

CLOSED,JG,REF\_DISCOV

**U.S. District Court  
Southern District of Florida (Miami)  
CIVIL DOCKET FOR CASE #: 1:14-cv-23208-JAL**

Flava Works, Inc. v. A4A Reseau, Inc. et al  
Assigned to: Judge Joan A. Lenard  
Referred to: Magistrate Judge Jonathan Goodman  
Cause: 17:0101 Copyright Infringement

Date Filed: 08/29/2014  
Date Terminated: 01/21/2015  
Jury Demand: Plaintiff  
Nature of Suit: 820 Copyright  
Jurisdiction: Federal Question

**Plaintiff**

**Flava Works, Inc.**

represented by **Joshua Howard Sheskin**  
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*TERMINATED: 10/05/2015*

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V.

**Defendant**

**A4A Reseau, Inc.**

represented by **John Francis Bradley**  
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**Defendant**

**A4A Network, Inc.**

represented by **John Francis Bradley**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Defendant**

**Marc Parent**

represented by **John Francis Bradley**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
08/29/2014	<u>1</u>	COMPLAINT against All Defendants. Filing fees \$ 400.00 receipt number 113C-7034774, filed by Flava Works, Inc.. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit Exhibit A-Plaintiff's Registered Copyrights, # <u>3</u> Exhibit Exhibit B-Defendant's Registered Service Mark, # <u>4</u> Exhibit Exhibit C-Images, # <u>5</u> Exhibit Exhibit D-Plaintiff's Takedown Notices, # <u>6</u> Certification)(Jackson, Ursula) (Entered: 08/29/2014)
08/29/2014	<u>2</u>	Judge Assignment to Judge Joan A. Lenard (vjk) (Entered: 09/02/2014)
08/29/2014	<u>3</u>	FORM AO 121 SENT TO DIRECTOR OF U.S. COPYRIGHT OFFICE (vjk) (Entered: 09/02/2014)
10/06/2014	<u>4</u>	NOTICE of Filing Proposed Summons(es) by Flava Works, Inc. (Jackson, Ursula) (Entered: 10/06/2014)
10/06/2014	<u>5</u>	NOTICE of Filing Proposed Summons(es) by Flava Works, Inc. (Jackson, Ursula) (Entered: 10/06/2014)
10/06/2014	<u>6</u>	NOTICE of Filing Proposed Summons(es) by Flava Works, Inc. (Jackson, Ursula) (Entered: 10/06/2014)
10/06/2014	<u>7</u>	Summons Issued as to A4A Reseau, Inc.. (cqs) (Entered: 10/06/2014)
10/06/2014	<u>8</u>	Summons Issued as to A4A Network, Inc.. (cqs) (Entered: 10/06/2014)
10/06/2014	<u>9</u>	NOTICE of Filing Proposed Summons(es) by Flava Works, Inc. (Jackson, Ursula) (Entered: 10/06/2014)
10/06/2014	<u>10</u>	Summons Issued as to Marc Parent, (cqs) (Entered: 10/06/2014)
11/06/2014	<u>11</u>	Defendant's MOTION TO DISMISS <u>1</u> Complaint, FOR FAILURE TO STATE A CLAIM , MOTION to Strike <u>1</u> Complaint, . MOTION for More Definite Statement by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. Attorney John Francis Bradley added to party A4A Network, Inc.(pty:dft), Attorney John Francis Bradley added to party A4A Reseau, Inc.(pty:dft), Attorney John Francis Bradley added to party Marc Parent(pty:dft). Responses due by 11/24/2014 (Bradley, John) (Entered: 11/06/2014)
11/19/2014	<u>12</u>	NOTICE of Compliance <i>Rule 7.1 Disclosure</i> by A4A Reseau, Inc., A4A Network, Inc., Marc Parent (Bradley, John) (Entered: 11/19/2014)

11/21/2014	<u>13</u>	Plaintiff's MOTION for Extension of Time to File Response/Reply by Flava Works, Inc.. (Attachments: # <u>1</u> Text of Proposed Order)(Jackson, Ursula) (Entered: 11/21/2014)
11/24/2014	<u>14</u>	ORDER GRANTING <u>13</u> Plaintiff's Motion for an Extension of Time in Which to Respond to Motion to Dismiss, Failure to State a Claim and Motion for More Definite Statement. Plaintiff shall have until and including January 2, 2014 to file a response. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 11/24/2014. (gie) (Entered: 11/24/2014)
12/31/2014	<u>15</u>	Motion For Extention of Time to Respond re <u>13</u> Plaintiff's MOTION for Extension of Time to File Response/Reply, <u>11</u> Defendant's MOTION TO DISMISS <u>1</u> Complaint, FOR FAILURE TO STATE A CLAIM MOTION to Strike <u>1</u> Complaint, MOTION for More Definite Statement filed by Flava Works, Inc.. (Attachments: # <u>1</u> Text of Proposed Order)(Jackson, Ursula)Relief and text Modified on 1/5/2015 (cqs). (Entered: 12/31/2014)
12/31/2014	<u>16</u>	Second MOTION for Extension of Time to File Response/Reply/Answer as to 14 Order on Motion for Extension of Time to File Response/Reply/Answer, <u>15</u> Response in Support of Motion, by Flava Works, Inc.. (Attachments: # <u>1</u> Text of Proposed Order)(Jackson, Ursula) (Entered: 12/31/2014)
01/05/2015	<u>17</u>	Clerks Notice to Filer re <u>15</u> Response in Support of Motion., <b>Wrong Event Selected – Document is a Motion</b> ; ERROR – The Filer selected the wrong event. A motion event must always be selected when filing a motion. The correction was made by the Clerk. It is not necessary to refile this document. (cqs) (Entered: 01/05/2015)
01/05/2015	<u>18</u>	ORDER GRANTING <u>16</u> Plaintiff's Motion for Extension of Time in Which to Respond to Defendant's Motion to Dismiss, Failure to State a Claim, and Motion for More Definite Statement. Plaintiff shall have until and including January 20, 2015 to file a Response. This entry constitutes the ENDORSED ORDER in its entirety. Responses due by 1/20/2015 Signed by Judge Joan A. Lenard on 1/5/2015. (gie) (Entered: 01/05/2015)
01/05/2015	<u>19</u>	ORDER DENYING AS MOOT <u>15</u> Plaintiff's Motion for an Extension of Time in Which to Respond to Motion to Dismiss, Failure to State a Claim and Motion for More Definite Statement in light of the Court's 18 Order on Plaintiff's Second Motion of the same title. (See D.E. <u>16</u> .) Signed by Judge Joan A. Lenard on 1/5/2015. (gie) (Entered: 01/05/2015)
01/16/2015	<u>20</u>	<i>Defendants' ANSWER and Affirmative Defenses to Complaint by A4A Network, Inc., A4A Reseau, Inc., Marc Parent.</i> (Bradley, John) (Entered: 01/16/2015)
01/16/2015	<u>21</u>	ORDER REGARDING FORMATTING OF FILINGS. The body of all filings shall be (1) double-spaced (with the exception of block quotations), and (2) printed in 12-point or larger type in an easily-readable font. Consistent with Local Rule 5.1, footnotes may be single-spaced but must be at least 12-point font. Furthermore, all filings are limited to forty-six (46) lines of footnoted material, which is equal to one full page of single-spaced, 12-point font text. All page limitations set forth by the Local Rules shall be observed. Non-compliant filings may be stricken from the record. All filings shall certify that the filing complies with the Local Rules and the Court's Orders. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 1/16/2015. (gie) (Entered: 01/16/2015)
01/20/2015	<u>22</u>	NOTICE of Voluntary Dismissal <i>Without Prejudice</i> by Flava Works, Inc. (Jackson, Ursula) (Entered: 01/20/2015)
01/21/2015	<u>23</u>	ORDER DISMISSING CASE WITHOUT PREJUDICE. On January 20, 2015, Plaintiff filed a <u>22</u> Notice of Voluntary Dismissal Without Prejudice, wherein it stated its intention to voluntarily dismiss this case without prejudice. Because Defendants have filed an answer <u>20</u> in this case and because the <u>22</u> Notice of Dismissal is not signed by all parties who have appeared, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the "action may be dismissed at the plaintiff's request only by court order." Accordingly, upon review of the <u>22</u> Notice, and pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, it is ORDERED AND ADJUDGED that: (1) this case is DISMISSED WITHOUT

