

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 DIVERGENT INVESTMENTS LLC**

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, DIVERGENT INVESTMENTS LLC ("***Divergent***"), for failure to plead or otherwise defend, and states:

1. On April 14, 2020, Plaintiff filed his Complaint against Divergent (Doc. 1).
2. On September 24, 2020, Plaintiff served Divergent with the summons and complaint by service through drop box as per COVID requirements at 301 Preston Street, Baltimore, MD 21201. See Affidavit of Service filed on September 25, 2020 (Doc. 478) attached hereto as **Exhibit "A."**
3. As of the date of this filing, Divergent 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 Divergent.

October 16, 2020

Respectfully submitted,

ENGLANDER FISCHER

/s/ John W. Waechter

JOHN W. WAECHTER

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(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 Divergent Investments LLC, 301 Preston Street, Baltimore, MD 21201.

/s/ John W. Waechter

*Attorney for Plaintiff*

**RETURN OF SERVICE**

UNITED STATES DISTRICT COURT  
Middle District of Florida

Case Number: 8:20-CV-862

Plaintiff:

**BUTON W. WAND, OASIS INTERNATIONAL GROUP, LTD., OASIS MANAGEMENT,  
LLC. and SATELLITE HOLDINGS COMPANY**

vs.

Defendant:

**CHRIS AND SHELLEY ARDUINI, et al.,**

For:

Beatriz McConnell

Received by PARALAW SERVICES on the 24th day of September, 2020 at 10:28 am to be served on **DIVERGENT INVESTMENTS, LLC. c/o Ronald D. Lawrence, Jr. co Maryland State Department of Assessments and Taxation, 301 Preston St., Baltimore, MD 21201.**

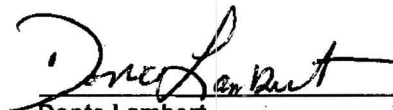
I, Donte Lambert, do hereby affirm that on the **24th day of September, 2020 at 11:49 am, I:**

served an **AUTHORIZED** entity by delivering a true copy of the **SUMMONS, AFFIDAVIT OF EVASION with Exhibits and COMPLAINT with Exhibits A-D** with the date and hour of service endorsed thereon by me, to: **DROP BOX as Per COVID Requirement - See Below** at the address of: **301 Preston St., Baltimore, MD 21201**, who stated they are authorized to accept service for **DIVERGENT INVESTMENTS, LLC. c/o Ronald D. Lawrence, Jr.**, and informed said person of the contents therein, in compliance with state statutes.

**Additional Information pertaining to this Service:**

**\*\*\*DUE TO COVID, THE OFFICE WAS CLOSED TO THE PUBLIC. THERE WAS A NOTE ON THE DOOR TO SERVE BY DROPPING IN A DROP BOX\*\*\***

I certify that I have no interest in the above action, and am a Certified Process Server in good standing. Under penalties of perjury, I declare I have read the foregoing document and the facts stated herein are true. **NO NOTARY REQUIRED** pursuant to Florida Statute 92.525(2). If there is no description of person served, servee may have signed receipt on server field sheet.



Donte Lambert  
Process Server

**PARALAW SERVICES  
Post Office Box 13434  
Tampa, FL 33681-3434  
(813) 846-5869**

Our Job Serial Number: JMS-2020002955  
Ref: Wiand 6005.004



**Exhibit "A"**

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

# UNITED STATES DISTRICT COURT

for the

Middle District of Florida

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)*

9-24-20 @ 11:49 AM  
Donte Lambert

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

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Divergent Investments, LLC  
c/o Ronald D. Lawrence, Jr.  
16110 West Course Drive  
Tampa, 33624

c/o Maryland State  
Department of Assessment  
And Taxation  
301 W. Preston St.  
Baltimore, MD 21201

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:

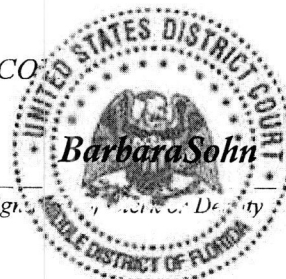
Beatriz McConnell  
Englander Fischer  
721 First Avenue North  
St. Petersburg, FL 33701

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.

**Jun 11, 2020**

Date: \_\_\_\_\_

CLERK OF COURT



Signature of Clerk  
Barbara Sohn  
Clerk