

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 14-23109-RNS

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PARTNERS IN HEALTH CARE ASSOCIATIONS, INC., (d/b/a Partners in Health Care, Inc.), UNITED SOLUTIONS GROUP INC., (also d/b/a Debt Relief Experts, Inc.), WALTER S. VARGAS (individually and as an officer or director of United Solutions Group Inc.), and CONSTANZA GOMEZ VARGAS (individually and as a director or manager of United Solutions Group Inc.),

Defendants.

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**DEFENDANTS UNITED SOLUTIONS GROUP, INC., WALTER S. VARGAS AND  
CONSTANZA GOMEZ VARGAS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

Defendants United Solutions Group, Inc., Walter S. Vargas and Constanza Gomez Vargas, through undersigned counsel, request a 30 day extension of time, until October 20, 2014 (October 19 is a Sunday), for filing their Response to the Complaint for Permanent Injunction and Other Equitable Relief (DE 1). A response to the Complaint is currently due on September 18, 2014.

The United Solutions Defendants were served with the Complaint and Summons on August 27, 2014, along with entry of the Receiver. On September 4, 2014, the parties were before the Court to address, among other matters, the impact of the Temporary Restraining Order on non-party Banestral Group. On September 7, 2014, the United Solutions Defendants and the Federal Trade Commission agreed to an injunction and on September 8, 2014, entered a

Stipulated Preliminary Injunction as to the United Solutions Defendant *sans* Banestral Group.  
DE 31.

Then on September 10, 2014, lead counsel for the United Solutions Defendants, Bruce S. Rogow, left the country for an extended visit to Namibia and will not return until October 1, 2014. Undersigned counsel is traveling to Toronto on September 17, 2014, and returning on the evening of September 23, 2014. Due to both counsels' preexisting travel plans outside of the country, undersigned counsel respectfully requests a 30 day extension of time to file a Response to the Complaint.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that undersigned counsel has conferred with Gary L. Ivens, counsel for the Federal Trade Commission, who stated he had no objections to the extension of time sought herein.

Respectfully submitted,

/s/ Tara A. Campion  
BRUCE S. ROGOW  
Fla. Bar No. 067999  
TARA A. CAMPION  
Fla. Bar No. 90944  
BRUCE S. ROGOW, P.A.  
500 E. Broward Blvd., 1930  
Fort Lauderdale, Florida 33394  
Ph: 954.767.8909  
Fax: 954.764.1530  
brogow@rogowlaw.com  
tcampion@rogowlaw.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 16, 2014, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served on this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Filing.

By: /s/ Tara A. Campion  
TARA A. CAMPION

**SERVICE LIST**

*Federal Trade Commission v. Partners In Health Care, et al*  
14-cv-23109-RNS

Gary L. Ivens  
Christopher E. Brown  
**FEDERAL TRADE COMMISSION**  
600 Pennsylvania Avenue NW  
Washington, DC 20580  
202-326-2230  
202-326-3395  
givens@ftc.gov  
cbrown3@ftc.gov

*Counsel for the Federal Trade Commission*

Keith Thomas Grumer  
**GRUMER & MACALUSO, P.A.**  
1 East Broward Blvd., Ste. 1501  
Fort Lauderdale, FL 33301  
954-713-2700  
954-713-2713  
kgrumer@grumerlaw.com

*Counsel for Partners In Health Care  
Association, Inc., and Gary L. Kieper*

Peter D. Russin  
**MELAND RUSSIN & BUDWICK, P.A.,**  
200 South Biscayne Blvd., Ste, 3200  
Miami, FL 33131  
305-358-6363  
305-358-1221  
prussin@melandrussin.com

*Receiver*

Lawrence E. Pecan  
**MELAND RUSSIN & BUDWICK, P.A.,**  
200 South Biscayne Blvd., Ste. 3200  
Miami, FL 33131  
305-358-6363  
305-358-1221  
lpecan@melandrussin.com

*Counsel for the Receiver*