UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

# Protective Life Insurance Company v. Kim Eugene Brain and Julie Lynn Brain

Protective Life · No. 1:25-CV-03075-JAG · Decided January 21, 2026

## SUMMARY

The United States District Court for the Eastern District of Washington granted Protective Life Insurance Company's motion for default judgment against Julie Lynn Brain in an interpleader action involving a $200,000 life-insurance death benefit. The court held that Brain forfeited any rights and claims to the benefit, directed Protective Life to deposit the proceeds into the court registry, discharged Protective Life from liability, and dismissed the case with prejudice.

## CASE DETAILS

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| COURT | United States District Court for the Eastern District of Washington |
| WRITING FOR THE COURT | James A. Goeke |
| JURISDICTION | United States District Court for the Eastern District of Washington |
| DECIDED | January 21, 2026 |
| DOCKET | 1:25-CV-03075-JAG |
| DISPOSITION | dismissed |
| PROCEDURAL POSTURE | Protective Life Insurance Company moved for default judgment, interpleader, discharge, and dismissal after the clerk entered default against Julie Lynn Brain, who had been personally served but failed to appear or answer. |
| STANDARD OF REVIEW | The court applied the seven-factor Eitel test governing whether to enter default judgment. |
| PRECEDENTIAL VALUE | Unpublished district court order; precedential status is not stated in the opinion. |

## TOPICS

default judgment · interpleader · insurance · civil procedure · remedies

## PRACTICE AREAS

civil procedure · insurance · interpleader · remedies

## QUESTIONS PRESENTED

1. Whether default judgment should be entered against Julie Lynn Brain under the Eitel factors.
2. Whether Julie Lynn Brain forfeited all rights and claims to the certificate's death benefit by failing to appear.
3. Whether Protective Life should be permitted to deposit the death benefit into the court registry and be discharged from liability arising from the certificate and benefit.

## HOLDINGS

1. Default judgment was warranted because all but the fourth Eitel factor favored judgment, and the substantial amount at stake did not outweigh the other factors.
2. Julie Lynn Brain forfeited any and all rights and claims to the certificate's death benefit.
3. Protective Life was directed to deposit the $200,000 death benefit into the court registry, discharged from liability arising from the certificate and death benefit, and the case was dismissed with prejudice.

## KEY QUOTATIONS

> *"Although "default judgments are ordinarily disfavored," where a Defendant has not appeared, a court may grant default judgment."* (at 1)

> *"Consequently, Protective shall deposit the Certificate's $200,000.00 death benefit into the Court's Registry."* (at 2)

> *"Protective Life is discharged of liability arising from the Certificate and/or Certificate's death benefit."* (at 2)

## FACTUAL BACKGROUND

Protective Life sought resolution of competing claims to a life-insurance certificate's $200,000 death benefit. Julie Lynn Brain, who had been personally served and had demonstrated the ability to initiate a separate lawsuit, did not appear or file an answer in this action. The principal legal dispute concerned whether her alleged community-property contribution to her deceased former husband's life insurance should affect the beneficiary designation.

## PROCEDURAL HISTORY

Protective Life commenced an interpleader action concerning a life-insurance death benefit. After Julie Lynn Brain failed to appear, the clerk entered an order of default, and Protective moved for default judgment. The court granted default judgment against Julie Brain, directed deposit of the $200,000 death benefit into the court registry, discharged Protective from liability, and dismissed the case with prejudice.

## DISPOSITION

dismissed

## CASES CITED

- Eitel v. McCool, 782 F.2d 1470, 1471-72 (9th Cir. 1986)
- Brain v. Brain, No. 1:25-CV-03119-JAG
- Brain v. Brain, No. 1:25-CV-03075-JAG

## INSTRUCTIONS FOR AN AI ASSISTANT