		PREJUDICE; (2) all pending motions are DENIED AS MOOT; and (3) this case is now CLOSED. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 1/21/2015. (gie)
		<b>NOTICE: If there are sealed documents in this case, they may be unsealed after 1 year or as directed by Court Order, unless they have been designated to be permanently sealed. See Local Rule 5.4 and Administrative Order 2014-69.</b> (Entered: 01/21/2015)
02/04/2015	<u>24</u>	MOTION for Attorney Fees ( Responses due by 2/23/2015), MOTION to Reopen Case , MOTION to Set Aside 23 Order Dismissing Case,,,, <u>22</u> Notice of Voluntary Dismissal by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit)(Bradley, John). Added MOTION to Consolidate Cases on 2/4/2015 (cqs). (Entered: 02/04/2015)
02/24/2015	<u>25</u>	STRICKEN MOTION for Extension of Time to File Response/Reply/Answer as to <u>24</u> MOTION for Attorney Fees MOTION to Reopen Case MOTION to Set Aside 23 Order Dismissing Case,,,, <u>22</u> Notice of Voluntary Dismissal MOTION to Consolidate Cases by Flava Works, Inc..(Pro Se) (cqs) Modified on 2/25/2015 Stricken per de# 26 (dj). (Entered: 02/24/2015)
02/25/2015	<u>26</u>	ORDER STRIKING <u>25</u> Motion for Extension of Time to Respond. On August 29, 2014, Plaintiff filed a one-count <u>1</u> Complaint alleging copyright infringement by the three Defendants. On January 21, 2015, the Court entered an Order Dismissing this case without prejudice pursuant to Plaintiff's <u>22</u> Notice of Voluntary Dismissal Without Prejudice, filed January 20, 2015. (See D.E. 23.) Also on January 21, 2015, Plaintiff filed a virtually identical lawsuit against the same Defendants in the United States District Court for the Northern District of Illinois in Case No. 15-cv-00610. Also on January 21, 2015, A4A Reseau, Inc. and Marc Parent, who are Defendants in the instant Action, filed a Complaint for Declaratory Relief against Plaintiff Flava Works, Inc., and its principal, Phillip Bleicher. (See <u>A4A Reseau, Inc. v. Bleicher</u> , Case No. 15-cv-20245-COOKE (S.D. Fla. Jan. 21, 2015). On February 4, 2015, Defendants filed a <u>24</u> Motion to Set Aside Dismissal, to Reinstate Action, to Consolidate Actions, and to Award Attorneys' Fees. On February 24, 2015, Plaintiffs' principal, Phillip Bleicher, filed the instant Motion for Extension of Time to Respond, in which he states that Plaintiff relieved its former counsel, Ursula Jackson, on January 20, 2015—the same day it filed its Motion for Voluntary Dismissal—and has been unable to find replacement counsel to respond to Defendants' Motion. Because a corporation can only act through counsel, <u>Palazzo v. Gulf Oil Corp.</u> , 764 F.2d 1381, 1385 (11th Cir. 1985), it is ORDERED AND ADJUDGED that Plaintiff's Motion for Enlargement of Time is STRICKEN from the record.  It is FURTHER ORDERED AND ADJUDGED that Plaintiff shall have until and including March 4, 2015 to hire counsel and respond to Defendants' Motion to Set Aside Dismissal or SHOW CAUSE why the Court should not award Defendants attorneys' fees pursuant to Federal Rule of Civil Procedure 41(d)(1), which states: "If a plaintiff who previously dismissed an action in any court files an action based on or including the same claim against the same defendant, the court... may order the plaintiff to pay all or part of the costs of that previous action[.]" This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 2/25/2015. (gie) (Entered: 02/25/2015)
03/04/2015	<u>27</u>	NOTICE by A4A Network, Inc., A4A Reseau, Inc., Marc Parent re 26 Order on Motion for Extension of Time to File Response/Reply/Answer,,,,, of <i>Non-Compliance by Plaintiff with Endorsed Order and L.R. 3.8 S.D.F.L</i> (Attachments: # <u>1</u> Exhibit Exhibit 1) (Bradley, John) (Entered: 03/05/2015)
03/05/2015	<u>28</u>	ORDER GRANTING IN PART AND DENYING IN PART <u>24</u> Defendants' Motion to Set Aside Dismissal, to Reinstate Action, to Consolidate Actions, and to Award Attorneys' Fees ("Motion"). Defendants' <u>24</u> Motion is GRANTED solely to the extent it requests attorney's fees pursuant to Federal Rule of Civil Procedure 41(d), and DENIED to the extent it requests the Court to set aside dismissal, reinstate this action, and to consolidate the cases. Defendants shall have until and including March 16, 2015, to submit affidavits and supporting documentation to support its attorneys' fees request. This entry constitutes the ENDORSED ORDER

