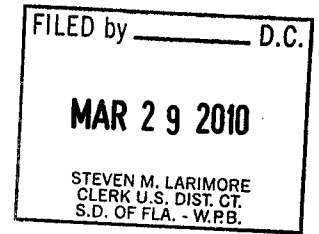


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(WEST PALM BEACH DIVISION)



CASE NO. 09-80480-CIV-HURLEY/HOPKINS  
(Ancillary Proceeding to U.S.D.C. Case no. 08-81565-CIV-HURLEY/HOPKINS)

JOHNATHAN 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; CARIBBEAN 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

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**DEFENDANT DOROTHY-DELISFORT-THEODULE'S RESPONSE TO  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant Dorothy Delisfort now comes to respond to Plaintiff's Motion For  
Partial Summary Judgment filed on December 21,2009, and as follows:

1.

Defendant had not received any notice of this motion until the 23<sup>rd</sup> day of March  
2010, when she received a motion requesting the court to grant this motion.

2.

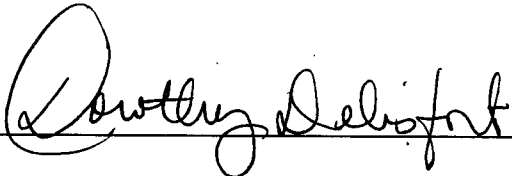
Defendant has not been able to reply to this motion because of the length of this

**document and the short time notice since receiving it.**

**3.**

**Wherefore, Defendant is respectfully requesting that she be granted a thirty (30) day extension from March 23, 2010 to respond.**

**Dated this 26th day of March, 2010.**

A handwritten signature in cursive script, reading "Dorothy Delisfort", is written over a horizontal line.

**Dorothy Delisfort-Theodule  
Pro Se Defendant**

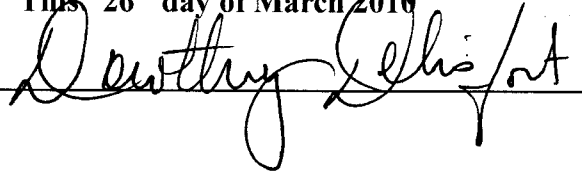
**2108 New London Place  
Snellville, Georgia 30078  
(678) 908 0006**

**CERTIFICATE OF SERVICE**

**I certify that I mailed a true copy of the foregoing Response to Partial Summary Judgment to the Plaintiff addressed as follows:**

**Genovese, Joblove and Battista, PA  
4400 Bank of America Tower  
100 Southwest Second Street  
Miami, FL 33131**

**This 26<sup>th</sup> day of March 2010**

A handwritten signature in cursive script, appearing to read "Dorothy Gifford", is written over a horizontal line.