

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

OXEBRIDGE QUALITY RESOURCES
INTERNATIONAL, LLC, and
CHRISTOPHER PARIS, individually,

Plaintiffs,

CASE NO.: 8:15-CV-11-T-17TBM

vs.

MARC TIMOTHY SMITH, individually,
and d/b/a CAYMAN BUSINESS SYSTEMS,

Defendants.

PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTIONS DOCKET NOS. 70, 71 & 72

COMES NOW the plaintiffs, OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC and CHRISTOPHER PARIS cumulatively ("plaintiffs") by and through their undersigned attorney, and file this Defendant's Motions against, MARC TIMOTHY SMITH, individually and d/b/a CAYMAN BUSINESS SYSTEMS cumulatively ("defendants") and states as follows:

1. On February 8, 2016, defendants filed their "Motion to Invalidate the Join Stipulation on Injunction" [Dkt. #70] and "Motion to Re-Open Case." [Dkt. #71]
2. On February 16, 2016, defendants filed their "Request for Sealed Documents to be Immediately Unsealed." [Dkt. #72]
3. Within the above motions, defendants attempt to re-litigate pre-settlement facts and is collaterally estopped from doing so post settlement.
4. A hearing is scheduled on plaintiffs' Motion for Breach of Settlement Agreement on March 16, 2016.

WHEREFORE, Plaintiffs, CHRISTOPHER PARIS and OXEBRIDGE QUALITY RESOURCES INTERNATIONAL, LLC, ask that this Honorable Court enter an order that denies defendants' three motions [Dkts. 70, 71 & 72], takes nothing thereby, and grants such other relief as this Honorable Court deems equitable and just under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served upon defendants via U.S. Mail to Marc Timothy Smith, 8466 LeSourdsville-West Chester Road, Olde West Chester, Ohio 45069.

Respectfully submitted by:

WILLIAM R. WOHSIFER, PA

By: /s/ William R. Wohlsifer

William R. Wohlsifer, Esquire

Fla. Bar No: 86827

1100 E Park Ave Ste B

Tallahassee, Florida 32301

Tel: (850) 219-8888

Fax: (866) 829-8174

E-Mail: william@wohsifer.com;

paralegal@wohsifer.com