

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2018 JUN -8 PM 4:05

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEPUTY CLERK 

Cause No.: 3:18-cv-00833-D-BN

STEVE S. GEE JR.,)	In a removal from the 422nd District
)	Court of Kaufman County, Texas
Petitioner,)	
)	State case number: 96435-422
v.)	("In the Interest of J.E.G., a Child")
)	Judge Michael B. Chitty, presiding
STATE OF TEXAS,)	
STACEY D. GEE, and)	
ADORA L. LOCKABY,)	CONSTITUTIONAL QUESTIONS
)	INJUNCTIVE RELIEF SOUGHT
Respondents.)	DEMAND FOR JURY TRIAL

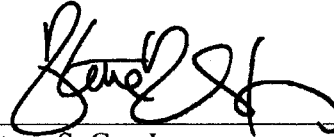
**Petitioner's Formal Request for Clerk's Rule 55(a)
Entry of Default upon Respondent Adora L. Lockaby**

Comes now Petitioner, Steve S. Gee Jr., who with the corresponding and attached Affidavit, and pursuant to mandate of **F.R.Cv.P. Rule 55(a)**, hereby does request the Clerk now and therefore enter Default upon Respondent Adora L. Lockaby on the basis that the record in this case clearly confirms that Respondent Adora L. Lockaby has failed to file her own any appearance herein or cause any attorney to file any appearance herein, let alone file valid answer or motion to remand, or otherwise plead or defend in any manner whatsoever.

CLERK: PLEASE NOTE THAT THIS DUTY IS MANDATORY UPON THE CLERK, AS FOR REQUIRED ENTRY OF RULE 55(A) "DEFAULT" BY THE CLERK (as a party's procedural *Default*, not as entering any *Default Judgment* for any sum certain under Rule 55(B)), which Rule 55(A) clearly commands: "When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend,

and that failure is shown by affidavit or otherwise, **the clerk must**
enter the party's default." (emphasis added)

Respectfully submitted,



Steve S. Gee Jr.
6771 W. 138th Terrace #1131
Overland Park, KS 66223
Tel: (469) 651-3610
Email: gee.steve@live.com
Pro Se Petitioner Party of Record

CERTIFICATE OF SERVICE

I hereby certify: that on this 8th day of June, 2018, a true and complete copy of the
above formal request for clerk's Rule 55 entry of default, by depositing the same via first class
postage prepaid mail, USPS or equivalent postal carrier, has been duly served upon each of:

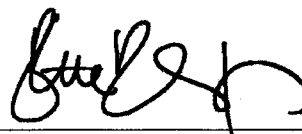
(United States Attorney General)
Attorney General Jeff Sessions
c/o U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

(Respondent State of Texas)
State of Texas
c/o Attorney General Kenneth Paxton
P.O. Box 12548
Austin, TX 78711-2548

(Respondent Stacey)
Stacey D. Gee
1003 Nueces Court
Forney, TX 75126

(state counsel of Respondent Stacey)
Brandi H. Fernandez, SBN #00797576
Cheney, Fernandez & Associates, P.C.
1023 W. U.S. Highway 175 Ste B
Crandall, TX 75114

(Respondent Adora)
Adora L. Lockaby
c/o Baylor, Scott & White Family Medical Center
1975 Alpha Drive, Suite 204
Rockwall, TX 75087



Steve S. Gee Jr.