

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

CASE NO. 3:22-cv-00487-TJC-MCR

FEDERAL TRADE COMMISSION,

Plaintiffs,

v.

MICHAEL RANDO, et al.,

Defendants.

UNOPPOSED MOTION TO MODIFY ASSET FREEZE

Defendants Michael Rando, Valerie Rando (“Defendants”), by and through undersigned counsel, respectfully request the Court modify the asset freeze in the Stipulated Preliminary Injunction (Doc. 101) (“SPI”) to permit the Defendants to surrender two vehicles pursuant to the Parties’ settlement agreement and to direct Retail Ecommerce Ventures, LLC to issue a payment of \$17,000 from its retained distributions in the name of “Michael Rando” to undersigned counsel for distribution to Defendants, which is the amount needed to surrender these vehicles.

One term of the Parties’ pending settlement agreement requires the Defendants to surrender two vehicles, a 2017 Maserati Gran Turismo and a 2022 Range Rover Sport. In order to cover the deficit in the loans for these vehicles, the Federal Trade Commission and the Receiver have agreed to release \$17,000 from Retail Ecommerce Ventures, LLC to the Defendants.

WHEREAS the Defendants respectfully move the Court to modify the asset freeze in the SPI to permit the Defendants to surrender two vehicles pursuant to the Parties' settlement agreement and to direct Retail Ecommerce Ventures, LLC to issue a payment of \$17,000 from its retained distributions in the name of "Michael Rando" to undersigned counsel for distribution to Defendants. A proposed order to accomplish this is attached for the Court's consideration.

LOCAL RULE 3.01(g) CERTIFICATE OF CONFERRAL

I certify that, on November 3, 2022, counsel for the Defendants conferred with counsel for Plaintiff and the Receiver. Counsel for the Plaintiff and the Receiver do not oppose the relief requested in this Motion.

Dated: November 3, 2022

**GUNSTER, YOAKLEY &
STEWART, P.A.**

By: /s/ Michael R. Freed

Michael R. Freed

Florida Bar No. 69205

1 Independent Drive, Suite 2300

Jacksonville, FL 32202

mfreed@gunster.com

L.T. Lafferty

Florida Bar No. 975575

401 East Jackson Street, Suite 2500

Tampa, FL 33602

ltlafferty@gunster.com

Nathan W. Hill

Florida Bar No. 91473

200 South Orange Ave, Suite 1400

Orlando, Florida 32801

nhill@gunster.com

Jonathan K. Osborne

Florida Bar No. 95693

josborne@gunster.com

Samantha V. Medina

Florida Bar No. 1030933

smedina@gunster.com

450 East Las Olas Boulevard, Suite 1400

Fort Lauderdale, Florida 33301

Telephone: (954) 462-2000

Facsimile: (954) 523-1722

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of November, 2022 a true and correct copy of the foregoing document was electronically filed with the United States District Court for the Middle District of Florida using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Michael R. Freed

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**PROPOSED ORDER ON
UNOPPOSED MOTION TO MODIFY ASSET FREEZE**

THIS CAUSE comes before the Court on Defendants Michael Rando and Valerie Rando (“Defendants”), Unopposed Motion to Modify the Asset Freeze to permit the Defendants to surrender two vehicles and to direct Retail Ecommerce Ventures, LLC to issue a payment of \$17,000 from its retained distributions in the name of “Michael Rando” to undersigned counsel for distribution to Defendants. Accordingly, it is here by

ORDERED that Defendants’ Unopposed Motion to Modify the Asset Freeze is **GRANTED**. The Asset Freeze in the Stipulated Preliminary Injunction (Doc. 101) is hereby modified to as follows:

1. Defendants are directed to surrender two vehicles, a 2017 Maserati Gran Turismo and a 2022 Range Rover Sport;

2. Retail Ecommerce Ventures, LLC is ordered to distribute \$17,000 from accrued distributions held in the name of Michael Rando to Gunster.

DONE AND ORDERED in Jacksonville, Florida the _____ day of November, 2022.

Hon. Timothy J. Corrigan
United States District Judge

Copies:

Counsel of Record