

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'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Defendant Start Connecting LLC, by undersigned counsel, respectfully moves this Court to extend its deadline to respond to the Complaint from August 30, 2024 to September 16, 2024 – a request which the Plaintiff does not oppose – and in support states 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 Juan S. Rojas (the “Defendants”). Doc. 1.

2. Contemporaneous to the initiation of this action, the FTC moved *ex parte* for a temporary restraining order (the “TRO”) pursuant to Federal Rule of Civil Procedure 65(b), which the Court issued. Doc. 13.

3. On July 24, 2024, counsel for the parties appeared before this Court for a case-management conference, during which the Court extended the TRO to September 23, 2024, and also directed the Defendants to: (1) respond to the Complaint by August 16, 2024, and (2) respond to the FTC’s Motion for Preliminary Injunction by August 30, 2024. Doc. 37.

4. On August 15, 2024, Start Connecting LLC filed a Motion to Continue its deadline to respond to the Complaint, citing concerns regarding whether, in light of the wording of the TRO, Gunster Yoakley & Stewart, P.A. possessed inviolate attorney-client privilege with Start Connecting LLC, or whether the Receiver could waive such privilege. Doc. 44. The Court granted Start Connecting LLC’s motion and extended its deadline to respond to the Complaint to August 30, 2024.

5. On August 16, 2024, Defendants Douglas R. Goodman and Doris E. Gallon-Goodman filed a Motion for More Definite Statement, moving this Court for an Order directing the FTC to file a new Complaint. Doc. 51. On August 23, 2024, the

FTC opposed this request. Doc. 52. The Motion for More Definite Statement is pending.

6. Since August 16, 2024, the Parties have worked to advance this cause. To that end, the Parties have collaborated on the language of a stipulated Preliminary Injunction, and believe they are close to arriving at a document that is mutually agreeable to the Defendants and the Plaintiff. Additionally, the Parties plan to confer next week to negotiate the language of a Case Management Report, as required by Local Rule 3.02, and to discuss the contours of a potential resolution of this matter.

7. On August 30, 2024, Defendant Start Connecting LLC was prepared to file a Motion for More Definite Statement, to accompany the motion filed by Defendants Douglas R. Goodman and Doris E. Gallon-Goodman. However, during the course of a conference with opposing counsel, as required by Local Rule 3.01(g), the Parties agreed that in light of the ongoing effort to arrive at a preliminary injunction as well as the anticipated effort to confer on a Case Management Report and discuss the contours of a potential resolution, the Parties wished to conserve resources if able and move to continue the deadline to respond to the Complaint as well as the deadline to file a Case Management Report to September 16, 2024, and continue their ongoing dialogue in the meantime.¹ As a result, Defendant Start Connecting respectfully requests an extension of time to September 16, 2024, to respond to the Complaint.

¹ Defendants understand that Plaintiff plans to file a motion to continue the deadline to file a Case Management Report shortly.

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

Defendant Start Connecting LLC seeks an extension of the deadline for it to respond to the Complaint to September 16, 2024. 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 as well as this matter in general. Undersigned counsel and counsel for the FTC are close to finalizing an agreement on the terms of the Stipulated Preliminary Injunction, and also plan to negotiate a Case Management Report and discuss the contours of a potential resolution of this matter. In lieu of filing a Motion for More Definite Statement, Defendant requests a brief continuance to September 16, 2024, so the Parties can engage in continued dialogue.

The requested extension of time will not delay this action's progress 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 discussion and possible resolution of several

outstanding issues. Finally, counsel for the FTC has advised that the FTC does not oppose the requested extension of time.

WHEREFORE, Defendant Start Connecting LLC respectfully request that the Court extend the deadline for it to respond to the Complaint to September 16, 2024.

Date: August 30, 2024.

Respectfully submitted,

/s/ Matthieu Goddeyne

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Attorneys for Defendant Start Connecting LLC,

Douglas R. Goodman, and Doris E. Gallon-

Goodman

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 30, 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