		in its entirety. Signed by Judge Joan A. Lenard on 3/5/2015. (gie) (Entered: 03/05/2015)
03/05/2015	<u>34</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Juneitha Shambee. Filing Fee \$ 75.00. Receipt # 96158. (ksa) (Entered: 03/06/2015)
03/06/2015	<u>29</u>	RESPONSE In Opposition To Motion To Set Aside, Reinstate Action and Attorney fees with attached Notice of Deficiency. by Flava Works, Inc.. (cqs) (Entered: 03/06/2015)
03/06/2015	<u>30</u>	NOTICE Of Filing by Flava Works, Inc. re <u>29</u> Response/Reply (Other) with attached deficiency notice.. Attorney Matthew Howard Zukowsky added to party Flava Works, Inc.(pty:pla). (cqs) (Entered: 03/06/2015)
03/06/2015	<u>31</u>	MOTION for Extension of Time to File Response by Flava Works, Inc.. (cqs) (Entered: 03/06/2015)
03/06/2015	<u>32</u>	NOTICE of Attorney Appearance by Matthew Howard Zukowsky on behalf of Flava Works, Inc. (cqs) (Entered: 03/06/2015)
03/06/2015	<u>33</u>	MOTION to Vacate 28 Order on Motion for Attorney Fees, Order on Motion to Reopen Case, Order on Motion to Set Aside, Order on Motion to Consolidate Cases,,,,,, by Flava Works, Inc.. Responses due by 3/23/2015 (cqs) (Entered: 03/06/2015)
03/06/2015	<u>35</u>	ORDER DENYING without prejudice <u>34</u> Motion to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing of Attorney Juneitha Shambee. Movant, Matthew H. Zukowsky, is not authorized to file through CM/ECF and did not sign the Motion with an original signature as required by the Local Rules and CM/ECF Administrative Procedures. Additionally, Attorney Juneitha Shambee did not attach a Certification that she has studied the Local Rules, as required by the Local Rules. Accordingly, the Motion is DENIED WITHOUT PREJUDICE. Notice of Termination delivered by US Mail to Juneitha Shambee. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 3/6/2015. (gie) (Entered: 03/06/2015)
03/06/2015	<u>36</u>	ORDER DENYING AS MOOT Plaintiff's <u>31</u> Motion for Extension of Time to Respond, and DENYING Plaintiff's <u>33</u> Motion to Vacate the Order Granting Defendant's Motion for Attorney's Fees. On January 20, 2015, Plaintiff filed a <u>22</u> Notice of Voluntary Dismissal Without Prejudice. The same day—before the Court had dismissed this case—Plaintiff relieved its Florida counsel, Ursula Jackson. (See D.E. <u>25</u> at para. 2.)  The next day—January 21, 2015—the Court entered an Order Dismissing this Case Without Prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure. (D.E. <u>23</u> .) The dismissal was entered pursuant to Rule 41(a)(2) because Plaintiff had already filed an Answer to the Complaint. (See D.E. <u>20</u> .) Also on January 21, 2015, Plaintiff re-filed its Action against Defendants in the Northern District of Illinois in case number 15-cv-00610. Thus, on February 4, 2015, Defendants filed a Motion in which they requested, inter alia, Attorneys' Fees pursuant to Rule 41(d), which states: "If a plaintiff who previously dismissed an action in any court files an action based on or including the same claim against the same defendant, the court... may order the plaintiff to pay all or part of the costs of that previous action[.]" On February 23, 2015, Plaintiff's owner and CEO, Phillip Bleicher, filed a <u>25</u> Motion for Extension of Time to Respond to Defendant's Motion, which the Court struck from the record on grounds that a corporation can act only through counsel. (See D.E. <u>26</u> (citing <i>Palazzo v. Gulf Oil Corp.</i> , 764 F.2d 1381, 1385 (11th Cir. 1985)). The Court granted Bleicher until March 4, 2015 to hire new counsel and to respond to Defendants' Motion for Attorneys' Fees or show cause why the Court should not award Defendants attorneys' fees. (See <i>id.</i> ) Due to Plaintiff's failure to timely respond or show cause why the Court should not award Defendants attorneys' fees, on March 5, 2015, the Court granted Plaintiff's Motion for Attorneys' Fees (but denied the motion in all other respects). Plaintiff's Motion for Extension of Time to Respond is therefore DENIED AS MOOT.

		On March 5, 2015, after the Court had entered its Order Granting Defendants' Motion for Attorneys' Fees, Plaintiff filed a <u>33</u> Motion to Vacate that Order pursuant to Rule 60(b), which permits a Court to relieve a party from a Court Order upon grounds including mistake, newly discovered evidence, and fraud. Rule 60(b) also contains a "catch-all" provision allowing reconsideration for "any other reason that justifies relief." Plaintiff appears to invoke this "catch-all" provision, arguing that it should be entitled to relief because: (1) it "has attempted profusely to retain an attorney," which it finally did on March 4, 2015, the day the Response was due; and (2) new counsel attempted to file a Response, but could not do so because he is not authorized to file through CM/ECF. The Court finds that Plaintiff has not satisfied the Rule 60(b) standard for relief from the Court's Order. "Rule 60(b)(6) is an extraordinary remedy[.]" <i>Ritter v. Smith</i> , 811 F.2d 1398, 1400 (11th Cir. 1987). Plaintiff had a full month between the date on which Defendants filed their Motion for Attorneys' Fees, February 4, 2015, and the extended deadline to file a Response, March 4, 2015, to secure an attorney who could timely file a Response. Plaintiff's alleged inability to secure an attorney within that period that could timely file a Response does not constitute an "extraordinary circumstances" entitling it to relief. Plaintiff's Motion to Vacate is therefore DENIED. This entry constitutes the ENDORSED ORDER in its entirety.  Signed by Judge Joan A. Lenard on 3/6/2015. (gie) (Entered: 03/06/2015)
03/10/2015	<u>37</u>	NOTICE Of Filing Certification of Juneitha Shambee, Esq by Flava Works, Inc. (cqs) (Entered: 03/10/2015)
03/10/2015	<u>38</u>	Clerk's Notice of Filing Deficiency Re: <u>37</u> Notice (Other) filed by Flava Works, Inc.. Document(s) missing required signature(s) (Fed.R.Civ.P. 11(a)). (cqs) (Entered: 03/10/2015)
03/16/2015	<u>39</u>	MOTION for Attorney Fees by A4A Network, Inc., A4A Rseau, Inc., Marc Parent. Responses due by 4/2/2015 (Attachments: # <u>1</u> Exhibit Ex A – Bellavance affidavit, # <u>2</u> Exhibit Ex B – Fattorosi Affidavit, # <u>3</u> Exhibit Ex C – Bradley Affidavit, # <u>4</u> Exhibit Ex D – Weiss Affidavit)(Bradley, John) (Entered: 03/16/2015)
03/31/2015	<u>40</u>	NOTICE of Change of Address by Matthew Howard Zukowsky (Zukowsky, Matthew) (Entered: 03/31/2015)
03/31/2015	<u>41</u>	NOTICE by Flava Works, Inc. <i>PLAINTIFFS MOTION AND INCORPORATED MEMORANDUM OF LAW IN RESPONSE TO DEFENDANTS MOTION TO DETERMINE REASONABLENESS OF ATTORNEYS FEES AWARDED TO DEFENDANTS</i> (Zukowsky, Matthew) (Entered: 03/31/2015)
03/31/2015	<u>42</u>	STRICKEN MOTION for Leave to File <i>PLAINTIFFS MOTION IN RESPONSE TO DEFENDANTS MOTION TO DETERMINE REASONABLENESS OF ATTORNEYS FEES AWARDED DEFENDANTS</i> by Flava Works, Inc.. (Attachments: # <u>1</u> Exhibit EXHIBIT A–DOCKET, # <u>2</u> Affidavit EXHIBIT B–AFFIDAVIT, # <u>3</u> Exhibit EXHIBIT C–DEFENDANTS MOTION, # <u>4</u> Affidavit)(Zukowsky, Matthew) Modified on 4/1/2015 stricken per de 43 (dj). (Entered: 03/31/2015)
03/31/2015	<u>43</u>	ORDER STRIKING without prejudice <u>42</u> Plaintiff's Motion for Leave to File Plaintiff's Motion in Response to Defendant's Motion to Determine Reasonableness of Attorneys' Fees ("Motion"). On January 16, 2015, the Court issued an Order Regarding Formatting of Filings that, inter alia, requires the body of all filings to be double-spaced. (See D.E. <u>21</u> .) Plaintiff's Motion is not double-spaced. Additionally, it is unclear why Plaintiff is filing a motion for permission to file a motion in response to Defendant's Motion, when it could simply file a Response to Defendant's Motion as a matter of right. See L.R. S.D. Fla. 7.1(c). In any event, it is ORDERED AND ADJUDGED that Plaintiff's Motion for Leave to File Plaintiff's Motion in Response to Defendant's Motion to Determine Reasonableness of Attorneys' Fees is STRICKEN without prejudice for failure to comply with the Court's January 16, 2015 Order. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 3/31/2015. (gie) (Entered: 03/31/2015)

