner/holder and the applicant owner's/holder's attorney, if appointed, and that all official trademark correspondence must be submitted via the Trademark Electronic Application System (TEAS).

**Submission Signature**

Signature: /Jason Lee Van Dyke/ Date: 02/10/2021  
Signatory's Name: Jason Lee Van Dyke  
Signatory's Position: General Counsel  
Signatory's Phone Number: 940-305-9242  
Signature method: Signed directly within the form

The signatory has confirmed that he/she is a U.S.-licensed attorney who is an active member in good standing of the bar of the highest court of a U.S. state (including the District of Columbia and any U.S. Commonwealth or territory); and he/she is currently the owner's/holder's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S.-licensed attorney not

currently associated with his/her company/firm previously represented the owner/holder in this matter: the owner/holder has revoked their power of attorney by a signed revocation or substitute power of attorney with the USPTO; the USPTO has granted that attorney's withdrawal request; the owner/holder has filed a power of attorney appointing him/her in this matter; or the owner's/holder's appointed U.S.-licensed attorney has filed a power of attorney appointing him/her as an associate attorney in this matter.

Thank you,

The TEAS support team

Wed Feb 10 23:35:58 ET 2021

STAMP: USPTO/S7S-45.131.192.53-20210210233558275953-5462744-20210210232434553636-N/A-N/A-20210210232434553636

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**METROPOLITAN AFRICAN METHODIST  
EPISCOPAL CHURCH,**

**Plaintiff,**

**v.**

**PROUD BOYS INTERNATIONAL, L.L.C.,  
ENRIQUE TARRIO, JOHN DOES #1-8,**

**Defendants.**

**No. 2021 CA 000004 B  
Judge Heidi M. Pasichow  
Next Court Date: Apr. 9,  
2021, 9:30 AM  
Event: Initial Conference**

**ORDER**

Upon consideration of the Motion for Entry of Default in the above-captioned matter, and good cause having been shown, it is this \_\_\_ day of February, 2021 by the Superior Court of the District of Columbia,

ORDERED, that the Motion is GRANTED and default is entered against Defendant Enrique Tarrío for failure to timely answer Plaintiff's Complaint; and it is further

ORDERED, that this entry of default shall take effect 14 days from the date of this Order, pursuant to D.C. Rule of Civil Procedure 55(a)(2).

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JUDGE HEIDI M. PASICHOW  
SUPERIOR COURT OF THE DISTRICT  
OF COLUMBIA