

**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, *et al.*,

Defendants.

\_\_\_\_\_ /

**RECEIVER’S MOTION FOR LEAVE TO REPLY**

Receiver Jared J. Perez (the “**Receiver**”), by and through undersigned counsel and pursuant to Local Rule 3.01(d), moves for leave to file a reply brief of no more than 7-pages in length to Hamlet Garcia, Jr.’s Court-Ordered Response to Receiver’s Motion (Doc. 179), Filed Pursuant to Court Order (Doc. 182) (Doc. 184, the “**Response**”). On April 11, 2025, the Receiver filed his Motion (1) to Enjoin State Court Defamation Action and (2) For an Order to Show Cause Why Hamlet Garcia Jr. Should Not be Held in Contempt of Court for Violating Injunctions (Doc. 179, the “**Motion to Show Cause**”).

On April 28, 2025, this Court docketed the Response from Garcia. The Response includes new arguments that require additional but brief exposition and factual correction with record evidence, including alleged service issues and the purported inapplicability of the preliminary injunctions to Garcia. For

example, Garcia argues that he was not formally served with the preliminary injunctions, but in the reply, the Receiver will explain that (1) formal service is not necessary, (2) both the FTC and undersigned counsel sent copies of the injunctions to Garcia, and (3) he acknowledged receipt of those documents on multiple occasions and agreed to abide by their requirements. As another example, Garcia argues that he did not act in concert with the defendants to violate the preliminary injunctions, but in the reply, the Receiver will explain that Garcia misconstrues the pertinent provisions and ignores his numerous admissions littered throughout the record of this case about his involvement with the USA Student Debt Relief scheme, including as a former contractor, employee, and purported creditor. Finally, the reply will address the new, second state court action Garcia filed against the Receiver (and the FTC) in retaliation for the Motion to Show Cause. *See* Doc. 180 (related case notice).

The Receiver believes he can address these and other issues in no more than 7 pages and, to ensure this matter can be resolved without delay, the Receiver would endeavor to file the reply within one day of being granted leave to file. The Receiver respectfully submits that he has shown good cause, and the ends of justice would be served by permitting him to file a reply.

WHEREFORE, for the foregoing reasons, the Court should grant this motion for leave to reply.

**LOCAL RULE 3.01(G) CERTIFICATION**

Counsel for the Receiver has conferred with counsel for the FTC and counsel for the participating defendants (*i.e.*, Doug and Doris Goodman) and is authorized to represent to the Court that the parties do not oppose the relief requested in this motion. Defendants Rojas and Start Connecting SAS have defaulted and are not participating in this litigation. The Receiver has not consulted with Garcia because he is not a party.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on April 28, 2025, 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. The following *pro se*, non-party was served by email: Hamlet Garcia, Jr., [hamletgarciajr@gmail.com](mailto:hamletgarciajr@gmail.com).

Respectfully submitted,

**s/ Matthew J. Mueller**

Matthew J. Mueller, FBN: 0047366

FOGARTY MUELLER HARRIS, PLLC

501 E. Kennedy Blvd., Suite 1030

Tampa, Florida 33602

Tel: 813-682-1730

Fax: 813-682-1731

Email: [matt@fmhlegal.com](mailto:matt@fmhlegal.com)

*Counsel for Receiver, Jared J. Perez*