

**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.

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**PLAINTIFFS' FIRST ADMINISTRATIVE STATUS REPORT**

Plaintiffs Ryan Birmingham, Roman Leonov, Steven Hansen, Mitchell Parent, and Jonathan Zarley, pursuant to the Court's order requesting a status report of each Defendants' administrative posture in this case [ECF No. 200], hereby submits the following First Administrative Status Report:

Plaintiffs' Amended Complaint originally brought claims against forty-two Defendants. See ECF No. 64. The status for each Defendant is summarized as follows:

- Twenty-six Defendants have had Clerk's defaults entered against them and are the subject of Plaintiffs' pending Motion for Default Judgment (*see* Table 1: Defaulted Defendants);
- Five Defendants cannot be served with process, pursuant to the Court's Order, because Plaintiffs have been unable to confirm they are unaffected by the Ukraine war (*see* Table 2: Unserved Defendants);
- Two Defendants have not been served; Plaintiffs moved to serve them by publication, which motion is pending before the Magistrate Judge (*see* Table 2: Unserved Defendants);
- Seven Defendants are in settlement discussions with the Plaintiffs (*see* Table 3: Defendants with Pending Settlement); and
- Two Defendants have been dismissed (*see* Table 4: Dismissed Defendants).

Below, Plaintiffs created four Tables detailing the administrative posture for each individual Defendant:

**TABLE 1: DEFAULTED DEFENDANTS**

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
(1) Notus LLC	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(2) Shopostar LLC	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(3) Auro Advantages LLC <sup>1</sup>	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(4) Global E-Advantages LLC	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(5) Grovee LLC	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(6) Easy Com LLC <sup>2</sup>	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(7) Borys Konovalenko	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before

<sup>1</sup> Auro Advantages LLC was served with process via its registered agent Corporation Services Company [ECF No. 102 at Ex. 1]; however, subsequently, it appears Corporation Services Company has withdrawn as registered agent because it is no longer listed on the Delaware Secretary of State website and is refusing service of documents on the Defendant's behalf [see ECF No. 171]. Plaintiffs have been unable to locate another reliable address for the Defendant.

<sup>2</sup> New Hampshire Department of State business records have Easy Com LLC labelled as a business "not in good standing" because it has failed to file its annual report in 2022. Nevertheless, Registered Agents Inc. is still listed as the registered agent, and the Plaintiffs recommend that the Court send all correspondence to its address at 159 Main Street, S100, Nashua, NH 03060.

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
		Magistrate Judge Goodman [ECF No. 194].
(8) Mayon Holding Ltd.	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(9) Peter Mohlnyi	Clerk entered Default on May 27, 2022 [ECF No. 145].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(10) Dmytro Fokin	Clerk entered Default on May 31, 2022 [ECF No. 155].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(11) Olga Abrykosova	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(12) Art Sea Group Ltd	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(13) Brass Marker S.R.O.	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(14) Ester Holdings, Inc.	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(15) The Investing Online	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
(16) Ivan Hrechaniuk	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(17) Manuchar Daraselvia	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(18) Olga Tielly	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(19) Profit Media Group LP	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(20) Sergiy Prokopenko	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(21) Wealthy Developments LP	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(22) Marina Garda	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(23) Trans-Konsalt MR Ltd	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(24) VDD-Trading, Ltd	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
(25) Mayon Solutions Ltd	Clerk entered Default on May 31, 2022 [ECF No. 154].	Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].
(26) Mayon Solutions, LLC	Clerk entered Default on June 16, 2022 [ECF No. 168].	Plaintiffs moved for Default Judgment on July 15, 2022 [ECF No. 189] and a decision is pending before Magistrate Judge Goodman [ECF No. 194].

**TABLE 2: UNSERVED DEFENDANTS**

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
Pursuant to the Court's Order granting in part and denying in part Plaintiffs' Motion for Alternate Service [ECF No. 98], Plaintiffs cannot serve the following Defendants (potentially residing in Ukraine) until it can be shown that they "are either still active in the [requested] alternative channels or are otherwise unimpacted by the war"—Plaintiffs have thus far been unable to make the requisite showing.		
(27) Alex Doe	<i>See</i> Court's Order temporarily postponing alternate service of process. [ECF No. 98]	Pending service of process.
(28) Vsevolod Tovstun	<i>See</i> Court's Order temporarily postponing alternate service of process. [ECF No. 98]	Pending service of process.
(29) Daria Eckert	<i>See</i> Court's Order temporarily postponing alternate service of process. [ECF No. 98]	Pending service of process.
(30) Nataliya Los	<i>See</i> Court's Order temporarily postponing alternate service of process. [ECF No. 98]	Pending service of process.
(31) Anna Shymko	On April 21, 2022, attempted to serve at her most recently known home address, new homeowner told the process server that Shymko had moved back to Ukraine. <i>See</i> Court's Order temporarily postponing alternate service of process. [ECF No. 98]	Pending service of process.

