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 <u>DEFENDANT IMPULSE VENTURES, INC.</u>

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, IMPULSE VENTURES, INC. ("*Impulse Ventures*"), for failure to plead or otherwise defend, and states:

- 1. On April 14, 2020, Plaintiff filed his Complaint against Impulse Ventures (Doc. 1).
- 2. On July 7, 2020, Plaintiff served Impulse Ventures with the summons and complaint. See Affidavit of Service filed on July 10, 2020 (Doc. 191), attached hereto as **Exhibit** "A."
- 3. As of the date of this filing, Impulse Ventures has not filed a responsive pleading or otherwise defended this action.

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

ENGLANDER FISCHER

ATTORNEYS

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

August 4, 2020.

Respectfully submitted,

ENGLANDER FISCHER

/s/ Beatriz McConnell

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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 Impulse Ventures, c/o Ron Clark, 6016 Hardrock Circle, Orlando, FL 32819.

AFFIDAVIT OF SERVICE

UNITED STATES DISTRICT COURT Middle District of Florida

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

TGW

Plaintiff:
BURTON W. WIAND, as Receiver for OASIS INTERNATIONAL GROUP, LTD:



Defendant:

CHRIS AND SHELLEY ARDUINI, et al.,

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

Received by Travis J. Foster on the 22nd day of June, 2020 at 8:42 am to be served on Impulse Ventures, Inc. c/o Ron Clark, 7307 Ripley Court, Orlando, FL 32836.

I, Travis J. Foster, being duly sworn, depose and say that on the 7th day of July, 2020 at 5:05 pm. I:

CORPORATE: Served Impulse Ventures, Inc. by delivering a true copy of the SUMMONS IN A CIVIL ACTION, COMPLAINT, CIVIL COVER SHEET and EXHIBITS A-D with the date and hour of service endorsed thereon by me, to: Ron Clark as Authorized Agent for Impulse Ventures, Inc., at the address of: 6016 Hardrock Circle, Orlando, FL 32819, and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service:

7307 Rippley Court, Orlando, FL 32836

06/24/2020 2:52 pm - No answer. Vehicle visible, tag G5843J Honda. 06/25/2020 8:20 pm - Kanhai residence for six months. Not known. LZTQ89 Nissan and G5843J Honda.

6016 Hardrock Circle, Orlando, FL 32819

07/07/2020 5:05 pm - Service effected at this address.

Description of Person Served: Age: 56, Sex: M, Race/Skin Color: White, Height: 6'0", Weight: 180, Hair: Grey, Glasses: Y

AFFIDAVIT OF SERVICE For 8:20-CV-00862-VMC-TGW

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server or Special Process Server in good standing in the judicial circuit in which the process was served. Under Penalties of Perjury, I Declare I have Read the Foregoing Document and the Facts Stated in it are True. No Notary is Required Pursuant to Florida State Statute 92.525(2).

STATE OF FLORIDA **COUNTY OF ORANGE**

Sworn to (or affirmed) and subscribed before me by means of [x] physical presence or [] online notarization on the 8th day of July, 2020 by the affiant who is personally known to me.

NOTARY PUBLIC

TRGT Legal PO Box 320423 Tampa, FL 33679

Travis J. Foster CPS #0198

(888) 642-0130

Our Job Serial Number: RCG-2020005078

Ref: 2450

REGINA MOORE

MY COMMISSION # GG 075410

EXPIRES; February 21 c 000 ight @ 1992-2020 Database Services, Inc. - Process Server's Toolbox V8.1m

Bonded Thru Budget Notary Services

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT for the Middle District of Florida Time: 5.54 BURTON W. WIAND, as Receiver for OASIS INTERNATIONAL GROUP, LTD.; OASIS MANAGEMENT, LLC; AND SATELLITE HOLDINGS COMPANY, V. Civil Action No. 8:20-cv-00862-VMC-TGW CHRIS AND SHELLEY ARDUINI. et al. Defendant(s) SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Impulse Ventures, Inc. c/o Ron Clark
7307 Ripley Court
Orlando, FL 32836

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Beatriz McConnell Englander Fischer 721 First Avenue North St. Petersburg, FL 33701

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.