

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 14- 23109-CIV-SCOLA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PARTNERS IN HEALTH CARE
ASSOCIATION, INC. (also d/b/a/ Partners
In Health Care, Inc.),

GARY L. KIEPER (individually and as officer
or director of Partners In Health Care
Association, 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.),

CONSTANZA GOMEZ VARGAS
(individually and as a director or manager of
United Solutions Group Inc.),

Defendants.

DEFENDANTS' REQUEST FOR HEARING

Defendants, PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L. KIEPER, and their counsel GRUMER & MACALUSO, P.A (collectively "Respondents") through undersigned counsel and pursuant to Local Rule 7.1 B, hereby respectfully request that the Court conduct oral argument or hearing on Receiver's Motion for Turnover of Receivership Funds Transferred to Grumer & Macaluso, P.A. and Funds Withdrawn from the Tri Resource Group, LTD Account [DE 46] ("Motion for Turnover"), and states as follows:

GRUMER & MACALUSO, P. A.
ONE EAST BROWARD BOULEVARD, SUITE 1501, FORT LAUDERDALE, FLORIDA 33301 • TELEPHONE (954) 713-2700
PLEADINGS SERVICE E-MAIL: SERVICE@GRUMERLAW.COM

1. Reason for Hearing: Respondents request a hearing on the Motion for Turnover to adequately and fully address each of the arguments and counter-arguments raised in the court filings and supporting affidavits. The filings before the Court present issues of fact necessary to the resolution of the Motion for Turnover, which factual issues Respondents request the Court to resolve after conducting a hearing.

2. Amount of Time Required for Hearing: It is anticipated that thirty (30) minutes will be required for the hearing.

WHEREFORE, Defendants PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L. KIEPER, and GRUMER & MACALUSO, P.A., respectfully request a hearing be granted on the Motion for Turnover [DE46], and any and all other such relief deemed just and proper by this Court.

Respectfully submitted,

GRUMER & MACALUSO, P.A.
Attorneys for DEFENDANTS
One East Broward Boulevard, Suite 1501
Fort Lauderdale, Florida 33301
(954) 713-2700
(954) 713-2713 (fax)
Primary Email: Service@grumerlaw.com
Secondary Emails: kgrumer@grumerlaw.com
slopez@grumerlaw.com

By: /s/ Keith T. Grumer
KEITH T. GRUMER
FLORIDA BAR No.: 550416

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 10th day of October, 2014, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or vial U.S. Mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Keith T. Grumer