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
The following Defendants have not yet been served, but Plaintiffs have filed a Motion for Alternate service asking the Court for leave to serve the Defendants by publication [ECF No. 186]:		
(32) Jase Victor Davis	Denied Plaintiffs' request to serve via alternate service because Plaintiffs never put forth arguments that they have complied with either Florida or New Hampshire laws allowing for service, or that either state permits Plaintiffs' proposed methods of alternate service. [ECF No. 98].	Plaintiffs filed an additional Motion to serve Davis by publication in a Mississippi newspaper of general circulation [ECF No. 186]—an approved method of service in the related CFTC action. <i>See CFTC v. Notus</i> , No. 22-cv-20291. The Court issued an Order referring this Motion to the Magistrate Judge, and an ultimate ruling is pending. <i>See</i> ECF No. 188.
(33) Anton Bilous	Granted Plaintiffs' request to serve via email, company website, and social media messages. [ECF No. 38].	Due to the Defendant's elusive tactics, the Plaintiffs have been unable to locate a reliable social media account or personal contact details, making the originally granted alternate means of service ineffective; consequently, Plaintiffs requested leave from the Court to serve Bilous via publication on the Plaintiffs website. <i>See</i> ECF No. 186. The Court issued an Order referring this Motion to the Magistrate Judge, and an ultimate ruling is pending. <i>See</i> ECF No. 188.

**TABLE 3: DEFENDANTS ENGAGED IN SETTLEMENT DISCUSSIONS**

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
(34) Jared Goodyear	Plaintiffs served Goodyear on March 18, 2022, and the process server's affidavit was filed with the Court. <i>See</i> ECF No. 102 at Ex. 5. On June 13, 2022, Goodyear filed a motion to dismiss [ECF No.	The parties have agreed on settlement terms and are producing finalized deliverables.

Defendant	Past Administration	Current Status
	166], which the Court has since held in abeyance to further the parties' settlement discussions [ECF No. 193].	
(35) Timothy Stubbs	Stubbs filed a motion to dismiss [ECF No. 116], which has been fully briefed [see ECF Nos. 132, 161]. The Court denied Stubbs' motion to dismiss as moot and requested that Plaintiffs file this status report. ECF No. 200.	The parties have agreed on settlement terms and are producing finalized deliverables.
(36) Alla Skala	Clerk entered Default on May 31, 2022 [ECF No. 154]. Plaintiffs moved for Default Judgment on June 27, 2022 [ECF No. 180], but the Court set aside the default at Skala's request [see ECF Nos. 177, 183]. On June 30, 2022, Skala filed a motion to dismiss [ECF No. 181], which was mooted by the Court in conjunction with this request for a status report [ECF No. 200].	The parties have reached a general agreement as to terms and are finalizing same.
(37) Boonruk Ruamkit Co., Ltd.	Court ordered the Clerk to enter default for failure to secure counsel. See ECF Nos. 133–36. The Defendant obtained counsel, moved to set aside the default, and filed a motion to dismiss. ECF Nos. 164–65, 169. Plaintiffs responded on August 4, 2022 [ECF No. 197], but the Court mooted the motion to dismiss in conjunction with this requests for a status report [ECF No. 200].	The parties have agreed on settlement terms and are producing finalized deliverables. On August 18, 2022, Defendant's counsel moved to withdraw as attorney [see ECF Nos. 202–203]; however, Plaintiffs are committed to work diligently with Defendants and any newly hired counsel to resolve this dispute expeditiously.
(38) IT Outsourcing Co., Ltd.	Court ordered the Clerk to enter default for failure to secure counsel. See ECF Nos. 133–36. The Defendant	The parties have agreed on settlement terms and are producing finalized deliverables. On August 18,

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
	obtained counsel, moved to set aside the default, and filed a motion to dismiss. ECF Nos. 164–65, 169. Plaintiffs responded on August 4, 2022 [ECF No. 197], but the Court mooted the motion to dismiss in conjunction with this requests for a status report [ECF No. 200].	2022, Defendant’s counsel moved to withdraw as attorney [see ECF Nos. 202–203]; however, Plaintiffs are committed to work diligently with Defendants and any newly hired counsel to resolve this dispute expeditiously.
(39) Nattpemol Krinara	The Defendant filed a motion to dismiss [ECF No. 169], which Plaintiffs responded in opposition to on August 4, 2022 [ECF No. 197]. Nevertheless, the Court mooted the motion to dismiss in conjunction with this requests for a status report [ECF No. 200].	The parties have agreed on settlement terms and are producing finalized deliverables. On August 18, 2022, Defendant’s counsel moved to withdraw as attorney [see ECF Nos. 202–203]; however, Plaintiffs are committed to work diligently with Defendants and any newly hired counsel to resolve this dispute expeditiously.
(40) Papahratsorn Raviratporn	The Defendant filed a motion to dismiss [ECF No. 169], which Plaintiffs responded in opposition to on August 4, 2022 [ECF No. 197]. Nevertheless, the Court mooted the motion to dismiss in conjunction with this requests for a status report [ECF No. 200].	The parties have agreed on settlement terms and are producing finalized deliverables. On August 18, 2022, Defendant’s counsel moved to withdraw as attorney [see ECF Nos. 202–203]; however, Plaintiffs are committed to work diligently with Defendants and any newly hired counsel to resolve this dispute expeditiously.

**TABLE 4: DISMISSED DEFENDANTS**

<b>Defendant</b>	<b>Past Administration</b>	<b>Current Status</b>
(41) ePayments Systems Ltd	Court granted Defendant’s motion to dismiss. ECF No. 140.	Clerk entered judgment for Defendant. ECF No. 141.



(42) Aware Choice Ltd	Plaintiffs filed notice of voluntary dismissal without prejudice. ECF No. 143.	Court dismissed Defendant. ECF No. 146.
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Dated: August 22, 2022.

Respectfully submitted,

/s/ Dennis A. González

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or about August 22, 2022, a true and accurate copy of PLAINTIFFS' FIRST ADMINISTRATIVE STATUS REPORT was served on counsel of record via the CM/ECF system. 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:

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

Respectfully submitted,

*/s/ Dennis A. González*

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