

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

SIMPLE HEALTH PLANS LLC, et al.,

Defendants.

Case No.: 18-cv-62593-DPG

**DEFENDANT STEVEN DORFMAN'S
MOTION TO EXTEND MONTHLY ALLOWANCE**

Defendant, Steven Dorfman (“**Dorfman**”), through undersigned counsel, files this motion to extend his monthly allowance and states:

On October 31, 2018, the Court, upon the FTC’s request, entered the *Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief* (the “**Asset Freeze Order**”) [DE 15]. Among other things, the Asset Freeze Order enjoined Mr. Dorfman from accessing or using *any* of his personal funds wherever held. *Id.*, § III.

On December 3, 2018, Mr. Dorfman filed a motion to modify the Asset Freeze Order to pay his reasonable living expenses, which he did not otherwise have alternative resources to pay for [DE 41]. The FTC opposed Mr. Dorfman’s request for an allowance for living expenses [DE 44]. However, following a hearing on the motion [DE 45], the Court entered an order granting Dorfman’s request (the “**Modified Asset Freeze Order**”) [DE 51].

The Modified Asset Freeze Order authorized Mr. Dorfman to access \$5,000 per month for living expenses (the “**Allowance**”) from his frozen personal assets. *Id.*, ¶ 3.

On June 21, 2019, the Court entered an Order extending Dorfman’s entitlement to the monthly Allowance through the month of October, 2019. [D.E. 170].

Mr. Dorfman seeks to extend the Allowance for an additional period. Dorfman's financial situation has not changed since he initially requested the Allowance and he needs the Allowance in order to pay for his basic living expenses.

WHEREFORE, Defendant, Steven Dorfman, respectfully requests an Order of the Court, substantially in the form annexed hereto extending his monthly Allowance of \$5,000 and for all further relief that the Court deems just and proper.

Local Rule 7.1(a)(3) Certificate

The undersigned certifies that he has conferred with the FTC regarding the relief sought in the motion in a good faith effort to resolve the issues raised in the motion and has been unable to do so. The FTC has indicated that it opposes the requested relief.

Dated: October 2, 2019

DLA Piper LLP (US)

/s/ Ryan D. O'Quinn

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CERTIFICATE OF SERVICE

The undersigned certifies that he filed this pleading through the court's electronic filing system and that all parties requesting electronic notice of pleadings have been served with the pleading.

/s/ Ryan D. O'Quinn

Ryan D. O'Quinn