

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(WEST PALM BEACH DIVISION)

CASE NO. 09-80480-CIV-HURLEY/HOPKINS

(Ancillary Proceeding to U.S.D.C. Case No. 08-81565-CIV-HURLEY/HOPKINS)

JONATHAN E. PERLMAN, Esq., as court
appointed Receiver of Creative Capital
Consortium, LLC, et al.,

Plaintiff,

v.

DOROTHY DELISFORT-THEODULE, an individual,
WEALTH BUILDERS CIRCLE, LLC, a Georgia
limited liability company, CARRIBBEAN AIRWAYS,
LLC, a Florida limited liability company, DONNA
HAVER, INC., a Florida limited liability company,
GOOD BUY HOMES, INC., a Florida corporation,
INTERNATIONAL DEVELOPMENT ENTREPRENEURS
OF AMERICA, INC., a Florida corporation, and
COMPLETE AUTO REPAYMENT SOLUTIONS, INC.,
a Georgia corporation,

Defendants.

**MOTION FOR CLERK'S DEFAULT AGAINST DEFENDANT
CARRIBBEAN AIRWAYS, LLC.**

Plaintiff, Jonathan E. Perlman, as court appointed Receiver of Creative Capital Consortium, LLC, et al., by and through undersigned counsel, hereby files this Motion for Entry of Clerk's Default against Defendant **CARRIBBEAN AIRWAYS, LLC.**, ("Defendant") and states in support thereof as follows:

1. Plaintiff caused Defendant to be duly served with the Summons and Complaint in this matter on April 10, 2009 (D.E. 17).
2. Defendant has failed to serve any paper on the undersigned or file any paper or appearance as required by law.

3. Plaintiff respectfully submits that he is entitled to the entry of a Clerk's default against defendant pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

4. Plaintiff has served a copy of this motion upon the Defendant via U.S. Mail.

WHEREFORE, Plaintiff respectfully requests the Clerk of this Court to enter a default against Defendant and for such other and further relief as the court may deem proper and just.

Dated: March 22, 2010
Miami, Florida

Respectfully submitted,

By: /s/ Nancy E. Bergold
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*Attorneys for Receiver,
Jonathan E. Perlman, Esq.*

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2010, the foregoing document was served this day on all persons identified on the below Service List, by U.S. Mail, postage pre-paid.

By: /s/ Nancy E. Bergold
Nancy E. Bergold, Esq.
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SERVICE LIST

**JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital Consortium, LLC, et al. v. DOROTHY DELISFORT THEODULE, et al.
CASE NO. 09-80480-CIV-HURLEY/HOPKINS
United States District Court, Southern District of Florida**

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