

**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,
START CONNECTING SAS,
DOUGLAS R. GOODMAN,
DORIS E. GALLON-GOODMAN,
AND JUAN S. ROJAS,

Defendants.

Uniform Case Management Report

Plaintiff, Federal Trade Commission (“FTC”), and Defendants Start Connecting LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman (the “Florida Defendants”), through counsel, pursuant to Fed. R. Civ. P. 16 and 26, and Local Rule 3.02, hereby submit the below Case Management Report.

1. Date and Attendees

The parties may conduct the planning conference “in person, by telephone, or by comparable means[.]” *See* Local Rule 3.02(a)(1).

The parties conducted the planning conference on 9/11/2024. D’Laney Gielow and Taylor Arana attended the conference on behalf of the Federal Trade Commission. Matthieu Goddeyne, Melanie Senosiain, and Gregory Pierson attended the conference on behalf of the Florida Defendants. Further, Jared Perez, as Court-Appointed Receiver, attended the conference. The parties conducted the conference by videoconference.

The FTC represents that *pro se* Defendant Juan S. Rojas did not respond to the FTC’s requests to schedule a Case Planning Conference. Mr. Rojas did not participate in the drafting of this Report nor did he attend the conference. Mr. Rojas’s company, Corporate Defendant Start Connecting SAS, is currently without counsel and did not participate in the drafting of this Report nor did it attend the conference through counsel.

2. Deadlines and Dates

The parties request these deadlines and dates:

Action or Event	Date
Deadline for providing mandatory initial disclosures. <i>See</i> Fed. R. Civ. P. 26(a)(1).	9/25/2024
Deadline for moving to join a party, <i>see</i> Fed. R. Civ. P. 14, 19, and 20, or amend the pleadings, <i>see</i> Fed. R. Civ. P. 15(a).	11/4/2024
Deadline for serving expert disclosures under Rule 26(a)(2), including any report required by Rule 26(a)(2)(B).	Plaintiff 5/19/2025
	Defendant 6/16/2025
	Rebuttal 6/30/2025
Deadline for completing discovery and filing any motion to compel discovery. <i>See</i> Fed. R. Civ. P. 37; <i>Middle District Discovery</i> (2021).	7/21/2025
Deadline for moving for class certification, if applicable. <i>See</i> Fed. R. Civ. P. 23(c).	N/A
Deadline for filing any dispositive and <i>Daubert</i> motion. <i>See</i> Fed. R. Civ. P. 56. (Must be at least five months before requested trial date.)	9/2/2025
Deadline for participating in mediation. <i>See</i> Local Rules, ch. 4. Robert M. Daisley 4006 S. MacDill Ave. Tampa, FL 33611 (813) 835-7722	8/4/2025
Date of the final pretrial meeting. <i>See</i> Local Rule 3.06(a).	2/2/2026
Deadline for filing the joint final pretrial statement, any motion in limine, proposed jury instructions, and verdict form. <i>See</i> Local Rule 3.06(b). (Must be at least seven days before the final pretrial conference.)	2/16/2026
Date of the final pretrial conference. <i>See</i> Fed. R. Civ. P. 16(e); Local Rule 3.06(b).	3/2/2026
Month and year of the trial term.	April 2026

The trial will last approximately 7 days and be

- jury.
- non-jury.

3. Description of the Action

The FTC alleges that Defendants have advertised, marketed, and sold student loan debt relief services in this District and throughout the United States by misrepresenting an official affiliation, making false or unsubstantiated promises of debt relief, and pocketing consumers' payments rather than applying them to consumers' loans. The FTC further alleges that Defendants advertised their services using fake reviews and testimonials, provided Spanish-speaking consumers with contracts written in English, collected illegal advance fees, and failed to pay for access to and called numbers listed on the National Do Not Call Registry. The FTC alleges that these deceptive and unfair acts and practices violate Section 5 of the FTC Act, the Telemarketing Sales Rule, and the Gramm-Leach-Bliley Act, and caused millions of dollars in consumer injury.

The Florida Defendants deny that they have violated the FTC Act, the Telemarketing Sales Rule, or the Gramm-Leach-Bliley Act through any of the alleged actions or omissions. Defendants Douglas R. Goodman and Doris E. Gallon-Goodman have moved the Court under Rule 12(e) to strike the Complaint and grant the FTC leave to file an amended complaint that complies with applicable pleading requirements under the Federal Rules of Civil Procedure (Doc. 51). Further, the Florida Defendants contend that they have several valid defenses to the FTC's allegations and claims, which they will raise at the appropriate time in this action.

