

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

BURTON W. WIAND, as Receiver for
OASIS INTERNATIONAL GROUP, LTD.;
OASIS MANAGEMENT, LLC; AND
SATELLITE HOLDINGS COMPANY,

Plaintiff,

v.

Case No: 8:20-cv-00862-VMC-TGW

CHRIS AND SHELLEY ARDUINI, et al.,

Defendants.

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT AGAINST
DEFENDANT JAMES JACKSON**

Plaintiff, BURTON W. WIAND, as Receiver for OASIS INTERNATIONAL GROUP, LTD.; OASIS MANAGEMENT, LLC; AND SATELLITE HOLDINGS COMPANY ("***Plaintiff***"), through undersigned counsel and pursuant to Fed. R. Civ. P. 55(a), moves the Clerk of Court to enter a default against Defendant, JAMES JACKSON ("***Jackson***"), for failure to plead or otherwise defend, and states:

1. On April 14, 2020, Plaintiff filed his Complaint against Jackson (Doc. 1).
2. On July 1, 2020, Plaintiff served Jackson with the summons and complaint. See Affidavit of Service filed on July 16, 2020 (Doc. 205), attached hereto as **Exhibit "A."**
3. As of the date of this filing, Jackson has not filed a responsive pleading or otherwise defended this action.

ENGLANDER FISCHER
ATTORNEYS

721 First Avenue North • St. Petersburg, Florida 33701
Phone (727) 898-7210 • Fax (727) 898-7218
eflegal.com

WHEREFORE, Plaintiff moves the Clerk of Court for entry of a Clerk's Default against Jackson.

July 28, 2020.

Respectfully submitted,

ENGLANDER FISCHER

/s/ Beatriz McConnell

JOHN W. WAECHTER

Florida Bar No. 47151

Primary: jwaechter@eflegal.com

Secondary: dturner@eflegal.com

COURTNEY L. FERNALD

Florida Bar No. 52669

Florida Bar Certified, Appellate Practice

Primary: cfernald@eflegal.com

Secondary: tdillon@eflegal.com

BEATRIZ MCCONNELL

Florida Bar No. 42119

Primary: bmccconnell@eflegal.com

Secondary: tdillon@eflegal.com

ALICIA GANGI

Florida Bar No. 1002753

Primary: agangi@eflegal.com

Secondary: tdillon@eflegal.com

ENGLANDER and FISCHER LLP

721 First Avenue North

St. Petersburg, Florida 33731-1954

(727) 898-7210 / Fax (727) 898-7218

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system and served a copy by U.S. Mail to James Jackson, 2155 Rainlilly Drive, Center Valley, PA 18034.

/s/ Beatriz McConnell

Attorney for Plaintiff

AFFIDAVIT OF SERVICE

UNITED STATES DISTRICT COURT
District of Florida

Case Number: 8:20-CV-00862-VMC-TGW

Plaintiff:

BURTON W. WIAND, as Receiver for OASIS INTERNATIONAL GROUP, LTD.; OASIS MANAGEMENT, LLC; AND SATELLITE HOLDINGS COMPANY,

vs.

Defendant:

CHRIS AND SHELLEY ARDUINI, et al.,

For:

Beatriz McConell
ENGLANDER FISCHER
721 1ST AVE NO
ST PETERSBURG, FL 33701



RCG2020005074

Received by Chad Spotts on the 24th day of June, 2020 at 12:30 pm to be served on **James Jackson, 2155 Rainlilly Drive, Center Valley, PA 18034.**

I, Chad Spotts, being duly sworn, depose and say that on the **1st day of July, 2020 at 1:17 pm, I:**

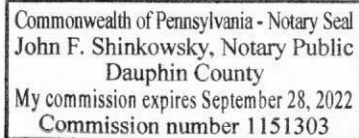
SUBSTITUTE served by delivering a true copy of the **SUMMONS IN A CIVIL ACTION, COMPLAINT, CIVIL COVER SHEET and EXHIBITS A-D (SERVED EXHIBITS VIA CD)** with the date and hour of service endorsed thereon by me, to: **Tim Hunte as Step-Son/ Co-Resident** at the address of: **2155 Rainlilly Drive, Center Valley, PA 18034** the within named person's usual place of **Abode**, who resides therein, who is fifteen (15) years of age or older and informed said person of the contents therein, in compliance with state statutes.

Military Status: Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

Marital Status: Based upon inquiry of party served, Defendant is married.

Description of Person Served: Age: 45, Sex: M, Race/Skin Color: Black, Height: 5'8", Weight: 180, Hair: Black, Glasses: -

If a description of the party served is provided, please note all information provided is approximate. F.S. 48.021(1)(Services of Summons and Criminal Subpoenas) I certify that I am over the age of 18, have no interest in the above action, and am a Certified/Special/Appointed Process Server or authorized to serve process in the judicial circuit, county, or state where service was effectuated. F.S. 92.525 Under penalties of perjury, I declare that I have read the foregoing affidavit/proof of service and that the facts stated in it are true. (No Notary Required) (Services of subpoenas F.S. 48.021(1) (Rule 1.410)) I am over the age of 18, and am not a party to nor interested in the outcome of the above styled case. I have personal knowledge of the facts and statements contained in this affidavit and each is true and correct. (Out of State/Foreign Process in accordance with F.S. 48.194 by any person authorized to server process in the state where the person or entity is served) Notary Required.



Subscribed and Sworn to before me on the 14th day of July, 2020 by the individual effectuating/ attempted service, who is personally known to me, by means of ☒ physical presence or ☐ online notarization.

NOTARY PUBLIC

Chad Spotts

TRGT Legal
PO Box 1066
Pinellas Park, FL 33781
(888) 642-0130

Our Job Serial Number: RCG-2020005074
Ref: 2450

