

**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.

**GUNSTER'S MOTION TO WITHDRAW AS COUNSEL FOR
DEFENDANTS JUAN S. ROJAS AND START CONNECTING SAS**

COME NOW, attorneys John Schifino, Matthieu Goddeyne, Gregory Pierson, Melanie Senosiain and the law firm of Gunster, Yoakley & Stewart P.A. (collectively "Gunster") and, pursuant to Local Rule 2.02(c) of the United States District Court for the Middle District of Florida, file this motion to withdraw as counsel for Defendants

Juan S. Rojas and Start Connecting SAS in the instant matter, and in support thereof state:

1. On or about July 9, 2024, the Federal Trade Commission (“FTC”) initiated this action against Defendants Start Connecting LLC, Start Connecting SAS, Douglas R. Goodman, Doris E. Gallon-Goodman, and Juan S. Rojas (Doc. 1) alleging certain violations of federal law.

2. On or about July 24, 2023, Gunster entered a notice of appearance on behalf of all the Defendants, including Defendants Rojas and Start Connecting SAS.

3. Differences have arisen between Gunster, on the one hand, and Defendants Juan S. Rojas and Start Connecting SAS, on the other hand, that preclude Gunster’s ability to continue representing Defendants Juan S. Rojas and Start Connecting SAS in this litigation.

4. On August 11, 2024, Gunster provided Defendants Juan S. Rojas and Start Connecting SAS with notice of Gunster’s intent to file the instant motion and to seek to withdraw as legal counsel for both Defendants (the “Notice”).

5. More than fourteen (14) days have passed since Gunster provided the Notice.

6. Upon information and belief, the contact information for Defendants Juan S. Rojas and Start Connecting SAS are:

Email: jayrojas423@gmail.com

Last Known Address: Calle 16 N # 6N-21 Oficina (401)

Cali, Colombia

Telephone: 57 318 8234462

7. Undersigned counsel certifies that, after filing the instant Motion, Gunster will forward a copy of the instant Motion to Defendants Juan S. Rojas and Start Connecting SAS.

8. In light of the foregoing, Gunster respectfully moves this Court, pursuant to Local Rule 2.02(c), for an order authorizing its withdrawal as counsel for, and relieving it from any continuing obligation to defend, both Defendants Start Connecting SAS and Juan S. Rojas in the instant litigation. *See, Lasswell Found. for Learning & Laughter, Inc. v. Schwartz, 8:17-CV-46-JDW-CPT, 2022 WL 17835004, at *1 (M.D. Fla. Mar. 16, 2022) (granting motion to withdraw as counsel where counsel provided requisite notice and client's contact information).*

WHEREFORE, for the reasons outlined herein, Gunster respectfully moves this Court, pursuant to Local Rule 2.02(c), for an order authorizing its withdrawal as counsel for, and relieving it from any continuing obligation to defend, both Defendants Start Connecting SAS and Juan S. Rojas in the instant litigation.

Date: August 27, 2024.

Respectfully submitted,

/s/ Matthieu Goddeyne

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LOCAL RULE 2.02(c) CERTIFICATION

Pursuant to Local Rule 2.02(c), undersigned counsel certifies that Gunster notified Defendants Juan S. Rojas and Start Connecting SAS of its intent to move to withdraw as counsel via email on August 11, 2024.

/s/ Matthieu Goddeyne

MATTHIEU GODDEYNE

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that Gunster advised counsel for the FTC as well as the Receiver and Receiver's counsel of its intent to move to withdraw as counsel for Defendants Juan S. Rojas and Start Connecting SAS and none objected.

/s/ Matthieu Goddeyne
MATTHIEU GODDEYNE

CERTIFICATE OF SERVICE

I certify that on August 27, 2024, the foregoing was electronically filed with the Clerk of the Court for the Middle District of Florida by uploading an exact copy to the CM/ECF system, which will send a notice of electronic filing to all counsel of record. I further certify that on August 27, 2024, a copy of the filed Motion will be emailed to Defendants Juan S. Rojas and Start Connecting SAS at jayrojas423@gmail.com.

/s/ Matthieu Goddeyne
MATTHIEU GODDEYNE