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*pro se*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII**

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|                          |   |                             |
|--------------------------|---|-----------------------------|
| LUIS SANCHO, et al.,     | ) | Civil No. CV08-00136 HG     |
|                          | ) |                             |
| Plaintiffs,              | ) | <b>MOTION FOR PERMANENT</b> |
|                          | ) | <b>INJUNCTION AGAINST</b>   |
| vs.                      | ) | <b>DEFAULTING DEFENDANT</b> |
|                          | ) | <b>CERN</b>                 |
| US DEPARTMENT OF ENERGY, | ) |                             |
| et al.,                  | ) |                             |
|                          | ) |                             |
| Defendants.              | ) | Hon. Helen Gillmor          |
| _____                    | ) |                             |

**MOTION FOR PERMANENT INJUNCTION AGAINST  
DEFAULTING DEFENDANT CERN**

Plaintiffs Luis Sancho and Walter L. Wagner respectfully move this Court for entry of a Judgment Order based upon the clerical default of defendant CERN, and request that the Permanent Injunction sought in the Complaint be entered as against defendant CERN.

This motion is based upon the entry of a clerical default against defendant CERN herein, the unanswered allegations of the complaint, the sworn affidavits filed herein in support of the complaint, the accompanying *Memorandum of Law in Support of Permanent Injunction*, the accompanying sworn affidavits filed in support of entry of a Permanent Injunction, and such other and further argument and evidence as may be presented at a Proof Hearing should such be required by this Court.

Dated: July 24, 2008

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Walter L. Wagner

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Luis Sancho