

**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.

PLAINTIFFS' SECOND 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 Second Administrative Status Report:

Plaintiffs' Amended Complaint originally brought claims against forty-two named 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;
- Five Defendants cannot be served with process because Plaintiffs have been unable to confirm they are unaffected by the Ukraine war and/or locate reliable contact information;
- Two Defendants have not been served because Plaintiffs have been unable to identify reliable contact information;
- Three Defendants are in settlement discussions with the Plaintiffs; and
- Six Defendants have been dismissed.

Below, Plaintiffs created tables detailing the administrative posture for each individual Defendant according to the Groups delineated by the Court (*see* ECF No. 200):

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
GROUP A DEFENDANTS						
Alex Doe	N/A	N/A	N/A	N/A	N/A	Defendant's identity remains unknown.
John Does 1-3	N/A	N/A	N/A	N/A	N/A	Defendants' identities remain unknown.
Peter Mohlnyi	4/19/2022 and 4/22/2022	DE 153, Ex. 1	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
GROUP B DEFENDANTS						
Ester Holdings, Inc.	4/22/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
The Investing Online	4/22/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
GROUP C DEFENDANTS						

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Vsevolod Tovstun	N/A	N/A	N/A	N/A	N/A	Ukrainian Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.
Borys Konovalenko	4/19/2022	DE 123	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Mayon Holding Ltd.	4/19/2022 and 4/22/2022	DE 153, Ex. 1	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Mayon Solutions, LLC	5/31/2022	DE 157	DE 168	N/A	N/A	Plaintiffs moved for Default Judgment on July 15, 2022 [DE 189].
Mayon Solutions Ltd	4/19/2022 and 4/22/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Marina Garda	4/19/2022	DE 153, Ex. 2	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Daria Eckert	N/A	N/A	N/A	N/A	N/A	Ukrainian Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.
Olga Tielly	4/19/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Anna Shymko	N/A	N/A	N/A	N/A	N/A	Ukrainian Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Timothy Stubbs	2/25/2022	DE 86	N/A	N/A	DE 87 & 89	Since Plaintiffs' First Status Report, the parties have finalized deliverables and are awaiting Plaintiffs' final approval.
GROUP D DEFENDANTS						
Wealthy Developments LP	4/19/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Anton Bilous	N/A	N/A	N/A	N/A	N/A	Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.
Aware Choice Ltd	N/A	N/A	N/A	N/A	N/A	Plaintiffs filed notice of voluntary dismissal without prejudice (DE 143), and the Court dismissed Defendant (DE 146).

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Ivan Hrechaniuk	4/27/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Profit Media Group LP	4/19/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
VDD-Trading, Ltd	4/19/2022	DE 153, Ex. 2	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Dmytro Fokin	4/19/2022	DE 153, Ex. 2	DE 155	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Manuchar Daraselia	4/27/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
GROUP E DEFENDANTS						

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Olga Abrykosova	4/22/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Auro Advantages LLC	3/23/2022	DE 102, Ex. 1	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Notus LLC	3/28/2022	DE 102, Ex. 6	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Alla Skala	4/18/2022 and 4/22/2022	DE 153, Ex. 1	DE 154, The Court set aside the Clerk's Default at Skala's request [see DE 177 & 183].	N/A	DE 176	The parties are working towards a settlement, and Defendant is preparing deliverables.
Shopostar LLC	3/28/2022	DE 102, Ex. 7	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Nataliya Los	N/A	N/A	N/A	N/A	N/A	Ukrainian Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.
Global E-Advantages LLC	3/23/2022	DE 102, Ex. 2	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Easy Com LLC	3/24/2022	DE 102, Ex. 4	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Jase Victor Davis	N/A	N/A	N/A	N/A	N/A	Defendant's whereabouts remain unknown, and Plaintiffs have been unable to discover reliable contact information.
Grovec LLC	3/23/2022	DE 102, Ex. 3	DE 145	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Jared Goodyear	03/24/2022	DE 102, Ex. 5	N/A	N/A	DE 110	The parties are working towards a settlement, and Defendant is preparing deliverables.
Brass Marker S.R.O.	4/27/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Sergiy Prokopenko	4/27/2022	DE 153, Ex. 1	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
Trans-Konsalt MR Ltd	4/19/2022	DE 153, Ex. 2	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
IT Outsourcing Co., Ltd.	4/19/2022 and 4/27/2022	DE 153, Ex. 1	DE 135	N/A	DE 158 & 159; <i>but see</i> Order granting their withdrawal (DE 205).	Court dismissed the Defendant with prejudice (DE 220) following Joint Stipulation for Dismissal (DE 218).

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Art Sea Group Ltd	4/19/2022	DE 153, Ex. 2	DE 154	N/A	N/A	Plaintiffs moved for Default Judgment on June 27, 2022 [DE 180].
GROUP F DEFENDANTS						
ePayments Systems Ltd	4/19/2022 and 4/22/2022	DE 153, Ex. 1	N/A	N/A	DE 47 & 49	Court granted Defendant's motion to dismiss (DE 140), and the Clerk entered judgment for Defendant (DE 141).
Boonruk Ruamkit Co., Ltd.	4/27/2022	DE 153, Ex. 1	DE 135	N/A	DE 158 & 159; <i>but see</i> Order granting their withdrawal (DE 205).	Court dismissed the Defendant with prejudice (DE 220) following Joint Stipulation for Dismissal (DE 218).
Nattpemol Krinara	4/19/2022 and 4/27/2022	DE 153, Ex. 1	N/A	N/A	DE 158 & 159; <i>but see</i> Order granting their withdrawal (DE 205).	Court dismissed the Defendant with prejudice (DE 220) following Joint Stipulation for Dismissal (DE 218).

DEFENDANT	DATE OF SERVICE	PROOF OF SERVICE	CLERK'S DEFAULT	EXPECTED DATE OF SERVICE	COUNSEL NOA	ADDITIONAL COMMENTS
Papahratsorn Raviratporn	4/19/2022 and 4/27/2022	DE 153, Ex. 1	N/A	N/A	DE 158 & 159; <i>but see</i> Order granting their withdrawal (DE 205).	Court dismissed the Defendant with prejudice (DE 220) following Joint Stipulation for Dismissal (DE 218).

Dated: September 21, 2022.

Respectfully submitted,

/s/ Dennis A. González

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or about September 21, 2022, a true and accurate copy of PLAINTIFFS' SECOND 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:

Art Sea Group Ltd. Via publication on Plaintiffs' website	Auro Advantages, LLC Via publication on Plaintiffs' website
Easy Com, LLC c/o Registered Agent 159 Main Street, Unit 100, Nashua, NH 03060	Marina Garda Via publication on Plaintiffs' website
Boonruk Ruamkit Co., Ltd. c/o Nattpemol Krinara & Evgenii Borisov Via email to nattpemol@hotmail.com and borisovevgeny@mail.ru	IT Outsourcing Co., Ltd. c/o Nattpemol Krinara & Evgenii Borisov Via email to nattpemol@hotmail.com and borisovevgeny@mail.ru
Global E-Advantages LLC c/o Registered Agent North West Registered Agent LLC 8 The Green, Suite B, Dover, DE 19901	Grovec, LLC c/o Registered Agent Delaware Business Incorporators 3422 Old Capitol Trail, Suite 700 Wilmington, DE 19808
Ivan Hrechaniuk Via publication on Plaintiffs' website	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
Papahratsorn Raviratporn c/o Nattpemol Krinara & Evgenii Borisov Via email to nattpemol@hotmail.com and borisovevgeny@mail.ru	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

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