

NO.: NNH-CV-14-6050848-S

ZHAOYIN WANG, Plaintiff,	:	SUPERIOR COURT
	:	
v.	:	J.D. OF NEW HAVEN
	:	AT NEW HAVEN
BETA PHARMA, INC. AND DON ZHANG, Defendants/Third Party Plaintiffs,	:	
	:	
ZHEJIANG BETA PHARMA CO., LTD., Defendant,	:	
	:	
v.	:	
	:	
NANJING ALLGEN PHARMA CO., LTD., Third Party Defendant.	:	NOVEMBER 10, 2016

MOTION FOR DEFAULT FOR FAILURE TO APPEAR

Pursuant to Practice Book § 17-20, defendants/third party plaintiffs Beta Pharma, Inc. and Don Zhang (“Defendants”) hereby move that third party defendant Nanjing Allgen Pharma Co., Ltd. (“Nanjing”) be defaulted for failure to appear on all counts in Defendants’ Third Party Complaint, dated August 12, 2016.

On August 2, 2016, the Court granted Defendants, as third party plaintiffs, permission to serve a Third Party Summons and Complaint on Nanjing pursuant to Conn. Gen. Stat. § 52-102a [D.E. #203.10]. Defendants served that Summons and Complaint on Nanjing, and on October 4, 2016, they returned it to the Court with proof of service. See Third Party Summons and Complaint against Nanjing Allgen Pharma with Return of Service [D.E. # 207.00].

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CERTIFICATE OF SERVICE

Pursuant to Practice Book § § 10-12 and 10-13, I hereby certify that a copy of the foregoing was served upon the defaulting party by registered mail, return receipt requested, at its last known address, on this 10th day of November, 2016, as follows:

Nanjing Allgen Pharma Co., Ltd.
c/o the Secretary
8 Yongfeng Street, Suite B-503
Baixia High Tech District
Nanjing 210014
PEOPLE'S REPUBLIC OF CHINA

And I further certify that a copy of the foregoing was served upon the following counsel of record by email this 10th day of November, 2016:

Jonathan Katz, Esq.
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/s/

Michael G. Caldwell (juris no. 421880)