

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

The Michelin Retirement Plan and the
Investment Committee of the Michelin
Retirement Plan,

Plaintiffs,

v.

Dilworth Paxson, LLP, BFG Socially
Responsible Investments, Ltd., Burnham
Financial Group, Inc., Burnham Securities,
Inc., COR Fund Advisors, LLC, GMT Duncan,
LLC, Greenberg Traurig, LLP, Thorsdale
Fiduciary and Guaranty Company Ltd., U.S.
Bank National Association, Valor Group Ltd.,
Wakpamni Lake Community Corp., Wealth-
Assurance AG, Wealth Assurance Private
Client Corporation, Timothy B. Anderson, Jon
Michael Burnham, Devon D. Archer, Bevan T.
Cooney, Hugh Dunkerley, Jason W. Galanis,
John P. Galanis, Gary T. Hirst, Frankie D.
Hughes, and Michelle A. Morton,

Defendants.

Case No. 6:16-CV-03604-HMH-JDA

**PLAINTIFFS' REQUEST FOR ENTRY OF DEFAULT AS TO DEFENDANT
WAKPAMNI LAKE COMMUNITY CORP.**

PLEASE TAKE NOTICE that the undersigned, as attorneys for the Plaintiffs, requests that the Clerk of Court enter Defendant Wakpamni Lake Community Corp. in default pursuant to Rule 55(a), Federal Rules of Civil Procedure, on the grounds that the Defendant Wakpamni Lake Community Corp. has failed to plead or otherwise defend the above action as required, and within the time period allowed, by the Federal Rules of Civil Procedure; and, as a result, Defendant Wakpamni Lake Community Corp. is in default.

This request is further based on the pleadings, the applicable law, and the Affidavit of J. Derrick Quattlebaum attached hereto.

s/ J. Derrick Quattlebaum

J. Derrick Quattlebaum, Fed ID No. 5252

Steve A. Matthews, Fed ID No. 5119

J. W. Matthews III, Fed ID No. 3202

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The Investment Committee of the Michelin

Retirement Plan and the Michelin Retirement Plan

March 22, 2017