

**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.

_____/

**DEFENDANT START CONNECTING LLC, DOUGLAS R. GOODMAN, AND
DORIS E. GALLON-GOODMAN'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE FTC'S PROPOSED
STIPULATED PRELIMINARY INJUNCTION**

Defendant Starts Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman ("Defendants"), by undersigned counsel, respectfully move this Court, without opposition, to extend the deadline for them to respond to the Federal Trade

Commission's Proposed Stipulated Preliminary Injunction until September 6, 2024. In support, Defendants state as follows:

I. BACKGROUND

1. On July 9, 2024, the Federal Trade Commission (the "FTC") initiated this action (Doc. 1) and moved *ex parte* 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 (the "TRO") (Doc. 13).

3. On July 11, 2024, Defendants were served (Docs. 14, 15, 16), and, on July 22, 2024, undersigned counsel filed notices of appearance on Defendants' behalf (Docs. 22, 23, 24, 25).

4. On July 22, 2024, counsel for the FTC sent a draft of a proposed stipulated preliminary injunction (the "Stipulated Preliminary Injunction") to undersigned counsel for review.

5. On July 24, 2024, undersigned counsel and counsel for the FTC appeared before the Court for a case-management conference, at which time the Court extended the TRO to September 23, 2024. *See* Doc. 41 at 1.

6. Also at the July 24, 2024, case-management conference, the Court set the deadline for Defendants to respond to the Stipulated Preliminary Injunction as August 30, 2024, and ordered the parties to file a report apprising the Court of the status of any jointly stipulated preliminary injunction order by September 6, 2024. *Id.*; Doc. 37.

7. Since July 24, 2024, the Parties have worked collaboratively toward developing a stipulated preliminary injunction and believe they are close to arriving at a document that is mutually agreeable to the Defendants and the Plaintiff.

8. In light of that effort, and the likelihood that the Parties will arrive at a stipulated preliminary injunction, Defendants now move the Court to extend the August 30, 2024, deadline for them to respond to the Stipulated Preliminary Injunction by one week, until September 6, 2024, so that undersigned counsel and counsel for the FTC may continue negotiating the terms of the Stipulated Preliminary Injunction.

II. LEGAL STANDARD

The Federal Rules of Civil Procedure provide:

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

Defendants seek an extension of the deadline for them to respond to the Stipulated Preliminary Injunction before the current deadline has lapsed. To that end, good cause exists for the requested extension. Undersigned counsel and counsel for the FTC have engaged in extensive discussions and negotiations about the Stipulated Preliminary Injunction. Undersigned counsel and counsel for the FTC are close to finalizing an agreement on the terms of the Stipulated Preliminary Injunction, but they

require more time to continue their discussions. As such, Defendants seek a short, one-week extension of time, until September 6, 2024, so that counsel may continue their discussions. The requested extension of time will not delay this action's progression because the Court has already extended the TRO until September 23, 2024. Further, the requested extension of time will conserve the resources of the FTC and Defendants, as well as the resources of the Court, by facilitating the entry of a preliminary injunction to which Defendants and the FTC intend to reach agreement and stipulate, thereby avoiding motion practice, extensive briefing, and related proceedings. Finally, counsel for the FTC has advised that the FTC does not oppose the requested extension of time.

WHEREFORE, Defendant Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman respectfully request that the Court extend the deadline for them to respond to the Federal Trade Commission's Proposed Stipulated Preliminary Injunction until September 6, 2024.

Date: August 29, 2024.

Respectfully submitted,

/s/ Matthieu Goddeyne

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*Attorneys for Defendant Start Connecting LLC,
Douglas R. Goodman, and Doris E. Gallon-
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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 opposing counsel via e-mail, who advised that the FTC does not oppose the relief requested herein.

/s/ Matthieu Goddeyne

Matthieu Goddeyne

CERTIFICATE OF SERVICE

I certify that on August 29, 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