4. Disclosure Statement

- Each party has filed a [disclosure statement](#) using the required form.

5. Related Action

- The parties acknowledge their continuing duty under Local Rule 1.07(c) to notify the judge of a related action pending in the Middle District or elsewhere by filing a "Notice of a Related Action." No notice need be filed if there are no related actions as defined by the rule.

6. Consent to a Magistrate Judge

“A United States magistrate judge in the Middle District can exercise the maximum authority and perform any duty permitted by the Constitution and other laws of the United States.” Local Rule 1.02(a). With the parties’ consent, a district judge can refer any civil matter to a magistrate judge for any or all proceedings, including a non-jury or jury trial. 28 U.S.C. § 636(c).

The Court asks the parties and counsel to consider the benefits to the parties and the Court of consenting to proceed before a magistrate judge. Consent can provide the parties certainty and flexibility in scheduling. Consent is voluntary, and a party for any reason can decide not to consent and continue before the district judge without adverse consequences. *See* Fed. R. Civ. P. 73(b)(2).

The parties do consent and file with this case management report a completed Form AO 85 “Notice, Consent, and Reference of a Civil Action to a Magistrate Judge,” which is available on the Court’s website under “Forms.”

The parties do not consent.

7. Preliminary Pretrial Conference

The parties do not request a preliminary pretrial conference before the Court enters a scheduling order.

The parties do request a preliminary pretrial conference, and the parties want to discuss

8. Discovery Practice

The parties should read the Middle District Discovery Handbook, available on the Court’s website at fimd.uscourts.gov/civil-discovery-handbook, to understand discovery practice in this District.

The parties confirm they will comply with their duty to confer with the opposing party in a good faith effort to resolve any discovery dispute before filing a motion. *See* Local Rule 3.01(g); *Middle District Discovery* (2021) at § I.A.2.

9. Discovery Plan

The parties submit the following discovery plan under Rule 26(f)(2):

A. The parties agree to the timing, form, or requirement for disclosures under Rule 26(a):

- Yes.
- No; instead, the parties agree to these changes: .

B. Discovery may be needed on these subjects: (1) whether the Defendants violated (i) Section 5 of the FTC Act, (ii) the Telemarketing Sales Rule, and (iii) the Gramm-Leach-Bliley Act; (2) Individual Defendants' liability for the alleged violations; (3) the amount of consumer injury resulting from Defendants' alleged deceptive and unfair acts and practices; (4) Defendants' assets; (5) the FTC's investigation of Defendants' business practices; (6) the alleged "common enterprise"; and (7) the extent of Douglas Goodman's and Doris E. Gallon-Goodman's purported involvement in the alleged "common enterprise." The parties preparing this Case Management Report do not intend for this list to be exhaustive.

C. Discovery should be conducted in phases:

- No.
- Yes.

D. Are there issues about disclosure, discovery, or preservation of electronically stored information?

- No.
- Yes.

E. The parties have considered privilege and work-product issues, including whether to ask the Court to include any agreement in an order under Federal Rule of Evidence 502(d).

F. The parties stipulate to changes to the limitations on discovery imposed under the Federal Rules of Civil Procedure and Local Rule 3.04 or other limitations:

- No.
- Yes.

10. Request for Special Handling

- The parties do not request special handling.
- The parties request special handling.

unilaterally requests special handling.

11. Certification of familiarity with the Local Rules

The parties certify that they have read and are familiar with the Court's Local Rules.

12. Signatures

Respectfully submitted,

Date: September 13, 2024

/s/ D'Laney Gielow
Nathan Nash, D'Laney Gielow,
Karen Dodge
Attorneys for Federal Trade Commission

/s/ Gregory Pierson
John A. Schifino, Matthieu Goddeyne,
Melanie B. Senosiain, Gregory Pierson
Gunster, Yoakley & Stewart, P.A.
Attorneys for Defendants
Start Connecting LLC,
Douglas R. Goodman, and
Doris E. Gallon-Goodman

CERTIFICATE OF SERVICE

I certify that, on or about September 13, 2024, I filed this Case Management Report 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 filing to be sent via FedEx and electronic mail to the following party:

Juan S. Rojas
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/s/ D'Laney Gielow
Attorney for Plaintiff FTC