

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.

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**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT AGAINST  
DEFENDANT JOSEPH LAVECCHIA**

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, JOSEPH LAVECCHIA ("***J. LaVecchia***"), for failure to plead or otherwise defend, and states:

1. On April 14, 2020, Plaintiff filed his Complaint against J. LaVecchia (Doc. 1).
2. On July 8, 2020, Plaintiff served J. LaVecchia with the summons and complaint. See Affidavit of Service filed on July 16, 2020 (Doc. 214), attached hereto as **Exhibit "A."**
3. As of the date of this filing, J. LaVecchia 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 J. LaVecchia.

August 4, 2020.

Respectfully submitted,

ENGLANDER FISCHER

/s/ Beatriz McConnell

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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 J. LaVecchia, 121 Pine Rd., Copake, NY 12516.

**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

Received by Richard Lorberer, Jr. on the 25th day of June, 2020 at 1:18 pm to be served on **Joseph LaVecchia, 121 Pine Road, Copake, NY 12516.**

I, Richard Lorberer, Jr., being duly sworn, depose and say that on the **8th day of July, 2020 at 7:45 am, I:**

**INDIVIDUALLY/PERSONALLY served Joseph LaVecchia 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: Joseph LaVecchia at the address of: 121 Pine Road, Copake, NY 12516, and informed said person of the contents therein, in compliance with state statutes. I further certify that I placed the time, date of service, my initials, and my Server ID # (if applies) on the Summons and/or Subpoena when served.**

**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: 60, Sex: M, Race/Skin Color: White, Height: 5'8", Weight: 210, Hair: Bald, Glasses: N

 **COPY**



**EXHIBIT A**

**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. Under penalties of perjury, I declare I have read the foregoing document and the facts stated are true.

Subscribed and Sworn to before me on the 13<sup>th</sup>  
day of July, 2020 by the affiant  
who is personally known to me.

  
NOTARY PUBLIC

  
Richard Lorberer, Jr.

TRGT LEGAL  
P.O. BOX 1066  
PINELLAS PARK, FL 33781  
(888) 642-0130

Our Job Serial Number: RCG-2020005096  
Ref: 2450

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**KIM P. LETUS**  
NOTARY PUBLIC  
STATE OF NEW YORK  
QUALIFIED IN ULSTER COUNTY  
COMM. EXPIRES MARCH 30, 2023



**COPY**

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

# UNITED STATES DISTRICT COURT

for the

Middle District of Florida

Date: 7/8/20

Time: 10:45 AM

Initials: KL

ID#: \_\_\_\_\_

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

*Plaintiff(s)*

v.

CHRIS AND SHELLEY ARDUINI, et al.

*Defendant(s)*

Civil Action No. 8:20-cv-00862-VMC-TGW

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Joseph LaVecchia  
121 Pine Road  
Copake, NY 12516

A lawsuit has been filed against you.

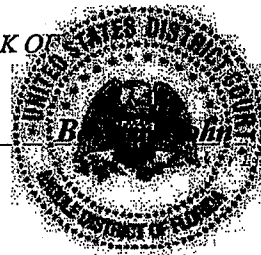
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the 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.

Date: 06/11/2020

CLERK OF



Deputy Clerk

COPY