04/07/2015	<u>44</u>	NOTICE by Flava Works, Inc. <i>PLAINTIFFS MEMORANDUM OF LAW IN RESPONSE TO DEFENDANTS MOTION TO DETERMINE REASONABLENESS OF ATTORNEYS FEES AWARDED TO DEFENDANTS</i> (Zukowsky, Matthew) (Entered: 04/07/2015)
04/07/2015	<u>45</u>	RESPONSE/REPLY <i>PLAINTIFFS MEMORANDUM OF LAW IN RESPONSE TO DEFENDANTS MOTION TO DETERMINE REASONABLENESS OF ATTORNEYS FEES AWARDED TO DEFENDANTS</i> by Flava Works, Inc.. (Attachments: # <u>1</u> Exhibit EXHIBIT A--DOCKET, # <u>2</u> Exhibit EXHIBIT B--AFFIDAVIT, # <u>3</u> Exhibit EXHIBIT C--DEFENDANTS MOTION, # <u>4</u> Exhibit EXHIBIT D--AFFIDAVIT)(Zukowsky, Matthew) (Entered: 04/07/2015)
04/07/2015	<u>46</u>	ORDER GRANTING <u>39</u> Defendants' Motion to Determine Reasonableness of Attorney's Fees Awarded to Defendants. Signed by Judge Joan A. Lenard on 4/7/2015. (gie) (Entered: 04/07/2015)
04/21/2015	<u>47</u>	(STRICKEN PER DE#49)NOTICE by A4A Network, Inc., A4A Reseau, Inc. re <u>46</u> Order on Motion for Attorney Fees <i>Execution</i> (Bradley, John) Modified on 4/22/2015 (cqs). (Entered: 04/21/2015)
04/21/2015	<u>48</u>	Clerks Notice to Filer re <u>47</u> Notice (Other). <b>Proposed Order Docketed as Main Document</b> ; CORRECTIVE ACTION REQUIRED – Filer must File a Notice of Striking, then resubmit the proposed order as instructed in the CM/ECF Administrative Procedures. Please see FLSD website for forms. (cqs) (Entered: 04/21/2015)
04/21/2015	<u>49</u>	NOTICE of Striking 48 Clerks Notice of Docket Correction and Instruction to Filer – Attorney <u>47</u> Notice (Other) filed by A4A Network, Inc., A4A Reseau, Inc. by A4A Reseau, Inc., Marc Parent, A4A Network, Inc. (Bradley, John) (Entered: 04/21/2015)
06/10/2015	<u>50</u>	WRIT of Execution issued signed by DEPUTY CLERK (cqs) (Entered: 06/10/2015)
06/19/2015	<u>51</u>	MOTION to Compel <i>Plaintiff/Judgment Debtor to Complete Form 1.977 (Fact Information Sheet)</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. Responses due by 7/9/2015 (Attachments: # <u>1</u> Exhibit "A")(Bradley, John) (Entered: 06/19/2015)
06/19/2015	<u>52</u>	THIS CAUSE is before the Court on Defendants' Motion to Compel Plaintiff/Judgment Debtor to Complete Fla. R. Civ. P. Form 1.977 – Fact Information Sheet ("Motion"). Therein, Defendant' indicates that it conferred with Plaintiff pursuant to Local Rule 7.1, and that Plaintiff objected to the relief requested in the Motion. Accordingly, it is ORDERED AND ADJUDGED that if Plaintiff wishes to oppose Defendant's <u>51</u> Motion it shall file a Response on or before June 26, 2015. The Response shall not exceed 5 double-spaced pages, excluding signature block and certificates. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 6/19/2015. (gie) (Entered: 06/19/2015)
06/23/2015	<u>53</u>	MOTION for Extension of Time to File Response/Reply/Answer <i>Defendants Motion to Compel Plaintiff/Judgment Debtor to Complete Fla. R. Civ. P. Form 1.977</i> by Flava Works, Inc.. (Zukowsky, Matthew) (Entered: 06/23/2015)
06/23/2015	<u>54</u>	ORDER GRANTING <u>53</u> Motion for Extension of Time to Respond. Plaintiff shall have until and including July 6, 2015, to file a response to Defendant's Motion to Compel Plaintiff/Judgment Debtor to Complete Fla. R. Civ. P. Form 1.977. However, the Parties are reminded that Local Rule 7.1(a)(3) requires a pre-filing conferral and a certificate attesting to the conferral (or explaining the efforts taken to have one). Although the motion does not contain the required certificate of conferral, the Court will nevertheless grant it. This entry constitutes the ENDORSED ORDER in its entirety. Responses due by 7/6/2015 Signed by Judge Joan A. Lenard on 6/23/2015. (gie) (Entered: 06/23/2015)
07/06/2015	<u>55</u>	NOTICE by Flava Works, Inc. <i>PLAINTIFFS RESPONSE IN OPPOSITION TO DEFENDANTS MOTION TO COMPEL PLAINTIFF/JUDGMENT DEBTOR TO COMPLETE FLA. R. CIV. P. FORM 1.977 FACT INFORMATION SHEET</i> (Zukowsky, Matthew) (Entered: 07/06/2015)

07/06/2015	<u>56</u>	RESPONSE in Opposition re <u>51</u> MOTION to Compel <i>Plaintiff/Judgment Debtor to Complete Form 1.977 (Fact Information Sheet)</i> filed by Flava Works, Inc.. Replies due by 7/16/2015. (Zukowsky, Matthew) (Entered: 07/06/2015)
07/14/2015	<u>57</u>	REPLY to Response to Motion re <u>51</u> MOTION to Compel <i>Plaintiff/Judgment Debtor to Complete Form 1.977 (Fact Information Sheet)</i> filed by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. (Bradley, John) (Entered: 07/14/2015)
07/20/2015	<u>58</u>	ORDER GRANTING <u>51</u> Defendant's Motion to Compel Plaintiff/Judgment Debtor to Complete Fla. R. Civ. P. Form 1.977 — Fact Information Sheet. Signed by Judge Joan A. Lenard on 7/20/2015. (gie) (Entered: 07/20/2015)
07/24/2015	<u>59</u>	NOTICE of Attorney Appearance by Joshua Howard Sheskin on behalf of Flava Works, Inc.. Attorney Joshua Howard Sheskin added to party Flava Works, Inc.(pty:pla). (Sheskin, Joshua) (Entered: 07/24/2015)
07/24/2015	<u>60</u>	MOTION to Compel <i>Discovery Response to Request for Production In Aid of Execution</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. Responses due by 8/10/2015 (Attachments: # <u>1</u> Exhibit "A" (Request to Produce))(Bradley, John) (Entered: 07/24/2015)
07/24/2015	<u>61</u>	MOTION to Enforce Judgment <i>Motion for Proceedings Supplementary</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. Responses due by 8/10/2015 (Attachments: # <u>1</u> Exhibit "A" (Judgment Lien Certificate), # <u>2</u> Exhibit "B" (Recorded Order), # <u>3</u> Exhibit "C" (Articles of Dissolution), # <u>4</u> Exhibit "D" (Affidavit of Phillip Bleicher), # <u>5</u> Exhibit "E" (Flava Works, Inc. in IL), # <u>6</u> Exhibit "F" (P. Bleicher's email), # <u>7</u> Exhibit "G" (Domains), # <u>8</u> Exhibit "H" (Affidavit of John Bradley))(Bradley, John) (Entered: 07/24/2015)
07/27/2015	<u>62</u>	ORDER REFERRING to Magistrate Judge Jonathan Goodman <u>60</u> Motion to Compel a Discovery Response to First Request for Production in Aid of Execution and <u>61</u> Motion for Proceedings Supplementary. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 7/27/2015. (gie) (Entered: 07/27/2015)
08/13/2015	<u>63</u>	RESPONSE in Opposition re <u>61</u> MOTION to Enforce Judgment <i>Motion for Proceedings Supplementary</i> , <u>24</u> MOTION for Attorney Fees MOTION to Reopen Case MOTION to Set Aside 23 Order Dismissing Case,,, <u>22</u> Notice of Voluntary Dismissal MOTION to Consolidate Cases, <u>39</u> MOTION for Attorney Fees, <u>60</u> MOTION to Compel <i>Discovery Response to Request for Production In Aid of Execution</i> , <u>33</u> MOTION to Vacate 28 Order on Motion for Attorney Fees, Order on Motion to Reopen Case, Order on Motion to Set Aside, Order on Motion to Consolidate Cases,,,,,, <i>Response and Rule 60 Motion</i> filed by Flava Works, Inc.. Replies due by 8/24/2015. (Attachments: # <u>1</u> Exhibit Defendants Declaratory Action & Current Action)(Sheskin, Joshua) (Entered: 08/13/2015)
08/13/2015	<u>64</u>	RESPONSE in Opposition re <u>61</u> MOTION to Enforce Judgment <i>Motion for Proceedings Supplementary</i> , <u>60</u> MOTION to Compel <i>Discovery Response to Request for Production In Aid of Execution Motion in Opposition to Discovery</i> filed by Flava Works, Inc.. Replies due by 8/24/2015. (Sheskin, Joshua) (Entered: 08/13/2015)
08/24/2015	<u>65</u>	REPLY to Response to Motion re <u>60</u> MOTION to Compel <i>Discovery Response to Request for Production In Aid of Execution</i> filed by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. (Attachments: # <u>1</u> Exhibit "A", # <u>2</u> Exhibit "B")(Bradley, John) (Entered: 08/24/2015)
08/24/2015	<u>66</u>	REPLY to Response to Motion re <u>61</u> MOTION to Enforce Judgment <i>Motion for Proceedings Supplementary and 63 Motion In Opposition of Proceedings Supplementary</i> filed by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. (Bradley, John) (Entered: 08/24/2015)
08/28/2015	<u>67</u>	RESPONSE/REPLY to <u>63</u> Response in Opposition to Motion,,, <i>Response in Opposition to Motion for Reconsideration of the Award of Attorneys' Fees</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. (Bradley, John) (Entered: 08/28/2015)

