

---

**From:** cmecfautosender@flsd.uscourts.gov  
**Sent:** Tuesday, April 23, 2024 6:15 PM  
**To:** flsd\_cmecf\_notice@flsd.uscourts.gov  
**Subject:** Activity in Case 1:21-cv-23472-RNS Birmingham et al v. Rofx.net et al Motion for Writ

*[External email]*

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Southern District of Florida

## Notice of Electronic Filing

The following transaction was entered by Gonzalez, Dennis on 4/23/2024 at 6:15 PM EDT and filed on 4/23/2024

**Case Name:** Birmingham et al v. Rofx.net et al

**Case Number:** [1:21-cv-23472-RNS](#)

**Filer:** Steven Hansen  
Roman Leonov  
Jonathan Zarley

**WARNING: CASE CLOSED on 03/08/2024**

**Document Number:** [254](#)

**Docket Text:**

**[MOTION for Writ of Garnishment on Bank of America, N.A. by Steven Hansen, Roman Leonov, Jonathan Zarley. \(Attachments: # \(1\) Exhibit 1 - Writ of Garnishment\)\(Gonzalez, Dennis\)](#)**

**1:21-cv-23472-RNS Notice has been electronically mailed to:**

Andrew Russell Kruppa andrew.kruppa@squirepb.com, andrew-r-kruppa-5578@ecf.pacerpro.com, FLA\_DCKT@squirepb.com, patricia-sullivan-8736@ecf.pacerpro.com, patricia.sullivan@squirepb.com, shannon-w-munsell-0754@ecf.pacerpro.com, shannon.munsell@squirepb.com

Daniel Stuart Newman dan.newman@nelsonmullins.com, brenda.fradera@nelsonmullins.com, jessica.falcon@nelsonmullins.com

David Alan Frankel david@bluelotuslaw.com, eservice@bluelotuslaw.com, paralegal@bluelotuslaw.com

Dennis Alexander Gonzalez dennis.gonzalez@hklaw.com

James Evans Gillenwater gillenwaterj@gtlaw.com, FLService@gtlaw.com, james-gillenwater-7906@ecf.pacerpro.com, michelle.cruz@gtlaw.com

John P. McAdams john.mcadams@pallasllp.com

Jose Angel Casal jose.casal@hklaw.com, hapi@hklaw.com, josie.vila@hklaw.com

Mark Allan Salky salkym@gtlaw.com, burkek@gtlaw.com, mark-salky-1667@ecf.pacerpro.com, mialitdock@gtlaw.com

Matthew R. DiBlasi Matthew.DiBlasi@hklaw.com

Megan Nicole Kilissanly megan.kilissanly@nelsonmullins.com

NATTPEMOL KRINARA(Terminated) nattpemol@hotmail.com, borisovevgeny@mail.ru

P Jan Kubicz jan.kubicz@squirepb.com, doreen-dougherty-8483@ecf.pacerpro.com, doreen.dougherty@squirepb.com, jan-kubicz-2829@ecf.pacerpro.com

Robert F. Cooke litigation@cookecarbonell.com, jlc@cookecarbonell.com, rfc@cookecarbonell.com

Sydney Brooke Alexander sydney.alexander@hklaw.com, aida.guerrero@hklaw.com, miurel.martinez@hklaw.com

Warren E. Gluck warren.gluck@hklaw.com

**1:21-cv-23472-RNS Notice has not been delivered electronically to those listed below and will be provided by other means. For further assistance, please contact our Help Desk at 1-888-318-2260.:**

Art Sea Group Ltd.  
99 Centum Dong-ro  
Haeundae-gu,  
South Korea

Auro Advantages, LLC  
251 Little Falls Drive  
Wilmington, DE 19808

Easy Com, LLC  
155 Fleet St.  
Portsmouth, NH 03801

Global E-Advantages LLC  
55 14th Avenue  
North Tonawanda, NY 14120

Grovec, LLC  
717 N. Union St. Suite 45  
Wilmington, DE 19805

Mayon Solutions Ltd  
207 Regent Street

3rd Floor  
London, W1B3HH  
UK

Mayon Solutions, LLC  
159 Main Street  
Unit 100  
Nashua, NH 03060

Notus, LLC  
3801 East Florida Avenue  
Suite 400  
Denver, CO 80210

Profit Media Group LP  
4 Queen Street  
Suite 1  
Edinburgh, EH21JE  
UK

Shopostar, LLC  
7887 E. Belleview Ave. Suite 3300  
Miami, FL 33131

Trans-Konsalt MR Ltd.  
ul. Lyuben Karavelov 28  
1142 Sofia Center  
Sofia,  
Bulgaria

