

**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, without opposition, to extend its deadline to respond to the Complaint from September 16, 2024, to September 30, 2024, 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, Douglas R. Goodman, Doris E. Gallon-Goodman (together with Start Connecting LLC and Douglas R. Goodman, the “Florida Defendants”), Start Connecting SAS, and Juan S. Rojas (together with the Florida Defendants and Start Connecting SAS, 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. Doc. 44. The Court granted Start Connecting LLC’s motion and extended its deadline to respond to the Complaint to August 30, 2024. Doc. 49.

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 pends.

6. Between August 15, 2024, and August 30, 2024, the Florida Defendants and the FTC worked to advance this action, including collaborating on the language of a Stipulated Preliminary Injunction, which the Court entered on September 11, 2024. Doc. 69. The Florida Defendants and the FTC also planned to discuss potential resolution of this matter.

7. On August 30, 2024, in light of the Florida Defendants and the FTC's efforts to try and resolve their most pressing issues, Start Connecting LLC moved, without opposition, to extend its deadline to respond to the Complaint from August 30, 2024, to September 16, 2024. Doc. 58. Although Defendant Start Connecting LLC was prepared to respond to the Complaint, the FTC and Start Connecting LLC agreed that this extension would conserve resources. The Court granted Start Connecting LLC's Motion and continued its deadline to respond to the Complaint to September 16, 2024. Doc. 60.

8. Since August 30, 2024, counsel for the FTC and counsel for the Florida Defendants conducted their Case Management Conference per Local Rule 3.02 and also discussed the contours of a potential resolution of this matter. The conversation between the Florida Defendants and the FTC regarding potential resolution was positive and productive, but is ongoing and will continue over the coming weeks.

9. As a result of the ongoing nature of potential settlement discussions, Start Connecting LLC respectfully moves this Court for an extension of time to September

30, 2024, to respond to the Complaint. This request is made in the interest of efficiency and not in the interest of undue delay, as it would conserve both resources and time while discussions continue, instead of prematurely pushing this matter into a litigation posture beyond where it currently stands.

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 30, 2024. To that end, good cause exists for the requested extension. Undersigned counsel and counsel for the FTC have started a dialogue as to potential resolution of this action, which dialogue will continue over the coming weeks. As a result of that discussion, Start Connecting LLC requests a brief extension of the deadline to respond to the Complaint so that counsel for the FTC and counsel for the Florida Defendants may focus their efforts on that dialogue.

The requested extension will not delay this action's progress because the Court has already entered the Stipulated Permanent Injunction. Further, the requested extension of time will conserve the resources of the FTC and the Florida Defendants,

including Start Connecting LLC, as well as the resources of the Court, by facilitating discussion and possible resolution. 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 30, 2024.

Date: September 13, 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 September 13, 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