

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

, Plaintiff

VS.

Cause No.

, Defendant

MOTION FOR ENTRY OF DEFAULT JUDGMENT

COMES NOW, Plaintiff, , by and through counsel, pursuant to Rule 55(b) of the Mississippi Rules of Civil Procedure, and moves the Court for entry of a default judgment for Plaintiff against the Defendants herein, and in support thereof states the following:

1.

Plaintiff filed suit against Defendants on , .

2.

Defendant, , was duly served with a copy of the Summons, together with a copy of Plaintiff's Complaint, on the day of , .

3.

More than thirty (30) days elapsed from the date on which each of the Defendants was served with the Summons and a copy of the Complaint and all of the Defendants have failed to plead, answer or otherwise defend as to Plaintiff's Complaint or to serve a copy of any answer or other defense which they might have upon any attorney of record for the Plaintiff.

4.

Plaintiff hereafter filed its Application to Clerk for Entry of Default and its supporting Affidavit on , . An Entry of Default was docketed by the Chancery Clerk of County, Mississippi on or about , . Copies of the Application for Entry of Default,

the supporting Affidavit, and the Docket of Entry of Default are attached hereto and incorporated herein by reference.

5.

None of the Defendants are an infant or an unrepresentative incompetent person and the each of the Defendants have failed to plead, answer or otherwise defend this action. Since the time that Plaintiff has obtained an entry of default against said Defendants, the Defendants have still failed to plead, answer, defend or take any other proceedings in this action.

6.

The Defendants remain in default and the Plaintiff is entitled to entry of a default judgment in its favor and against Defendants for the relief requested in its Complaint.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, _____, respectfully moves the Court to enter a judgment confirming Plaintiff's tax title in the following described land located in _____ County, Mississippi, which was sold for taxes on _____, _____, to-wit: " _____, located in _____ County, Mississippi" as against Defendants and all persons claiming to hold the land by title existing at the time of the sale for taxes and vesting in Plaintiff a good and sufficient title in said land, said judgment to be held as conclusive evidence that title to said land is vested in Plaintiff, as against all persons claiming same under the title existing prior to said sale for taxes.

THIS, the _____ day of _____, _____.

Respectfully submitted,

Attorney for

Of counsel:

Telephone:
MSB #
Attorney for