09/02/2015	<u>68</u>	ORDER re Discovery Procedures. From this point forward (excepting already-filed motions), all discovery disputes shall follow the attached updated discovery procedures order. Signed by Magistrate Judge Jonathan Goodman on 9/2/2015. (tr00) (Entered: 09/02/2015)
09/02/2015	<u>69</u>	SUPPLEMENT to <u>67</u> Response/Reply (Other), <u>63</u> Response in Opposition to Motion,,, <i>REQUEST FOR JUDICIAL NOTICE</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent (Attachments: # <u>1</u> Exhibit "A" (Order Staying Case", # <u>2</u> Exhibit "B" (Endorsed Order Administratively Closing Case))(Bradley, John) (Entered: 09/02/2015)
09/02/2015	<u>70</u>	NOTICE of Compliance <i>PLAINTIFF'S NON-COMPLIANCE WITH S.D. FLA. L.R. 7.1(a)(3) AND ORDER [DE-54]</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent re <u>63</u> Response in Opposition to Motion,,, filed by Flava Works, Inc. (Bradley, John) (Entered: 09/02/2015)
09/02/2015	<u>71</u>	NOTICE of Compliance <i>With Order to Fill Out Form 1.977</i> by Flava Works, Inc. re <u>58</u> Order on Motion to Compel (Attachments: # <u>1</u> Exhibit Proof of Timely Mailing, # <u>2</u> Exhibit Proof of Timely Mailing, # <u>3</u> Exhibit Attached Documents, # <u>4</u> Exhibit Attached Documents) (Sheskin, Joshua) (Entered: 09/02/2015)
09/04/2015	<u>72</u>	ORDER Referring Case for Discovery Matters to Magistrate Judge Jonathan Goodman. Signed by Judge Joan A. Lenard on 09/04/15. (dp) (Entered: 09/04/2015)
09/04/2015	<u>73</u>	Request for Judicial Notice/SUPPLEMENT to <u>58</u> Order on Motion to Compel, <u>71</u> Notice of Compliance, <i>REQUEST FOR JUDICIAL NOTICE</i> by A4A Network, Inc., A4A Reseau, Inc., Marc Parent (Attachments: # <u>1</u> Exhibit "A" (Flava's letter to Fifth Third Bank), # <u>2</u> Exhibit "B" (USPS tracking of letter to PNC Bank), # <u>3</u> Exhibit "C" (USPS tracking of letter to TD Bank), # <u>4</u> Exhibit "D" (USPS tracking of letter to Fifth Third Bank))(Bradley, John)Event and Text Modified on 9/8/2015 (cqs). (Entered: 09/04/2015)
09/09/2015	<u>74</u>	NOTICE of Compliance <i>/Request for Judicial Notice</i> by Flava Works, Inc. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B) (Sheskin, Joshua) (Entered: 09/09/2015)
09/09/2015	<u>75</u>	NOTICE of Filing Discovery: Supplement to Notice of Compliance DE 71, and In Opposition to DE 73 by Flava Works, Inc.. (Attachments: # <u>1</u> Affidavit Affidavit of Paul Duval)(Sheskin, Joshua) (Entered: 09/09/2015)
10/02/2015	<u>76</u>	MOTION to Withdraw as Attorney by Matthew H. Zukowsky, by Flava Works, Inc., Responses due by 10/19/2015 (Attachments: # <u>1</u> Proposed Order)(Zukowsky, Matthew) (Entered: 10/02/2015)
10/05/2015	<u>77</u>	ORDER GRANTING <u>76</u> Motion to Withdraw as Counsel for Plaintiff, Flava Works, Inc. Attorney Matthew H. Zukowsky and his firm, Matthew H. Zukowsky, P.A. are hereby relieved of any further responsibility in this matter. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 10/5/2015. (gie) (Entered: 10/05/2015)
10/08/2015	<u>78</u>	First MOTION to Withdraw as Attorney <i>For Flava Works, Inc.</i> , by Joshua H. Sheskin, by Flava Works, Inc., Responses due by 10/26/2015 (Sheskin, Joshua) (Entered: 10/08/2015)
10/09/2015	<u>79</u>	UNSTIPULATED Joint MOTION for Substitution of Counsel by Flava Works, Inc.. Attorney Michael Gulisano added to party Flava Works, Inc.(pty:pla). Responses due by 10/26/2015 (Attachments: # <u>1</u> Text of Proposed Order)(Gulisano, Michael) (Entered: 10/09/2015)
10/09/2015	<u>80</u>	ORDER GRANTING <u>79</u> Joint Motion for Substitution of Plaintiff's Counsel. Michael Gulisano is hereby substituted as counsel of record for Plaintiff, Flava Works, Inc., in place of Joshua Howard Sheskin, Esquire, who is relieved of any further responsibility in this matter. Attorney Sheskin's <u>78</u> Motion to Withdraw as Counsel is therefore DENIED AS MOOT. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 10/9/2015. (gie) (Entered: 10/09/2015)

