

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 15-23070-Civ-COOKE/TORRES

Consumer Financial Protection Bureau,
Plaintiff,

v.

ORION PROCESSING, LLC, a Texas limited liability company, d/b/a World Law Processing, Wld Credit Repair, and World Law Debt; FAMILY CAPITAL INVESTMENT & MANAGEMENT LLC, a Delaware limited liability company, a/k/a FCIAM Property Management; WORLD LAW DEBT SERVICES, LLC, a Delaware limited liability company; WORLD LAW PROCESSING, LLC, a Delaware limited liability company; DERIN SCOTT, an individual; DAVID KLEIN, an individual; and BRADLEY JAMES HASKINS, individually and d/b/a World Law Group, LLP, World Law Group America, LLP, WLD Price Global, Inc., World Law Forms and Mediation, and World Law South;

Defendants,

Shannon Scott, an individual,

Relief Defendant.

**PLAINTIFF'S REQUEST TO ENTER DEFAULT OF RECEIVERSHIP
DEFENDANTS**

TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA:

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff Consumer Financial Protection Bureau ("Bureau") requests that the Clerk of this Court enter the default of Defendants Family Capital Investment & Management LLC a/k/a FCIAM Property Management ("FCIAM"); World Law Debt Services, LLC; and World Law Processing, LLC (collectively "Receivership Defendants").

Federal Rule of Civil Procedure 55(a) provides that “when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default.” The Receivership Defendants have failed to plead or otherwise defend against this lawsuit.¹

According to the attached Affidavit of Laura Schneider:

1. Defendant FCIAM was served with a summons and Complaint for Permanent Injunction and Other Relief (“Complaint”) on August 20, 2015.
2. Defendant World Law Debt Services, LLC was served with a summons and Complaint on August 24, 2015.
3. Defendant World Law Processing, LLC was served with a summons and Complaint on August 24, 2015.
4. The Proofs of Service filed with this Court on August 25, 2015 (Dkt. Nos. 15, 17) establish that service was proper pursuant to Rule 4 of the Federal Rules of Civil Procedure. Copies of the Proofs of Service are attached to the Affidavit of Laura Schneider as Exhibits A through C.
5. The Receivership Defendants have failed to file an Answer to the Complaint or other responsive pleading. This constitutes a failure to plead or otherwise defend in a timely manner under Rule 55(a) of the Federal Rules of Civil Procedure.
6. Further demonstrating their lack of defense in this case, the Receivership Defendants failed to appear at the hearing set by this Court for August 28, 2015 for Defendants to appear and show cause why a preliminary injunction should not be entered.
7. Moreover, upon entry of the Preliminary Injunctions in this case, Receivership Defendants failed to comply with Section VIII of the Preliminary Injunctions (Dkt. Nos. 28, 42). This section required that each defendant, within three business days of service of the Order, prepare and deliver to Plaintiff’s counsel and the Receiver a completed financial statement, a list of all officers and directors, a statement of all transfers of assets worth \$5,000 or more, and a detailed accounting of all gross and

¹ Although Defendant Orion Processing, LLC d/b/a World Law Processing, World Credit Repair and World Law Debt (“Orion”) has also failed to plead or otherwise defend against this lawsuit, the Bureau has been in contact with the Chapter 7 Bankruptcy Trustee on behalf of Orion. The Bureau reserves its right to move for entry of default against Orion.

net profits. To date, none of the Receivership Defendants have provided any such statements to the Bureau.

8. As of the filing of this Request, none of the Receivership Defendants have had counsel appear in this matter on their behalf. As a result, these defendants cannot defend this case and relief may be entered against them by default. *See Palazzo v. Gulf Oil Corp.*, 764 F.2d 1381, 1385 (11th Cir. 1985) (corporate defendants may not appear *pro se*, but instead must be represented by counsel).

REQUEST FOR RELIEF

The attached Affidavit of Laura Schneider and the Court's records demonstrate that the Receivership Defendants have failed to plead or otherwise defend this action. The Receivership Defendants have not retained counsel, made an appearance in the action, or responded to the Complaint. Accordingly, under Rule 55(a), the Clerk should enter Default.

Accordingly, Plaintiff requests that the Clerk of this Court enter the default of Defendants Family Capital Investment & Management LLC a/k/a FCIAM Property Management; World Law Debt Services, LLC; and World Law Processing, LLC.

Dated: December 18, 2015

Respectfully submitted,

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Deputy Enforcement Director
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/s/ Laura Schneider
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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2015, I filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on this day on all counsel who have identified themselves to Plaintiff or who have entered an appearance in this matter, 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 electronic Notices of Electronic Filing.

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