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.	

RECEIVER'S NOTICE OF SUPPLEMENTAL AUTHORITY

The Court-appointed receiver Jared J. Perez (the "Receiver"), pursuant to Local Rule 3.01(i), hereby provides this Court with notice of the following supplemental authority with respect to the Receiver's 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).

1. Citation:

Case 8:24-cv-01626-KKM-AAS

Order Granting Oral Motion To Continue Pending M.D. FLA. Federal Court Ruling On Motion For Order to Show Cause Against Plaintiff, *Hamlet Garcia II*, v. *Jared J. Perez*, Case No.: 25-003322-SC, Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida, Small Claims Division. (**Exhibit 1** to this Notice).

2. Document, pages, and lines of issue/argument that the supplemental authority supports:

Doc. 179 at 12-25, passim; Doc. 191 at 7.

3. Succinct quotation from authority:

"Following Judge Mizelle's ruling, the Court will entertain a motion to dismiss this case, if appropriate, based on the contents of the federal court order, among other potential arguments." (Ex. 1 at 2).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 8, 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 prose, non-party was served by email: Hamlet Garcia, Jr., hamletgarciajr@gmail.com.

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

Counsel for Receiver, Jared J. Perez

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA SMALL CLAIMS DIVISION

HAMLET GARCIA, II,		
Plaintiff,		Case No.: 25-003322-SC
v.		
JARED J PEREZ,		
Defendant.	,	
	/	

ORDER GRANTING ORAL MOTION TO CONTINUE PENDING M.D. FLA. FEDERAL COURT RULING ON MOTION FOR ORDER TO SHOW CAUSE AGAINST PLAINTIFF

This matter came before the Court on May 6, 2025, upon the oral Motion to Continue made by counsel for Jared J. Perez (the "Federal Receiver"), in the above-captioned case. The Court, having considered the motion and being fully advised in the premises, IT IS HEREBY ORDERED:

The oral Motion to Continue is **GRANTED** and the pretrial hearing is rescheduled for at least 90 days from May 6, 2025 – *i.e.*, on or after August 5, 2025, at 10 A.M. EST. If necessary, further extensions will be granted to allow for a ruling by the Honorable Judge Kathryn Kimball Mizelle of the United States District Court for the Middle District of Florida on the Federal Receiver's Motion for an Order to Show Cause Why Hamlet Garcia Jr. [*i.e.*, Hamlet Garcia, II] Should Not be Held in

Contempt of Court, which was filed on April 11, 2025, and in currently pending in *F.T.C. v. Start Connecting, LLC, et al*, M.D. Fla. Case No. 8:24-cv-1626-KKM-AAS (Doc. 179). Following Judge Mizelle's ruling, the Court will entertain a motion to dismiss this case, if appropriate, based on the contents of the federal court order, among other potential arguments.

DONE AND ORDERED on

Electronically Conformed 5/8/2025 John Carassas

County Court Judge