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Attorneys For Plaintiff, Eugene I. Davis, Litigation Trustee for the Quebecor World Litigation Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Quebecor World (USA), Inc., et al.,

Debtors.

Eugene I. Davis, Litigation Trustee for
the Quebecor World Litigation Trust,
Plaintiff,

vs.

Barlow Transportation Services, Inc.,
Defendant.

Bk. No. 08-10152-JMP

Chapter 11

Adv. No. 10-01010 -SHL

MOTION FOR DEFAULT JUDGMENT

The above-captioned Plaintiff, Eugene I. Davis, Litigation Trustee for the Quebecor World Litigation Trust (the "Plaintiff"), by and through its counsel, hereby represents as follows:

1. On or about January 11, 2010 the Plaintiff timely filed a Complaint to Avoid and Recover Transfers of Property [11 U.S.C. §§ 547-550] ("Complaint") with this Court, initiating the above-captioned adversary proceeding.

2. Plaintiff's attorneys, A/S/K Financial, LLP served a copy of the Summons and Complaint upon Defendant, Barlow Transportation Services, Inc., by regular first-class United States mail, postage fully prepaid, on January 29, 2010.

3. The Defendant has failed to answer or otherwise defend the Complaint.

4. An extension of time to answer the Complaint has not been sought by the Defendant nor granted by the Court.

5. To the best of Plaintiff's knowledge, Defendant is not in the armed forces, nor is he a minor or incompetent.

6. The Clerk of the Bankruptcy Court filed an Entry of Default on or about November 10, 2010.

7. Plaintiff's Application for Default Judgment annexes all relevant pleadings and sets forth grounds for default judgment.

WHEREFORE, pursuant to Federal Rule of Bankruptcy Procedure 7055, Federal Rule of Civil Procedure 55(b), Plaintiff moves this Court for a default judgment against the Defendant in the sum of \$50,350.00, plus interest and costs in the sum of \$250.00 for a total judgment in the sum of \$50,757.40 as of today's date with interest continuing to accrue at a daily rate of \$0.48

Dated: December 3, 2010

A/S/K FINANCIAL LLP

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