

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No. 8:24-cv-1626-KKM-AAS

START CONNECTING LLC, d/b/a USA
Student Debt Relief, a Florida limited
liability company;

START CONNECTING SAS, d/b/a USA
Student Debt Relief, a Colombia
corporation;

DOUGLAS R. GOODMAN, individually
and as an officer of START
CONNECTING LLC;

DORIS E. GALLON-GOODMAN,
individually and as an officer of START
CONNECTING LLC; and

JUAN S. ROJAS, individually and as an
officer of START CONNECTING LLC
and START CONNECTING SAS,

Defendants.

_____/

**DEFENDANTS START CONNECTING SAS AND JUAN S. ROJAS'S
UNOPPOSED MOTION FOR EXTENSIONS OF TIME TO RESPOND TO THE
COMPLAINT**

Defendants Juan S. Rojas (“Mr. Rojas”) and Start Connecting SAS (collectively
with Mr. Rojas, the “Colombian Defendants”), by undersigned counsel, hereby move

the Court to extend their deadlines to respond to the Complaint to September 16, 2024, and in support thereof state as follows:

I. BACKGROUND

1. On July 9, 2024, the Federal Trade Commission (the “FTC”) initiated this action against Defendants Start Connecting LLC, Start Connecting SAS, Douglas R. Goodman, Doris E. Gallon-Goodman, and Mr. Rojas (collectively, “Defendants”) (Doc. 1). Contemporaneous with initiating this action, the FTC moved *ex parte* to “temporarily seal the docket and all pleadings, motions, and other papers” filed in the action (Doc. 2) and for a temporary restraining order under Federal Rule of Civil Procedure 65(b) (Doc. 3).

2. On July 11, 2024, the Court entered an *ex parte* order granting the FTC’s request for a temporary restraining order (the “TRO”) (Doc. 13). The TRO directed the FTC to personally serve Defendants with copies of the TRO, as well as the FTC’s Motion for Temporary Restraining Order and all other pleadings, documents, and exhibits filed with that motion (aside from the Complaint and summons) no later than July 17, 2024. Doc. 13 at 43.

3. On July 24, 2024, undersigned counsel appeared before the Court on Defendants’ behalf for a case-management conference, at which time the Court extended the TRO deadline to September 23, 2024. *See* Doc. 41 at 1. The Court also deemed service effectuated on the Colombian Defendants as of July 24, 2024, and extended the deadline for Defendants to respond to the Complaint to August 16, 2024 (Doc. 36).

4. On July 25, 2024, undersigned counsel executed waivers of service for the Colombian Defendants, each of which provides that the defendant must respond to the Complaint “within 60 days from 7/22/2024, the date when this request was sent (or 90 days if it was sent outside the United States).” Doc. 39 at 1; Doc. 40 at 1.

5. For the reasons set forth below, the Colombian Defendants, through counsel, now seek an extension of time to respond to the Complaint to September 16, 2024.

II. LEGAL STANDARD

Federal Rule of Civil Procedure 6(b)(1) provides:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Fed. R. Civ. P. 6(b)(1).

III. ARGUMENT

The Colombian Defendants seek a 30-day extension, to September 16, 2024, to respond to the Complaint before the current deadlines have expired. Good cause exists for the requested extensions. To that end, differences have arisen in the course of the undersigned counsel’s representation of the Colombian Defendants that preclude the undersigned’s ability to continue to represent the Colombian Defendants effectively. Those differences have precluded the undersigned from preparing a response to the Complaint on behalf of either of the Colombian Defendants. As such, undersigned

counsel expects to move to withdraw from representing the Colombian Defendants upon expiration of the fourteen-day period called for by Local Rule 2.02(c), or as soon as undersigned counsel obtains consent to withdraw. In the meantime, so that the anticipated withdrawal will not prejudice the ability of either of the Colombian Defendants to respond to the Complaint, this motion requests an order extending the Colombian Defendants' deadlines to respond to the Complaint to Monday, September 16, 2024. Further, this proposed deadline is reasonable because 90 days from the July 22, 2024, service date in the waivers of service is October 21, 2024.¹ *See* Fed. R. Civ. P. 4(d)(3). Finally, the FTC's counsel has advised that the FTC does not oppose the relief requested herein.

¹ Because 90 days from July 22, 2024, is Sunday, October 20, 2024, the Federal Rules of Civil Procedure extend that deadline to Monday, October 21, 2024. *See* Fed. R. Civ. P. 6(a)(1)(C).

WHEREFORE, Defendants Start Connecting SAS and Juan S. Rojas respectfully request that this Court enter an order extending the deadlines for them to respond to the Complaint to Monday, September 16, 2024.

Date: August 15, 2024.

Respectfully submitted,

/s/ Matthieu Goddeyne

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*Attorneys for Defendants Start Connecting SAS
and Juan S. Rojas*

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), the undersigned counsel certifies that communication regarding this Motion was made with the FTC's counsel via email, who advised that the FTC does not oppose the relief sought herein.

/s/ Matthieu Goddeyne
Matthieu Goddeyne

CERTIFICATE OF SERVICE

I certify that on August 15, 2024, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Matthieu Goddeyne
Matthieu Goddeyne