10/19/2015	<u>81</u>	ENDORSED ORDER setting Telephonic Scheduling Conference Re: Discovery Matters for 10/19/2015 at 04:00 PM in the Miami Division before Magistrate Judge Jonathan Goodman. This hearing is being held solely for the purpose of <b>scheduling</b> a discovery hearing because of defense counsel's representation that his office has contacted opposing counsel several times to confer about setting a discovery hearing on specific dates, but has not received a direct response as to plaintiff's counsel's availability. The hearing will not address the substance of the parties' discovery disputes, only the issue of scheduling. The parties shall abide by the following call-in procedure: (1) dial 1-888-684-8852; (2) enter Access Code Number 8004594, followed by the # sign; and (3) enter Security Code Number 1213, followed by the # sign. No cellular telephone use is permitted. All counsel shall have their calendars available so that the Court can pinpoint a specific hearing date workable to all counsel and the Court. Signed by Magistrate Judge Jonathan Goodman on 10/19/2015. (tr00) (Entered: 10/19/2015)
10/19/2015	<u>82</u>	Paperless Minute Entry for proceedings held before Magistrate Judge Jonathan Goodman: Telephone Conference held on 10/19/2015. (Digital 16:00:39.) (mso) (Entered: 10/19/2015)
10/20/2015	<u>83</u>	NOTICE of Hearing by ATTORNEY: Discovery Hearing set for 11/20/2015 04:30 PM in Miami Division before Magistrate Judge Jonathan Goodman. (Bradley, John) (Entered: 10/20/2015)
10/21/2015	<u>84</u>	(STRICKEN PER DE # 86)NOTICE by Flava Works, Inc. re <u>83</u> Notice of Hearing by Attorney of <i>filing Correspondence Regarding Hearing</i> (Gulisano, Michael)Text Modified on 10/21/2015 (cqs). (Entered: 10/21/2015)
10/21/2015	<u>85</u>	Clerks Notice to Filer re <u>84</u> Notice (Other). <b>Document Not Captioned; CORRECTIVE ACTION REQUIRED</b> - The Filer must File a Notice of Striking, then refile the document with the proper caption pursuant to Local Rules. (cqs) (Entered: 10/21/2015)
10/21/2015	<u>86</u>	NOTICE of Striking <u>84</u> Notice (Other) filed by Flava Works, Inc. by Flava Works, Inc. (Gulisano, Michael) (Entered: 10/21/2015)
10/21/2015	<u>87</u>	(STRICKEN PER ORDER DE # 88)NOTICE by Flava Works, Inc. re <u>83</u> Notice of Hearing by Attorney of <i>Filing Correspondence Regarding Hearing</i> (Attachments: # <u>1</u> Exhibit) (Gulisano, Michael) Text Modified on 10/22/2015 (cqs). (Entered: 10/21/2015)
10/21/2015	<u>88</u>	ENDORSED ORDER STRIKING <u>87</u> Notice (Other) filed by Flava Works, Inc. The Discovery Procedures [ECF No. <u>68</u> ] in this matter require that source materials for discovery hearings be delivered via handdelivery or through a document that is emailed to the CM/ECF mailbox (goodman@flsd.uscourts.gov), <b>not</b> through filings on the docket. Signed by Magistrate Judge Jonathan Goodman on 10/21/2015. (tr00) (Entered: 10/21/2015)
10/23/2015	<u>89</u>	ENDORSED ORDER re email from Plaintiff's counsel sent to the Court's e-file inbox on October 23, 2015. On October 20, 2015, Defendant noticed a Discovery Hearing to be held before the Undersigned on November 20, 2015. [ECF No. <u>83</u> ]. On October 21, 2015, Plaintiff filed a Notice of Filing [ECF No. <u>87</u> ] consisting of correspondence between the parties concerning the issues in dispute for the Discovery Hearing, which was stricken [ECF No. 88 ] by the Undersigned for failure to comply with the Discovery Procedures Order, requiring source material to be emailed to the Chambers' e-file inbox, not filed on the docket. On October 23, 2015, Plaintiff's counsel emailed the Chambers' e-file inbox, copying all other counsel, stating that certain subpoenas had been issued (and attaching the subpoenas) that would obviate the need for a hearing. If, indeed, these subpoenas moot the need for a hearing, then Plaintiff's counsel should confer with opposing counsel who set the hearing, and then opposing counsel, if satisfied, may cancel the hearing (and/or withdraw the pending discovery motion) with an official, on-the-record filing, or, if not satisfied fully, may file an amended notice of hearing that indicates certain issues (but not all) have been resolved. If Plaintiff's counsel is merely providing additional source material for the hearing, then submission of these to the e-file inbox is fine. The Court will not, however, cancel a hearing because one party states in an email to chambers that certain subpoenas resolve the disputed discovery issues. Such an action must be done with an official

		filing on the record. Signed by Magistrate Judge Jonathan Goodman on 10/23/2015. (tr00) (Entered: 10/23/2015)
11/19/2015	<u>90</u>	NOTICE of Hearing by ATTORNEY: Discovery Hearing set for 11/20/2015 04:30 PM in Miami Division before Magistrate Judge Jonathan Goodman. Motion Hearing set for 11/20/2015 04:30 PM in Miami Division before Magistrate Judge Jonathan Goodman. (Bradley, John) (Entered: 11/19/2015)
11/19/2015	<u>91</u>	MOTION to Withdraw as Attorney by Michael Gulisano. by Flava Works, Inc.. Responses due by 12/7/2015 (Gulisano, Michael) (Entered: 11/19/2015)
11/20/2015	<u>92</u>	ORDER DENYING WITHOUT PREJUDICE <u>91</u> Motion to Withdraw as Plaintiff's Counsel. As a corporate entity, Plaintiff Flava Works, Inc. is prohibited from proceeding without counsel. See <i>Palazzo v. Gulf Oil Corp.</i> , 764 F.2d 1381, 1385 (11th Cir. 1985). Because a corporation cannot appear <i>pro se</i> , but can only act through agents, <i>id.</i> , it is ORDERED AND ADJUDGED that Plaintiff's <u>91</u> Motion to Withdraw as Plaintiff's Counsel is DENIED WITHOUT PREJUDICE. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 11/20/2015. (gie) (Entered: 11/20/2015)
11/20/2015	<u>93</u>	Paperless Minute Entry for proceedings held before Magistrate Judge Jonathan Goodman: Discovery Hearing held on 11/20/2015. (Digital 16:05:14.) (mso) (Entered: 11/20/2015)
11/23/2015	<u>94</u>	POST-DISCOVERY HEARING ADMINISTRATIVE ORDER. Signed by Magistrate Judge Jonathan Goodman on 11/23/2015. (tr00) (Entered: 11/23/2015)
11/24/2015		Set Deadlines Per DE#94. See Order For Details. Miscellaneous Deadline 11/30/2015. (cqs) (Entered: 11/24/2015)
12/11/2015	<u>95</u>	NOTICE by A4A Network, Inc., A4A Reseau, Inc., Marc Parent re <u>94</u> Order of <i>Non-Compliance</i> (Bradley, John) (Entered: 12/11/2015)
12/11/2015		Attorney Juneitha Shambee representing Flava Works, Inc. (Plaintiff) Activated. (Shambee, Juneitha) (Entered: 12/11/2015)
12/11/2015	<u>96</u>	(STRICKEN PER DE# 97)Plaintiff's MOTION for Extension of Time To Pay Rule 37 Fee by Flava Works, Inc.. Responses due by 12/31/2015 (Attachments: # <u>1</u> Text of Proposed Order)(Shambee, Juneitha) Text Modified on 12/14/2015 (cqs). (Entered: 12/11/2015)
12/14/2015	<u>97</u>	ENDORSED ORDER striking <u>96</u> Motion for Extension of Time for failure to comply with Local Rule 7.1's requirement that counsel "make <b>reasonable effort</b> to confer" before filing a motion. (emphasis added). Counsel's attempted conferral — sending a single email to opposing counsel on a Saturday afternoon and not receiving a response within eight hours — does not constitute a "reasonable effort." Signed by Judge Joan A. Lenard on 12/14/2015. (tr00) (Entered: 12/14/2015)
12/15/2015	<u>98</u>	ORDER DENYING <u>63</u> Motion for Reconsideration of the Award of Attorneys' Fees. On January 21, 2015, the Court entered an Order Dismissing this Case Without Prejudice pursuant to Federal Rule of Civil Procedure 41(a)(2) upon Plaintiff's Notice of Voluntary Dismissal. The same day, Plaintiff re-filed its Action against Defendants in the Northern District of Illinois in case number 15-cv-00610. On April 7, 2015, the Court entered an Order granting Defendants \$28,060.57 in attorneys fees pursuant to Rule 41(d), which states: "If a plaintiff who previously dismissed an action in any court files an action based on or including the same claim against the same defendant, the court... may order the plaintiff to pay all or part of the costs of that previous action[.]" Plaintiff now seeks reconsideration under Rule 60(b) of the attorneys' fee award. (D.E. <u>63</u> ) Rule 60(b) allows for reconsideration upon grounds including mistake, newly discovered evidence, and fraud. Fed. R. Civ. P. 60(b). Rule 60(b) also contains a "catch-all" provision allowing reconsideration for "any other reason that justifies relief." Fed. R. Civ. P. 60(b)(6). The Eleventh Circuit has stated that relief under Rule 60(b)(6) "is an extraordinary remedy which may be invoked only upon a showing of exceptional circumstances." <i>Griffin v. Swim-Tech Corp.</i> , 722 F.2d 677, 680 (11th Cir. 1984) (citing <i>Ackermann v. United States</i> , 340 U.S. 193, 202 (1950)). "The

