

**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 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 30 days to October 10, 2024.

### **BACKGROUND**

Section XVIII of the TRO directs the Receiver to “file with the Court and serve on the parties periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of entry of this Order.” Doc. 13 at 36. This would make the first fee application due on September 10, 2024.

Since his appointment on July 11, 2024, the Receiver and his retained professionals have taken substantial steps to implement the terms of the TRO. See generally Doc. 26 (The Receiver Preliminary Interim Report). The Receiver is in the process of collecting and reviewing invoices from his retained professionals in order to draft the first fee application. This first fee application will cover all activity from inception of the Receivership through the end of August, making the current deadline difficult to meet. Given the workload

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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.

involved in the onset of this Receivership, the Receiver needs additional time to prepare the fee application and to confer with the parties prior to filing it as required under Local Rule 3.01(g).

### **ARGUMENT**

The Receiver's request for an additional 30 days to prepare and 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. Neither the Plaintiff FTC nor the represented Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman object to the extension. No party will be prejudiced by the 30-day extension.

### **LOCAL RULE 3.01(G) CERTIFICATION**

Counsel representing the Plaintiff FTC and Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman informed undersigned counsel that their respective clients did not oppose the extension. Defendants Juan S. Rojas, who is named individually and as an officer of Start Connecting LLC and Start Connecting SAS, was contacted by email on September 4, 2024 for his position on the Motion and has not responded to date. The Receiver will update this certification if and when Mr. Rojas responds, however, his former counsel has withdrawn and Mr. Rojas has not been responsive to prior communications from the Receiver.

**CONCLUSION**

For the foregoing reasons, the Receiver moves the Court to for an extension of time to file his first fee application by 30 days to October 10, 2024.

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*

**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**  
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*