

**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 TO STAY CASE DEADLINES
AS TO THE FTC AND THE FLORIDA DEFENDANTS FOR 60 DAYS
PENDING FTC APPROVAL OF A PROPOSED SETTLEMENT**

The Court-annexed mediation between Plaintiff, the Federal Trade Commission (“Commission” or “FTC”), and Defendants Start Connecting

LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman (the “Florida Defendants”) resulted in FTC counsel and the Florida Defendants agreeing upon settlement terms.¹ *See* M.D. Fla. L.R. 3.09(a). Those monetary and injunctive terms are contained in a proposed stipulated order that the Florida Defendants have signed and that, once approved by the full Commission, would be signed by the FTC and submitted for entry by the Court as a final judgment resolving the FTC’s claims against the Florida Defendants.

As previously explained, *see* (Doc. 125 at 2), a proposed settlement reached during mediation must be approved by a majority of participating Federal Trade Commissioners before FTC counsel has authority to sign the agreement on behalf of the Commission and submit the proposed stipulated order to the Court. *See* 16 C.F.R. § 4.14(c) (providing that the Commission’s final approval authority cannot be delegated to staff). Because the Commission’s formal approval process can take several weeks, and to preserve the settling parties’ resources pending final approval, the FTC is requesting a 60-day stay of all case deadlines as to the FTC and the Florida

¹ The Court-appointed Receiver, Jared J. Perez, and his counsel were present for the mediation, though the remaining Defendants, who remain in default, did not participate in the mediation. The Receiver has reviewed and approved the proposed settlement, but that settlement would not affect the Receiver’s ability to assert his own claims against the Goodman Defendants, separate and apart from the claims that the proposed settlement would resolve between the FTC and the Florida Defendants. In recognition of this, the Receiver and the Goodman Defendants may seek Court approval of a separate settlement releasing the Receiver’s potential claims against the Goodman Defendants.

Defendants so the Commission has sufficient time to consider the proposed settlement. The requested stay would not apply to the Court-appointed Receiver or impact his ability to fulfill his mandate under the preliminary injunction orders. *See* (Docs. 69, 78); *see also, e.g.*, Endorsed Order, Dkt. 228, *CFTC v. Oasis Int’l Grp., Ltd.*, Case No. 8:19-cv-886-T-33SPF (M.D. Fla. Jan. 28, 2020) (a general stay of civil proceedings for a parallel criminal case did not affect the court-appointed receiver’s ability “to fulfill its mandate”). Nor would the requested stay obviate the need to resolve the ancillary litigation prompted by Hamlet Garcia, Jr.’s ongoing campaign of harassment and vexatious lawsuits against the Receiver. *See generally* (Docs. 174, 177–80). Indeed, the Receiver likely cannot wind up his duties and close out the Receivership estate so long as litigation implicating the Receivership *res* remains ongoing.

If the Commission votes to approve the proposed settlement with the Florida Defendants, FTC counsel will promptly file—with this Court’s leave, *see* M.D. Fla. L.R. 3.01(j)—the fully executed proposed stipulated order and move the Court to enter the proposed stipulated order. As previously ordered, *see* (Doc. 96), once the Court enters judgment as to the Florida Defendants, the FTC will then have 35 days to seek a default judgment under Rule 55(b) against the remaining Defendants, Start Connecting SAS and Juan S. Rojas, who are based in Colombia and already in Rule 55(a) default, *see* (Doc. 91).

* * *

For the foregoing reasons, the FTC moves the Court to stay all case-related deadlines as to the FTC and the Florida Defendants for 60 days so the full Commission may consider the proposed settlement. The requested stay would not apply to the Receiver or impact his ability to fulfill his mandate under the preliminary injunction orders, nor should it delay adjudication of the Receiver's request for Court intervention against Hamlet Garcia, Jr. *See* (Doc. 179).

Respectfully submitted,

Dated: April 14, 2025

/s/ D'Laney Gielow
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FEDERAL TRADE COMMISSION

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), I certify that I consulted with counsel for the non-defaulted Defendants and the Court-appointed Receiver about the relief requested in this motion. None of them opposes the requested relief, though the Receiver clarified that the stay requested in this motion should not apply to him. I did not consult with defaulted Defendant Rojas, who no longer responds to communications about this case, nor did I consult with Hamlet Garcia, Jr., who is not a party to this case.

/s/ D'Laney Gielow
Attorney for Plaintiff FTC

CERTIFICATE OF SERVICE

I certify that, on or about April 14, 2025, 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 email to the following *pro se* defaulted Defendant:

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/s/ D'Laney Gielow
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