		party seeking relief has the burden of showing that absent such relief, an 'extreme' and 'unexpected' hardship will result." <i>Id.</i> (citing <i>United States v. Swift &amp; Co.</i> , 286 U.S. 106, 119 (1932)). Plaintiff has not established that he is entitled to relief from the Court's April 7, 2015, Order. Plaintiff's <u>63</u> Motion for Reconsideration of the Award of Attorneys' Fees is DENIED. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 12/15/2015. (gie) (Entered: 12/15/2015)
12/15/2015	<u>99</u>	NOTICE by Flava Works, Inc. <i>NOTICE OF ATTORNEYS CHARGING LIEN</i> (Gulisano, Michael) (Entered: 12/15/2015)
12/16/2015	<u>100</u>	MOTION to Alter Judgment by A4A Network, Inc., A4A Reseau, Inc., Marc Parent. Responses due by 1/4/2016 (Bradley, John) (Entered: 12/16/2015)
12/17/2015	<u>101</u>	Second MOTION for Extension of Time to Pay Rule 37 Fees by Flava Works, Inc.. Responses due by 1/4/2016 (Shambee, Juneitha) (Entered: 12/17/2015)
12/17/2015	<u>102</u>	ENDORSED ORDER denying Plaintiff's <u>101</u> Second Motion for Extension of Time to Pay Rule 37 Fees because the Motion (1) is untimely, (2) does not offer legal support for the requested enlargement, and (3) does not explain why Plaintiff would be in a better position to pay the money on January 31, 2016. Signed by Magistrate Judge Jonathan Goodman on 12/17/2015. (tr00) (Entered: 12/17/2015)
12/21/2015	<u>103</u>	ENDORSED ORDER setting Telephonic Status Conference Re: Discovery Matters for 12/22/2015 at 06:00 PM in the Miami Division before Magistrate Judge Jonathan Goodman. This hearing is being held solely for the purpose of <b>scheduling</b> a discovery hearing because of defense counsel's representation that his office has contacted opposing counsel several times to confer about setting a discovery hearing (related to Plaintiff's alleged non-compliance with a Post-Discovery Hearing Order) on specific dates (that range from December through the end of January), but Plaintiff's counsel purports to be unavailable for every single one. For the hearing, Plaintiff's counsel shall have a precise list of every purported conflict with the Court's available discovery hearing dates (specifically, the conflicts alleged for 12/30/2015, 12/31/2015, 1/8/2016, 1/15/2016, 1/22/2016 and 1/29/2016). The hearing will not address the substance of the parties' discovery dispute, only the issue of scheduling. The parties shall abide by the following call-in procedure: (1) dial 1-888-684-8852; (2) enter Access Code Number 8004594, followed by the # sign; and (3) enter Security Code Number 1213, followed by the # sign. No cellular telephone use is permitted. All counsel shall have their calendars available so that the Court can pinpoint a specific hearing date workable to all counsel and the Court. Signed by Magistrate Judge Jonathan Goodman on 12/21/2015. (tr00) (Entered: 12/21/2015)
12/22/2015	<u>104</u>	Paperless Minute Entry for proceedings held before Magistrate Judge Jonathan Goodman: Telephonic Status Conference held on 12/22/2015. Juneitha Shambee for the Plaintiff. John Francis Bradley for the Defendant. (Digital 18:02:32 - 18:13:36.) (wc) (Entered: 12/23/2015)
12/24/2015	<u>105</u>	NOTICE of Hearing by ATTORNEY: Discovery Hearing set for 2/5/2016 10:00 AM in Miami Division before Magistrate Judge Jonathan Goodman. (Bradley, John) (Entered: 12/24/2015)
01/06/2016	<u>106</u>	ORDER DENYING <u>100</u> Defendants/Judgment Creditors' Motion to Amend Judgment Pursuant to Fed. R. Civ. P. 59(e). Signed by Judge Joan A. Lenard on 1/6/2016. (gie) (Entered: 01/06/2016)
01/07/2016	<u>107</u>	Notification of Ninety Days Expiring by A4A Network, Inc., A4A Reseau, Inc., Marc Parent re <u>61</u> MOTION to Enforce Judgment <i>Motion for Proceedings Supplementary</i> filed by A4A Network, Inc., A4A Reseau, Inc., Marc Parent, <u>63</u> Response in Opposition to Motion..., filed by Flava Works, Inc., <u>66</u> Reply to Response to Motion, filed by A4A Network, Inc., A4A Reseau, Inc., Marc Parent (Bradley, John) (Entered: 01/07/2016)
02/02/2016	<u>108</u>	MOTION to Strike or Remove <i>Attorney of Record</i> by Flava Works, Inc.. Responses due by 2/19/2016 (Attachments: # <u>1</u> Affidavit)(Shambee, Juneitha) (Entered: 02/02/2016)

