

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:21-cv-23472-RNS

Ryan Birmingham, Roman Leonov, Steven Hansen,
Mitchell Parent, and Jonathan Zarley, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

Alex Doe, *et al.*,

Defendants.

***UNOPPOSED NOTICE OF SETTLEMENT DISCUSSIONS AND MOTION TO STAY
DEADLINES RELATED TO DEFENDANT JARED GOODYEAR PENDING
FINALIZATION OF SETTLEMENT***

Ryan Birmingham, Roman Leonov, Steven Hansen, Mitchell Parent, and Jonathan Zarley, and others similarly situated (collectively “Plaintiffs”), and Defendant Jared Goodyear (“Goodyear”), have agreed in principle to settle this action. Pursuant to Local Rule 16.4, Plaintiffs submit this Unopposed Notice of Settlement and Motion to Stay Deadlines Related to Defendant Jared Goodyear Pending Finalization of Settlement (the “Motion”). The Parties anticipate that they will need up to thirty days to finalize the settlement and voluntarily dismiss the action against Goodyear. To conserve the parties’ and the Court’s resources, the Plaintiffs move to stay all deadlines related to Goodyear for thirty (30) days.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(3)

Pursuant to Local Rule 7.1(a)(3), I hereby certify that Andrew Balthazor, counsel for Plaintiffs, conferred with Arianna M. Mendez and Robert Cooke (counsel for Jared Goodyear) regarding an extension of time to Respond to Goodyear’s Motion to Dismiss [ECF No. 166] in order to finalize settlement discussions. Ms. Mendez stated that they would rather administratively stay proceedings as to their client, Goodyear, until the settlement is finalized; Plaintiffs agree and respectfully submit this *Unopposed* Motion in support.

Dated: July 19, 2022.

Respectfully submitted,

/s/ Dennis A. González

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or about July 19, 2022, a true and accurate copy of Plaintiffs’ Motion was served on counsel of record via the CM/ECF system. For parties that do not receive Notices of Electronic Filing, the undersigned further certifies that a copy of the foregoing documents was served upon Defendants at the addresses listed below via mail or as otherwise indicated:

Art Sea Group Ltd. Via publication on Plaintiffs’ website	Auro Advantages, LLC Via publication on Plaintiffs’ website
Easy Com, LLC c/o Registered Agent	Marina Garda Via publication on Plaintiffs’ website

159 Main Street, Unit 100, Nashua, NH 03060	
Global E-Advantages LLC c/o Registered Agent North West Registered Agent LLC 8 The Green, Suite B, Dover, DE 19901	Groves, LLC c/o Registered Agent Delaware Business Incorporators 3422 Old Capitol Trail, Suite 700 Wilmington, DE 19808
Ivan Hrechaniuk Via direct message to his LinkedIn profile	Borys Konovalenko Via email to borys.konovalenko@gmail.com
Mayon Solutions Ltd Via email to info@mayon.solutions and sales@mayon.solutions	Mayon Solutions, LLC (1) c/o Registered Agents, Inc. 159 Main Street, Unit 100, Nashua, NH 03060; and (2) Via courtesy email to Mayon.llc@gmail.com
Notus, LLC c/o Registered Agent Colorado Registered Agent LLC 1942 Broadway Street, Suite 314C, Boulder, CO 80302	Profit Media Group LP 4 Queen Street, Suite 1, Edinburgh, GB, EH21JE
Shopostar, LLC c/o Registered Agent Colorado Registered Agent LLC 1942 Broadway Street, Suite 314C, Boulder, CO 80302	Olga Tielly 3rd Floor 207 Regent Street, London, United Kingdom W1B3HH
Trans-Konsalt MR Ltd. Via publication on Plaintiffs' website.	

Respectfully submitted,

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