

GRANTED

01/20/2023

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

*VBW*

DEAFUEH MONBO, *et al*

\* Civil Action No: C-03-CV-22-003607

*Plaintiffs*

\*

v.

ELIZABETH C. LEAMING, *et al*

\*

*Defendants*

\*

\* \* \* \* \*

**REQUEST FOR ORDER OF DEFAULT AGAINST DEFENDANTS IN THEIR OFFICIAL CAPACITY**

Plaintiffs Deafueh Monbo and Juahdi Monbo (“Plaintiffs”) request the entry of an Order of Default against Defendants Elizabeth Leaming and Mark Stabile in their official capacities and state as follows:

1. Connecticut General Statute § 52-64(a) authorizes the Attorney General to accept service of process on the defendants when they are sued in their official capacity.
2. The Attorney General is authorized by law to accept service of process when the Defendants are sued in their official capacity. Personal service is not required when the Defendants are sued in their “official capacity”. Md. R. Civ. P. Cir. Ct. 2-124.
3. This action was initiated by Plaintiffs by the filing of a Complaint in the Circuit Court for Baltimore County, Maryland, on September 12, 2022.
4. The action was brought against Defendants Elizabeth Leaming and Mark Stabile in their official capacity.

Entered: Clerk, Circuit Court for  
Baltimore County, MD  
January 20, 2023

5. Plaintiffs have properly served the defendants in their official capacities by serving a copy of the Complaint and Summons with the attorney general at the Office of the Attorney General.

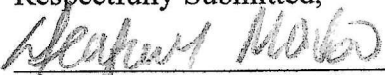
6. Service of the Complaint was obtained on Defendants Elizabeth Leaming and Mark Stabile in their official capacity on November 2, 2022, as set forth in the Affidavits of Service filed in these proceedings. (See Exhibit 1 and 2 attached hereto)

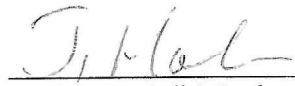
7. The time of pleading or otherwise responding to the Complaint has expired and the Defendants have failed to plead as provided by the Maryland Rules of Procedure.

8. The Plaintiffs request that this Court enter an Order of Default based upon the failure of Defendants, Elizabeth Leaming and Mark Stabile, to respond or otherwise plead to the Complaint filed in these proceedings.

9. The known address of the Attorney General authorized by law to accept service of process for Defendants Elizabeth Leaming and Mark Stabile in their official capacity is Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106.

**WHEREFORE**, the Plaintiffs pray that an Order of Default be issued and that notice of the Order of Default be provided to the Defendants in their official capacity by the Clerk of this Court.

Respectfully Submitted,  
  
Deafueh Monbo, Plaintiff  
3608 Offutt Rd, Unit 234  
Randallstown, MD 21133  
Email: MonboDocs@gmail.com  
Phone: (410) 207-0242

  
Juahdi Monbo, Plaintiff  
3608 Offutt Rd, Unit 234  
Randallstown, MD 21133  
Email: MonboDocs@gmail.com  
Phone: (410) 207-0242

## CERTIFICATE OF SERVICE

I hereby certify that a copy of this REQUEST FOR ORDER OF DEFAULT AGAINST DEFENDANTS IN THEIR OFFICIAL CAPACITY was mailed on January 20, 2023, to the defendant(s) at the below address:

ELIZABETH C. LEAMING  
Serve on: Attorney General William Tong  
Office of the Attorney General  
165 Capitol Avenue  
Hartford, CT 06106

MARK STABILE  
Serve on: Attorney General William Tong  
Office of the Attorney General  
165 Capitol Avenue  
Hartford, CT 06106

ELAINE EVANS  
6 Marissa Circle  
Worcester, MA 01604

  
Deafueh Monbo, Plaintiff  
3608 Offutt Rd, Unit 234  
Randallstown, MD 21133  
Email: MonboDocs@gmail.com  
Phone: (410) 207-0242

  
Juahti Monbo, Plaintiff  
3608 Offutt Rd, Unit 234  
Randallstown, MD 21133  
Email: MonboDocs@gmail.com  
Phone: (410) 207-0242