

UNITED STATES DISTRICT COURT

DISTRICT OF CONNECTICUT

DENIS MARC AUDET, MICHAEL  
PFEIFFER, DEAN ALLEN SHINNERS, and  
JASON VARGAS, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiffs,

vs.

STUART A. FRASER, GAW MINERS, LLC,  
and ZENMINER, LLC, (d/b/a ZEN CLOUD),

Defendants.

Case 3:16-cv-00940

Hon. Michael P. Shea  
Courtroom 2

ECF Case

CLASS ACTION

MARCH 1, 2017

PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION AND DEFAULT  
JUDGMENT

Pursuant to Federal Rule of Civil Procedure ("FRCP") 23 and FRCP 55(b)(2) and for the reasons provided in the attached memorandum, Plaintiffs file this motion requesting that the Court (1) certify a default judgment class for the purposes of obtaining a default judgment against Defendants GAW Miners, LLC and ZenMiner, LLC ("Default Defendants"); (2) enter a default judgment against Default Defendants; and (3) appoint Susman Godfrey LLP as class counsel.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2017, a copy of foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Mark P. Kindall