

**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.

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**THE RECEIVER'S SECOND UNOPPOSED MOTION TO EXTEND  
DEADLINE FOR FIRST FEE APPLICATION**

On July 11, 2024, the Court appointed Jared J. Perez as temporary receiver (the “**Receiver**”) over, in relevant part, (1) START CONNECTING LLC, d/b/a USA Student Debt Relief; and (2) START CONNECTING SAS,

d/b/a both USA Student Debt Relief and Start Connecting (collectively, the “**Receivership**” or “**Receivership Entities**”).<sup>1</sup> See Doc. 13 (the “**TRO**”).

With no opposition from the parties, the Receiver, through undersigned counsel, moves the Court to extend the deadline for his first fee application by a week from October 10, 2024 to October 17, 2024.

The Court previously granted the Receiver’s motion to extend this deadline by 30 days. (Doc. 66). The Receiver has drafted his first fee application and shared a draft with counsel for the Plaintiff FTC and the participating Defendants on October 8, 2024. The Defendants, who reside in Sarasota, and their counsel have requested additional time to review the fee application and associated exhibits due to the impacts of the impending Hurricane Milton.

The Receiver’s request for an additional week to file his first fee application is reasonable and not likely to cause any delay in the progress of this case. Both the Plaintiff’s case and the Receivership will proceed during the requested extension period. No party will be prejudiced by the one-week extension.

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<sup>1</sup> On August 15, 2024, the Receiver filed a Notice of Expansion of Receivership to Include Zage Group, LLC. Doc. 47. On August 27, 2024, the Receiver filed Notices of Expansion to include G&G International Consultants SAS and LeadsR4US, LLC. Docs. 53, 54.

**LOCAL RULE 3.01(G) CERTIFICATION**

Neither the Plaintiff FTC nor the participating Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman object to the extension.

**CONCLUSION**

For the foregoing reasons, the Receiver moves the Court to for an extension of time to file his first fee application by one week to October 17, 2024.

Respectfully Submitted,

**s/ Matthew J. Mueller**

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*Counsel for Receiver, Jared J. Perez*

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on September 5, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which served all counsel of record. Defendants Juan S. Rojas and Start Connecting SAS were served by email.

**s/ Matthew J. Mueller**  
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*Counsel for Receiver, Jared J. Perez*