02/04/2016	<u>109</u>	NOTICE of Hearing by ATTORNEY: Discovery Hearing set for 2/5/2016 10:00 AM in Miami Division before Magistrate Judge Jonathan Goodman. (Bradley, John) (Entered: 02/04/2016)
02/05/2016	110	Paperless Minute Entry for proceedings held before Magistrate Judge Jonathan Goodman: Discovery Hearing held on 2/5/2016. (mso) (Entered: 02/05/2016)
02/08/2016	<u>111</u>	SECOND POST-DISCOVERY HEARING ORDER. Signed by Magistrate Judge Jonathan Goodman on 2/8/2016. (tr00) (Entered: 02/08/2016)
02/08/2016	<u>112</u>	ORDER granting <u>61</u> Motion for Proceedings Supplementary. Signed by Magistrate Judge Jonathan Goodman on 2/8/2016. (tr00) (Entered: 02/08/2016)
02/08/2016		Set Deadlines Per DE#111. Miscellaneous Deadline 2/12/2016. (cqs) (Entered: 02/08/2016)
02/09/2016	<u>113</u>	RESPONSE to Motion re <u>108</u> MOTION to Strike <i>or Remove Attorney of Record</i> filed by Flava Works, Inc.. Replies due by 2/19/2016. (Gulisano, Michael) (Entered: 02/09/2016)
02/13/2016	<u>114</u>	NOTICE by Flava Works, Inc. <i>Notice of Service of Affidavit</i> (Attachments: # <u>1</u> Affidavit) (Shambee, Juneitha) (Entered: 02/13/2016)
02/22/2016	115	ORDER GRANTING IN PART AND DENYING IN PART <u>108</u> Motion to Remove Attorney. Plaintiff seeks to remove its former attorneys Ursula Jackson and Michael Gulisano from the Notice List in this case. Ms. Jackson filed no response to Plaintiff's Motion, and its request to remove her as attorney of record is granted. Mr. Gulisano did file a Response <u>113</u> and wishes to remain on the Notice List as he has an outstanding charging lien against Plaintiff. (See D.E. <u>99</u> .) Mr. Gulisano alleges that Plaintiff has refused to pay him for \$1,000 in services rendered, refused Mr. Gulisano's offer to settle for \$500, and instead "attempted to blackmail [Mr. Gulisano] by threatening to make false and defamatory allegations to the Florida Bar unless [Mr. Gulisano] paid the Plaintiff \$7,500." (Resp. para. 9.) Thus, Mr. Gulisano wishes to remain on the Notice List "in order to monitor the docket and when appropriate enforce his lien." (Id. para. 10.) Plaintiff did not file a reply. Accordingly, upon review of the Motion, Response, and the record, it is ORDERED AND ADJUDGED that Plaintiff's <u>108</u> Motion to Remove Attorney is GRANTED with respect to Attorney Ursula Jackson, but DENIED with respect to Attorney Michael Gulisano. The Clerk shall remove Attorney Ursula Jackson from the Notice List, but shall not remove attorney Michael Gulisano from the Notice List. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 2/22/2016. (gie) (Entered: 02/22/2016)
02/22/2016		Attorney Ursula Christie Jackson terminated Per DE#115. (cqs) (Entered: 02/22/2016)
03/10/2016	<u>116</u>	MOTION for Reconsideration re 115 Order on Motion to Strike,,,,, by Flava Works, Inc.. (Attachments: # <u>1</u> Affidavit)(Shambee, Juneitha) (Entered: 03/10/2016)
03/11/2016	<u>117</u>	(STRICKEN PER DE # 122)RESPONSE in Opposition re <u>116</u> MOTION for Reconsideration re 115 Order on Motion to Strike,,,,, and <i>Request for Sanctions</i> filed by Flava Works, Inc.. Replies due by 3/21/2016. (Attachments: # <u>1</u> Exhibit Black Mail, # <u>2</u> Exhibit Example of Bleicher's Forged Evidence, # <u>3</u> Exhibit Example of Bleicher's Fraud)(Gulisano, Michael)Text Modified on 3/14/2016 (cqs). (Entered: 03/11/2016)
03/11/2016	118	(STRICKEN PER DE#122) MOTION for Sanctions (for image see DE#117.) by Flava Works, Inc.. (cqs)Text Modified on 3/11/2016 (cqs).Text Modified on 3/14/2016 (cqs). (Entered: 03/11/2016)
03/11/2016	119	Clerks Notice to Filer re <u>117</u> Response in Opposition to Motion, <b>Two or More Document Events Filed as One</b> ; ERROR - Only one event was selected by the Filer but more than one event was applicable to the document filed. The docket entry was corrected by the Clerk. It is not necessary to refile this document but in the future, the Filer must select all applicable events. (cqs) (Entered: 03/11/2016)

03/11/2016	<u>120</u>	MOTION to Amend/Correct <u>116</u> MOTION for Reconsideration re 115 Order on Motion to Strike,,,,, by Flava Works, Inc.. Responses due by 3/28/2016 (Attachments: # <u>1</u> Exhibit Amended Motion to Reconsider, # <u>2</u> Affidavit Phillip Bleicher)(Shambee, Juneitha) (Entered: 03/11/2016)
03/11/2016	121	ORDER DENYING <u>116</u> Plaintiff's Motion to Reconsider this Court's Partial Denial on Plaintiff's Motion to Strike Attorney, DENYING AS MOOT <u>120</u> Plaintiff's Motion for Leave to Amend, and REFERRING to Magistrate Judge Jonathan Goodman Attorney Michael Gulisano's <u>117</u> Motion for Sanctions (see D.E. 118). On February 22, 2016, the Court entered an Order which, inter alia, denied Plaintiff's <u>108</u> Motion to Remove its former Attorney, Michael Gulisano, from the Notice List in this case. (D.E. 115.) Mr. Gulisano stated in his <u>113</u> Response to that Motion that he had an outstanding charging lien against Plaintiff and wished to remain on the Notice List "in order to monitor the docket and when appropriate enforce his lien." Plaintiff did not file a Reply, and the Court denied its request to remove Mr. Gulisano from the Notice List. (D.E. 115.) On March 10, 2016, Plaintiff filed the instant <u>116</u> Motion for Reconsideration on the grounds that the Court's February 22, 2016 Order was based upon "a clear error of fact." Plaintiff appears to argue that the Court erred by finding that Plaintiff <i>in fact</i> owed Mr. Gulisano the money at issue in the charging lien. (D.E. <u>116</u> at 3.) However, the Court made no such finding and therefore the Court's Order was not based upon a clear error of fact. The Court also notes that instant Motion violates at least two of the local rules. First, it violates Local Rule 5.1(a)(4) &(b), which requires electronic filings to contain one-inch margins at the top, bottom, and each side. S.D. Fla. L.R. 5.1(a)(4) &(b). Second, it violates Local Rule 7.1(a)(3), which requires a pre-filing conferral and a certificate attesting to the conferral (or explaining the efforts taken to have one). S.D. Fla. L.R. 7.1(a)(3). In any event, having considered the Motion, Response, and the record, the Court finds that Plaintiff has not established that it is entitled to reconsideration under Federal Rules of Civil Procedure 59 and/or 60. It is therefore ORDERED AND ADJUDGED that Plaintiff's <u>116</u> Motion to Reconsider this Court's Partial Denial on Plaintiff's Motion to Strike Attorney is DENIED.  On March 11, 2016, Plaintiff filed a <u>120</u> Motion for Leave to Amend its Motion for Reconsideration to add the Rule 7.1(a)(3) conferral. That Motion is DENIED AS MOOT.  Finally, it is ORDERED AND ADJUDGED that Mr. Gulisano's <u>117</u> Motion for Sanctions is REFERRED to Magistrate Judge Jonathan Goodman. This entry constitutes the ENDORSED ORDER in its entirety. Signed by Judge Joan A. Lenard on 3/11/2016. (gie) (Entered: 03/11/2016)
03/11/2016	122	ENDORSED ORDER striking <u>117</u> / <u>118</u> Motion for Sanctions for failure to comply with Local Rule 7.1's conferral requirement. Additionally, movant requests sanctions partially on the basis of Federal Rule of Civil Procedure 11. However, there is no indication that the "safe harbor" provision of Rule 11 has been satisfied. See Fed. R. Civ. P. 11(c)(2) ("The motion must be served under Rule 5, but it must not be filed or be presented to the court if the challenged paper, claim, defense, contention, or denial is withdrawn or appropriately corrected within 21 days after service or within another time the court sets."). Signed by Magistrate Judge Jonathan Goodman on 3/11/2016. (tr00) (Entered: 03/11/2016)