Boonruk Ruamkit Co., Ltd. (Terminated)  
c/o Nattpemol Krinara  
131/5 Montri Rd.  
Tai Chang, Mueng,  
Phang-NGA, 82000  
Thailand

IT Outsourcing Co., Ltd. (Terminated)  
c/o Nattpemol Krinara  
520/3 Mu 3  
Bang Non Sub District  
Mueng Ramong District,  
Ramong, 85000  
Thailand

Borys Konovalenko  
1321 Upland Dr. PMB 4787  
Houston, TX 77043-4718

Ivan Hrechaniuk  
85 Great Portland Street  
London, W1W7LT

UK

Marina Garda  
11 Szentkiralyi Street  
Ground Floor  
Apart. 11  
Budapest,  
Hungary

Olga Tielly  
207 Regent Street  
3rd Floor  
London, W1B3HH  
UK

Papahratsorn Raviratporn(Terminated)  
c/o Nattpemol Krinara  
131/5 Montri Rd.  
Tai Chang, Mueng,  
Phang-NGA, 82000  
Thailand

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1105629215 [Date=4/23/2024] [FileNumber=24352951-0] [8073f47e3bd967936d0b34c389b66b39790187bda7164ccad3f0e88c08676e0f209e7bd88c5b31694b1db10234485ca32c2a90cf76707b6a791e5e42bc543fa9]]

**Document description:**Exhibit 1 - Writ of Garnishment

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1105629215 [Date=4/23/2024] [FileNumber=24352951-1] [2f4183dc5ce44460e168b09069262b1e30abcb2f61bfcc8f8c29c719d41e9a51a90dc066f3890035e3350678026b378f148c783aed32b101b77a7c064ffc5b1e]]

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

RYAN BIRMINGHAM, ROMAN LEONOV,  
STEVEN HANSEN, MITCHELL PARENT, and  
JONATHAN ZARLEY,

Case No. 21-CV-23472-RNS

Plaintiffs,

v.

ALEX DOE, *et al.*,

Defendants.

---

**PLAINTIFFS/JUDGMENT CREDITORS'  
MOTION FOR WRIT OF GARNISHMENT**

Plaintiffs/Judgment Creditors Roman Leonov, Steven Hansen, and Jonathan Zarley (“Judgment Creditors”) request that the Clerk of Court issue a Writ of Garnishment (attached hereto as **Exhibit 1**) to third party, Bank of America, N.A., and in support state as follows:

1. On March 8, 2024, the Court entered a Final Default Judgment in favor of Judgment Creditors and against Defendant/Judgment Debtor ShopoStar, LLC (“ShopoStar”) totaling \$1,116,000.00. *See* ECF No. 253 (and hereinafter “Final Judgment”).

2. Judgment Creditors now seek to enforce and satisfy their judgment against ShopoStar.

**MEMORANDUM OF LAW**

3. Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure, proceedings in aid of execution of a judgment must follow the practices and procedures of the state in which the district court is located at the time such remedy is sought. Fed. R. Civ. P. 69(a); *Papdopoulos v. Sidi*, 547 F. Supp. 2d 1262, 1265 (S.D. Fla. 2008).

4. Under Florida law, the garnishment remedy is governed by, *inter alia*, Section 77.03, Florida Statutes, which provides:

After judgment has been obtained against defendant but before the writ of garnishment is issued, the plaintiff, the plaintiff's agent or attorney, shall file a motion (which shall not be verified or negative defendant's exemptions) stating the amount of the judgment. The motion may be filed and the writ issued either before or after the return of execution.

5. Upon information and belief, Judgment Creditors do not believe that ShopoStar has in its possession any visible property on which a levy can be made sufficient to completely satisfy the Final Judgment.

6. Upon information and belief, Judgment Creditors believe that third party, Bank of America, N.A., may have tangible or intangible personal property of ShopoStar. Therefore, Judgment Creditors seeks to serve a Writ of Garnishment on Bank of America, N.A.

WHEREFORE, for the foregoing reasons, and pursuant to Fed. R. Civ. 69(a) and Florida Statutes Chapter 77, Plaintiffs/Judgment Creditors hereby request that the Clerk of Court issue a Writ of Garnishment directed to Bank of America, N.A. (in the form attached hereto as **Exhibit 1**), in an attempt to satisfy the Final Judgment, and to command Bank of America, N.A. to answer the Writ according to law.

