

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

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

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.

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

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE CASE MANAGEMENT REPORT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff, the
Federal Trade Commission (“FTC”), respectfully moves this Court, without

opposition, to extend the deadline for filing a civil case management report for good cause. Under Local Rule 3.02(b)(1), the current deadline to file the case management report is Tuesday September 3, 2024. The FTC has conferred with counsel for Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman (the “Florida Defendants”), as well as the Receiver, and they have advised that they do not oppose an extension of the case management report’s deadline to Monday September 16, 2024. The FTC has attempted to confer with *pro se* Defendant Juan S. Rojas regarding this Motion, but has not yet received a response.

Good cause exists for granting this extension under Rule 6(b)(1)(A). The FTC is in the midst of productive discussions with counsel for the Florida Defendants regarding a potential stipulated preliminary injunction. In the interest of bringing those discussions to a prompt conclusion, the FTC seeks a two-week extension of the deadline for filing the civil case management report. The FTC attempted to contact *pro se* Defendant Juan S. Rojas by email promptly after defense counsel’s withdrawal on August 29, 2024, *see* (Doc. 56), and again today with notice of this motion, but he has not yet responded. Additionally, Defendant Start Connecting SAS remains unrepresented following defense counsel’s withdrawal, preventing the FTC

from discussing a case management report with that Defendant.¹ *See id.* As a result, the FTC has been unable to meet with Defendants Juan S. Rojas and Start Connecting SAS about a case management report and seeks an extension of time in which to do so.

WHEREFORE, the FTC respectfully requests that this Court extend the deadline to file a civil case management report under Local Rule 3.02(b)(1) to Monday, September 16, 2024.

Respectfully submitted,

Dated: August 30, 2024

/s/ Nathan H. Nash
Nathan Nash
D'Laney Gielow
Karen D. Dodge
Federal Trade Commission
Midwest Region
230 S. Dearborn, Suite 3030
Chicago, Illinois 60604
Phone: (312) 960-5624
E-mail: nnash@ftc.gov
dgielow@ftc.gov
kdodge@ftc.gov

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

¹ Defense counsel's withdrawal motion listed Defendant Rojas as the point of contact for Defendant Start Connecting SAS, *see* (Doc. 55 at 2), though Defendant Rojas cannot represent Defendant Start Connecting SAS, *see* (Doc. 56 at 1–2 (citing *Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385 (11th Cir. 1985))), which remains under the Receiver's control, *see* (Doc. 13 at 24–26) (providing that the Receiver has full control over Start Connecting SAS, including the ability to hire counsel); *cf.* (Doc. 50).

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), I certify that I met and conferred with counsel for Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman via email on August 30, 2024, and they advised that they do not oppose the relief requested in this Motion. I further certify that I conferred via email with the Receiver on August 30, 2024, who advised that he does not oppose the relief requested in this Motion. Finally, I further certify I attempted to meet and confer with Defendant Juan S. Rojas via email on August 30, 2024, but he has not responded as of the filing of this Motion. In accordance with Local Rule 3.01(g)(3), the FTC will continue to try diligently for three days to contact Defendant Rojas and, if it is able to discern his position, will promptly file a supplement indicating as much.

/s/ Nathan H. Nash
Attorney for Plaintiff FTC

CERTIFICATE OF SERVICE

I certify that, on or about August 30, 2024, I filed this Motion using the Court's electronic filing system, which will deliver a copy of this filing to all counsel of record. I further certify that I am causing a copy of this motion to be sent via FedEx and electronic mail to the following party:

Juan S. Rojas
jayrojas423@gmail.com
Calle 16 N # 6N-21
Oficina (401)
Cali, VC 760045
Colombia

/s/ Nathan H. Nash
Attorney for Plaintiff FTC