

STATE OF NORTH CAROLINA
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24CV034906-910

AEROTEK, INC.,

Plaintiff,

v.

DATRON WORLD
COMMUNICATIONS, INC. and
CYBERLUX CORPORATION,

Defendants.

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MOTION FOR ENTRY OF DEFAULT
AND DEFAULT JUDGMENT

NOW COMES Plaintiff, **AEROTEK, INC.**, (“Plaintiff”), by and through undersigned counsel and, pursuant to Rules 55(a) and (b)(1) of the North Carolina Rules of Civil Procedure, respectfully moves the Court for an Entry of Default and Default Judgment as against Defendants, **DATRON WORLD COMMUNICATIONS, INC. and CYBERLUX CORPORATION**, (“Defendants”).

In support hereof, Plaintiff respectfully shows the Court that Defendants have failed to plead, make an appearance, and is otherwise subject to Entry of Default and Default Judgment as provided by the Rules of Civil Procedure or by statute as shown by the *verified* Complaint filed in this matter. Plaintiff further shows:

1. Plaintiff filed a *verified* Complaint on October 29, 2024.
2. The Defendant Datron World Communications, Inc. was duly served with process of Civil Summons and Complaint in this action in accordance with the provisions of Rule 4 of the North Carolina Rules of Civil Procedure by designated delivery service on October 31, 2024.
3. The Defendant Cyberlux Corporation was duly served with process of Civil Summons and Complaint in this action in accordance with the provisions of Rule 4 of the North

Carolina Rules of Civil Procedure by designated delivery service on October 31, 2024.

4. An Affidavit of Service was filed with the Court on November 7, 2024.

5. This Court has jurisdiction over the Defendants in this matter.

6. Defendants are corporations and not an infant, incompetent person, registered in the military or in the military service, or otherwise under disability.

7. To date, Defendants have failed to plead or appear and is otherwise subject to an Entry of Default and Default Judgment as provided in the Rules of Civil Procedure, Rule 55, and the North Carolina General Statutes, as shown by the *verified* Complaint filed in this action.

WHEREFORE, Plaintiff prays the Court to grant Entry of Default and Default Judgment against Defendant in the principal amount of Two Hundred Four Thousand Seven Hundred Five Dollars and Forty-Five Cents (\$204,705.45) plus reasonable attorney's fees in the amount of Thirty Thousand Seven Hundred Five Dollars and Eighty-Two Cents (\$30,705.82), calculated as fifteen percent (15%) of the outstanding balance pursuant to N.C. Gen. Stat. § 6-21.2, for a total judgment of **Two Hundred Thirty-Five Thousand Four Hundred Eleven Dollars and Twenty-Seven Cents (\$235,411.27)** plus interest at the legal rate of 8% per annum from the date of judgment until paid in full and court costs.

This the 11th day of April 2025.

ANDERSON JONES, PLLC

/s/Todd A. Jones

Todd A. Jones, NCSB # 25593

Attorney for Plaintiff

P.O. Box 20248

Raleigh, NC 27619

Phone: 919-277-2541

Facsimile: 919-277-2544

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT, and (proposed) Entry of Default and Default Judgment** by depositing the foregoing, postage prepaid, in the U.S. Mail addressed to the following:

CYBERLUX CORPORATION
ATTN: CT Corporation System, Registered Agent
160 Mine Lake Ct Ste 200
Raleigh, NC 27615
Defendant

CYBERLUX CORPORATION
ATTN: Officer, Director, or Managing Agent
800 Park Offices Drive, Suite 3209
Research Triangle Park, NC 27709
Defendant

DATRON WORLD COMMUNICATIONS, INC.
ATTN: C T CORPORATION SYSTEM, Registered Agent
330 N Brand Blvd
Glendale, CA 91203
Defendant

DATRON WORLD COMMUNICATIONS, INC.
ATTN: Officer, Director, or Managing Agent
995 Joshua Way, Suite A
Vista, CA 92081
Defendant

This the 11th day of April, 2025.

ANDERSON JONES, PLLC

/s/Todd A. Jones
Todd A. Jones, NCSB # 25593
Attorney for Plaintiff
P.O. Box 20248
Raleigh, NC 27619
Phone: 919-277-2541
Facsimile: 919-277-2544
tjones@andersonandjones.com