Dated April 23, 2024

Respectfully submitted,

/s/ Dennis A. González

**Dennis A. González** (Fla. Bar No. 1032050)

[Dennis.Gonzalez@hklaw.com](mailto:Dennis.Gonzalez@hklaw.com)

Jose A. Casal (Fla. Bar No. 767522)

[Jose.Casal@hklaw.com](mailto:Jose.Casal@hklaw.com)

Holland & Knight LLP

701 Brickell Avenue, Suite 3300

Miami, Florida 33131

Telephone: 305-374-8500

Warren E. Gluck (N.Y. Bar No. 4701421)

*Pro hac vice*

[Warren.Gluck@hklaw.com](mailto:Warren.Gluck@hklaw.com)

Holland & Knight LLP

31 West 52nd Street

New York, New York 10019

*Attorneys for Plaintiffs/Judgment Creditors*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or about April 23, 2024, a true and accurate copy of PLAINTIFFS/JUDGMENT CREDITORS' MOTION FOR WRIT OF GARNISHMENT was served on counsel of record via the CM/ECF system. A copy of the foregoing document was served upon Defendants at the addresses listed below via mail or as otherwise indicated:

|  |   |
|--|---|
| <b>Art Sea Group Ltd.</b><br>Via publication on Plaintiffs' website  | <b>Auro Advantages, LLC</b><br>Via publication on Plaintiffs' website   |
| <b>Easy Com, LLC</b><br>Via publication on Plaintiffs' website   | <b>Marina Garda</b><br>Via publication on Plaintiffs' website           |
| <b>Global E-Advantages LLC</b><br>c/o Registered Agent<br>North West Registered Agent LLC<br>8 The Green, Suite B,<br>Dover, DE 19901    | <b>Grovec, LLC</b><br>Via publication on Plaintiffs' website            |
| <b>Ivan Hrechaniuk</b><br>Via publication on Plaintiffs' website   | <b>Borys Konovalenko</b><br>Via email to<br>borys.konovalenko@gmail.com |
| <b>Mayon Solutions Ltd</b><br>Via email to info@mayon.solutions and<br>sales@mayon.solutions   | <b>Mayon Solutions, LLC</b><br>Via email to<br>Mayon.llc@gmail.com      |
| <b>Notus, LLC</b><br>Via publication on Plaintiffs' website  | <b>Profit Media Group LP</b><br>Via publication on Plaintiffs' website  |
| <b>Shopostar, LLC</b><br>c/o Registered Agent<br>Colorado Registered Agent LLC<br>1942 Broadway Street, Suite 314C,<br>Boulder, CO 80302 | <b>Olga Tielly</b><br>Via publication on Plaintiffs' website            |
| <b>Trans-Konsalt MR Ltd.</b><br>Via publication on Plaintiffs' website   |   |

Respectfully submitted,

*/s/ Dennis A. González*

**Dennis A. González**

Florida Bar No. 1032050

[Dennis.gonzalez@hklaw.com](mailto:Dennis.gonzalez@hklaw.com)

Holland & Knight LLP

701 Brickell Avenue, Suite 3300

Miami, Florida 33131

Telephone: 305-374-8500

*Attorneys for Plaintiffs/Judgment Creditors*



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

RYAN BIRMINGHAM, ROMAN LEONOV,  
STEVEN HANSEN, MITCHELL PARENT, and  
JONATHAN ZARLEY,

Case No. 21-CV-23472-RNS

Plaintiffs,

v.

ALEX DOE, *et al.*,

Defendants.

\_\_\_\_\_ /

**WRIT OF GARNISHMENT**

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE:

YOU ARE COMMANDED to summon the “Garnishee”, **Bank of America, N.A.**, whose address is c/o Registered Agent C T Corporation System 1200 South Pine Island Road, Plantation, FL 33324 to serve an answer to this writ on Dennis González, Esq., Plaintiffs’ attorney, whose address is 701 Brickell Avenue, Suite 3300, Miami, FL 33131 within 20 days after service on the Garnishee, exclusive of the day of service, and to file the original with the clerk of this Court either before service on the attorney or immediately thereafter, stating whether the Garnishee is indebted to “Defendant”, **ShopoStar, LLC**, at the time of the answer or was indebted at the time of service of the writ, or at any time between such times, and in what sum and what tangible and intangible personal property of the Defendant the Garnishee is in possession or control of at the time of the answer or had at the time of service of this writ, or at any time between such times, and whether the Garnishee knows of any other person indebted to the Defendant or who may be in possession or control of any of the property of the Defendant.

The amount set in Plaintiffs/Judgment Creditors' motion is **\$1,116,000.00**. The Judgment remains due and unpaid.

DATED on this \_\_\_\_\_ day of April 2024.

ANGELA E. NOBLE

As Clerk of the Court

By \_\_\_\_\_

As Deputy Clerk