

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 FORD SUMNER**

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, FORD SUMNER ("***Ford Sumner***"), for failure to plead or otherwise defend, and states:

1. On April 14, 2020, Plaintiff filed his Complaint against Ford Sumner (Doc. 1).
2. On July 1, 2020, Ford Sumner waived service of the summons and complaint. See Waiver of Service filed on July 1, 2020 (Doc. 171), attached hereto as **Exhibit "A."**
3. As of the date of this filing, Ford Sumner 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 Ford Sumner.

ENGLANDER FISCHER  
ATTORNEYS

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

August 17, 2020.

Respectfully submitted,

ENGLANDER FISCHER

/s/ John W. Waechter

JOHN W. WAECHTER

Florida Bar No. 47151

Primary: [jwaechter@eflegal.com](mailto:jwaechter@eflegal.com)

Secondary: [dturner@eflegal.com](mailto:dturner@eflegal.com)

COURTNEY L. FERNALD

Florida Bar No. 52669

Florida Bar Certified, Appellate Practice

Primary: [cfernald@eflegal.com](mailto:cfernald@eflegal.com)

Secondary: [tdillon@eflegal.com](mailto:tdillon@eflegal.com)

BEATRIZ MCCONNELL

Florida Bar No. 42119

Primary: [bmccconnell@eflegal.com](mailto:bmccconnell@eflegal.com)

Secondary: [tdillon@eflegal.com](mailto:tdillon@eflegal.com)

ALICIA GANGI

Florida Bar No. 1002753

Primary: [agangi@eflegal.com](mailto:agangi@eflegal.com)

Secondary: [tdillon@eflegal.com](mailto: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 Ford Sumner, L7 Midland Chambers, 45 Johnston Street, Wellington 6011, P.O. Box 25299, Wellington 5140, New Zealand.

/s/ John W. Waechter

*Attorney for Plaintiff*

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**WAIVER OF THE SERVICE OF SUMMONS**

TO: Beatriz McConnell, Esquire  
Englander and Fischer LLP  
721 First Ave. North  
St. Petersburg, FL 33701

I acknowledge receipt of your request that I, or the entity I represent, waive service of summons in the above-captioned lawsuit, along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to avoid the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will retain all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 90 days from May 4, 2020, the date when this request was sent. If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date: 1 July 2020

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Ford Sumner, signed by  
Jaeson Robert Sumner, partner

**Exhibit "A"**