

NEW JERSEY  
LAWYERS' FUND  
FOR CLIENT PROTECTION

(Civil Action –  
Request for Entry of Default Judgment  
with Supporting Affidavit  
Superior Court of NJ  
Law Division, Mercer County  
Docket No. L-005664-94  
by Daniel R. Hendi, Senior Counsel,  
March 16, 1995)

This page is for information  
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created by Kenneth F. Irek for  
clarification and indexing.

DRH:kmt/CPF-520  
 New Jersey Lawyers' Fund for  
 Client Protection  
 Richard J. Hughes Justice Complex,  
 CN-961,  
 Trenton, New Jersey 08625-0961  
 (609) 984-7179  
 Daniel R. Hendi, Deputy Counsel

REQUEST TO ENTER DEFAULT  
 DEFAULT HAS BEEN ENTERED  
 AS TO THE UNFILED REQUEST  
 AND AFFIDAVIT OF DEFAULT  
 OF THE PLAINTIFF.

DONALD F. PHELAN  
 CLERK OF SUPERIOR COURT  
 SUPERIOR COURT OF N.J.  
 MERCER COUNTY  
 RECEIVED & FILED

MAR 7 6 1995

J. REED  
 CLERK  
 SUPERIOR COURT OF N.J.


*Robert Reed*  
 DEPUTY CLERK  
 SUPERIOR COURT

NEW JERSEY LAWYERS' FUND FOR	:	SUPERIOR COURT OF NEW JERSEY
CLIENT PROTECTION,	:	LAW DIVISION
	:	MERCER COUNTY
Plaintiff,	:	
	:	DOCKET NO. MER L 005664-94
v.	:	
	:	Civil Action
KENNETH IREK,	:	
	:	REQUEST FOR ENTRY OF
Defendant	:	DEFAULT JUDGMENT WITH
	:	SUPPORTING AFFIDAVIT

To: CLERK OF THE SUPERIOR COURT

Will you please enter the default judgment of the defendant,  
 Kenneth Irek, herein for failure to plead or otherwise defend as  
 provided by the Rules of Civil Practice of the Superior Court.

New Jersey Lawyers' Fund for  
 Client Protection

By:   
 DANIEL R. HENDI, Esquire  
 Senior Counsel

Dated : March 1, 1995.



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Trenton, New Jersey 08625-0961  
(609) 984-7179  
Daniel R. Hendi, Deputy Counsel

NEW JERSEY LAWYERS' FUND FOR :  
CLIENT PROTECTION, :  
 :  
Plaintiff, :  
 :  
 :  
v. :  
 :  
KENNETH IREK, :  
 :  
Defendant. :

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MERCER COUNTY  
  
DOCKET NO. MER L 005664-94  
  
Civil Action  
  
AFFIDAVIT IN SUPPORT OF  
REQUEST TO ENTER DEFAULT  
JUDGMENT

DANIEL R. HENDI, of full age, being duly sworn upon his oath according to law, deposes and says :

(1) I am Deputy Counsel to the New Jersey Lawyers' Fund for Client Protection and have been entrusted with the handling of the within matter on behalf of plaintiff.

(2) Defendant, Kenneth Irek, maintained offices for the practice of law in Colts Neck, New Jersey until his disbarment on May 11, 1993.

(3) The Complaint in this matter was filed in the Superior Court, Law Division, Mercer County, on December 29, 1994. On January 3, 1995, the requisite Summons and Complaint were forwarded




to Mr. Irek at his known address of 111 Crandon Boulevard, Key Biscayne, Florida 33149. On January 24, 1995, this office received the certified mail - return receipt card back with a forwarding address for Mr. Irek of 9800 Topanga Cyn, #D, Chatsworth, CA 91311, (copy attached hereto at Exhibit "A").

(4) The certified mail receipt card attached as Exhibit "A" states that service of the within Summons & Complaint was accepted on behalf of defendant on January 18, 1995.

(5) I have, on today's date, contacted the Clerk's Office and have been advised that the defendant has neither filed an Answer nor any other pleading in this action.

(6) As a result of the failure of Defendant to answer or otherwise move, Plaintiff is entitled to the relief sought in the Complaint.

(7) This Affidavit is filed in support of the entry of default judgment against the defendant.



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DANIEL R. HENDI, Esquire  
Senior Counsel

Sworn and subscribed to  
before me this 1st day  
of March, 1995.



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KATHLEEN M. TOMCHO  
Notary Public of New Jersey  
My commission expires 7-29-98

Kathleen M. Tomcho  
Notary Public of New Jersey  
My Commission Expires July 29, 1998



1 Lawyers Fund 1/4

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Mr. Kenneth G. Trek  
 1111 Garden Blvd  
 7805 70th Ave  
 Key Biscayne Florida  
 33149 CA  
 9311

4a. Article Number  
 2363199777

4b. Service Type  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery  
 12-18-95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)  
 [Signature]

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 NJ LAWYERS' FUND FOR  
 CLIENT PROTECTION

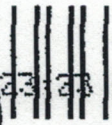
Thank you for using Return Receipt Service.

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PS Form 3811, December 1981 U.S.G.P.O. 1992-307-530 **DOMESTIC RETURN RECEIPT**

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 TRENTON NJ 08650

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*CPK-*

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*Client Protection Fund*  
*CO-961*  
*Trenton, NJ 08625-0961*

Exhibit "A"