

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

Case No. 1:21-cv-23472-RNS

Ryan Birmingham, Roman Leonov, Steven Hansen,  
Mitchell Parent, and Jonathan Zarley, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

Alex Doe, *et al.*,

Defendants.

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**DECLARATION OF DENNIS A. GONZÁLEZ**

I, DENNIS A. GONZÁLEZ, declare under penalty of perjury as follows:

1. I am an attorney with the law firm of Holland & Knight LLP, counsel for Plaintiffs Ryan Birmingham, Roman Leonov, Mitchell Parent, Jonathan Zarley, and Steven Hansen (“Plaintiffs”) in the above-captioned proceeding. I have personal knowledge of the facts set forth in this declaration, unless otherwise stated, and I could and would testify competently to them if called as a witness.
2. I am licensed to practice law in Florida with Bar number 1032050.
3. I respectfully submit this Declaration in support of Plaintiffs’ Motion for Default Judgment Seeking Damages Against Defaulted Defendants (the “Motion”).
4. All of the Defendants included in the Motion (“Motion Defendants”)<sup>1</sup> are companies and not natural persons. Consequently, they are not minors, are competent, and are not subject to the Service Members Civil Relief Act.
5. The Motion Defendants are also neither infants nor incompetent persons.

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<sup>1</sup> The “Motion Defendants” are (1) Notus, LLC (“Notus”), (2) Global E-Advantages, LLC (“Global E”), (3) Easy Com, LLC (“Easy Com”), (4) Shopostar, LLC (“Shopostar”), and (5) Grovee, LLC (“Grovee”).

6. Attached hereto as **Exhibit A** is a true and correct copy of the Declaration of Roman Leonov in support of Plaintiffs' Motion.

7. Attached hereto as **Exhibit B** is a true and correct copy of the Declaration of Mitchell Parent in support of Plaintiffs' Motion.

8. Attached hereto as **Exhibit C** is a true and correct copy of the Declaration of Jonathan Zarley in support of Plaintiffs' Motion.

9. Attached hereto as **Exhibit E** is a true and correct copy of the Declaration of Steven Hansen in support of Plaintiffs' Motion.

Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 9, 2023

Miami, Florida

*/s/ Dennis A. González*

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