

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO.: 0:26-cv-60110-RS

PT. LEGON PARI and)
LOGISTICS PLUS, INC.,)
)
Plaintiffs,)
)
vs.)
)
GA TELESIS, LLC, KUEHNE + NAGEL,)
INC., and PT. KUEHNE NAGEL)
INDONESIA d/b/a PT. NAKU FREIGHT)
INDONESIA,)

Defendants.

PLAINTIFFS’ EX PARTE MOTION FOR AN ORDER AUTHORIZING ALTERNATE SERVICE OF PROCESS ON DEFENDANT PT. KUEHNE NAGEL INDONESIA D/B/A PT. NAKU FREIGHT INDONESIA PURSUANT TO FED. R. CIV. P. 4(f)(3)

Plaintiffs PT. Legon Pari (“PTL”) and Logistics Plus, Inc. (“LP”) (together, “Plaintiffs”) respectfully move this Court, on an *ex parte* basis¹, for an order authorizing alternate service of process, via email, LinkedIn, or website posting, on one defendant, PT. Kuehne Nagel Indonesia d/b/a PT. Nako Freight Indonesia (“K+N Indonesia”) under Federal Rule of Civil Procedure 4(f)(3). K+N Indonesia is an Indonesian company that historically has primarily conducted its business on the internet and over email. This Court should allow service of K+N Indonesia via email, LinkedIn, or website posting in this case for two reasons: (1) service via email, by contacting a party through LinkedIn, or by posting on a designated website is appropriate and comports with constitutional notions of due process, particularly given K+N Indonesia’s history of utilizing the

¹ Plaintiffs are moving for alternate service *ex parte* specifically with respect to K+N Indonesia as Plaintiffs have yet to provide K+N Indonesia with notice of this action.

internet and email as a primary means of communication to conduct its business; and (2) there are no international agreements prohibiting service on K+N Indonesia by email, through LinkedIn, or by posting on a website. For these reasons, and those more fully stated in the following Memorandum of Law in Support, Plaintiffs' Motion should be granted.

MEMORANDUM OF LAW IN SUPPORT

I. INTRODUCTION

Under Federal Rule of Civil Procedure 4(f)(3), Plaintiffs request an order authorizing service of process on K+N Indonesia via email, through LinkedIn, or by posting on a designated website. Alternate service by email, LinkedIn, or designated website posting is appropriate because K+N Indonesia relies on the internet and email communications to operate its business. As such, Plaintiffs can contact K+N Indonesia directly and provide notice of Plaintiffs' claims against it electronically via email to K+N Indonesia's known email addresses, including a general email address for the company as a whole and other email addresses belonging to confirmed employees that communicated with Plaintiffs during the events underlying this action.

Plaintiffs seek permission to serve K+N Indonesia via email because it is allowed under relevant law and procedure and would be the most reliable, efficient, and cost-effective way for all parties to serve and receive notice of this case. Separately, Plaintiffs also request that the Court permit them to serve K+N Indonesia via LinkedIn messenger. Plaintiffs have identified several K+N Indonesia employees that maintain active LinkedIn profiles. As a result, LinkedIn messenger is another reliable way to notify K+N Indonesia about this action. Finally, Plaintiffs request the Court permit them to serve K+N Indonesia via website posting. To do so, Plaintiffs intend to create a website where they will post copies of the Complaint and all other documents filed in this action, the address of which Plaintiffs will send to K+N Indonesia via its identified email addresses.

Plaintiffs respectfully submit that an order allowing service of process and service of all filings and discovery via email, through LinkedIn, or by posting on a designated website will benefit all parties and the Court by ensuring K+N Indonesia receives immediate notice of this action. Alternative service will also allow this action to move forward expeditiously and in the most cost-effective manner. Absent the ability to serve K+N Indonesia by email, through LinkedIn, or by website posting, service by formal methods could take between six and twelve months, halting progress in this case. Therefore, Plaintiffs respectfully request the Court grant their Motion.

II. LAW AND ARGUMENT

Federal Rule of Civil Procedure 4(f)(3) governs the service of parties residing in a foreign country. It states that “[u]nless federal law provides otherwise, an individual...may be served at a place not within any judicial district of the United States...by other means not prohibited by international agreement, as the court orders.” F.R.C.P. 4(f)(3). Here, alternative service via email, LinkedIn, or website posting is appropriate for two reasons: (1) it is reasonably calculated to apprise K+N Indonesia of the pendency of this action and afford it an opportunity to present its objections; and (2) service via email, LinkedIn, or website posting is not otherwise prohibited by any relevant international agreement.

A. Service Via Email, LinkedIn, or Website Posting Is Appropriate Under Federal Rule of Civil Procedure 4(f)(3).

Federal Rule of Civil Procedure 4(h)(2) allows a foreign business entity to be served with process “in any manner prescribed by Rule 4(f),” including any manner ordered under Rule 4(f)(3). *U.S. Commodity Futures Trading Comm’n v. Aliaga*, 272 F.R.D. 617, 619 (S.D. Fla. 2011). The decision to issue an order allowing an alternate means of service lies within the sole discretion of the District Court. *See, e.g., Brookshire Bros. v. Chiquita Brands Int’l, Inc.*, No. 05-CIV-21962, 2007 WL 1577771, at *2 (S.D. Fla. May 31, 2007) (“[D]istrict courts have broad discretion under

Rule 4(f)(3) to authorize other methods of service that are consistent with due process and are not prohibited by international agreements.”); *In re Int’l Telemedia Assocs.*, 245 B.R. 713, 720 (N.D. Ga. 2000) (noting that Rule 4(f)(3) is designed to allow courts discretion and broad flexibility to tailor the methods of service for a particular case). Rule 4 does not require that a party attempt service of process via the methods enumerated under subsections (f)(1) and (f)(2), including by diplomatic channels and letters rogatory, before petitioning the court for alternative relief under subsection 4(f)(3). *Brookshire Bros., Ltd.*, 2007 WL 1577771, at *1.

In *Brookshire*, this Court allowed substitute service on a party’s attorney pursuant to Rule 4(f)(3) holding as follows:

Rule 4(f)(3) is one of three separately numbered subsections in Rule 4(f) and each subsection is separated from the one previous merely by the simple conjunction ‘or.’ Rule 4(f)(3) is not subsumed within or in any way dominated by Rule 4(f)’s other subsections; it stands independently, on equal footing. Moreover, no language in Rules 4(f)(1) or 4(f)(2) indicates the primacy, and certainly Rule 4(f)(3) indicates no qualifiers or limitations which indicate its availability only after attempting service of process by other means.

Brookshire Bros., Ltd., 2007 WL 1577771, at *1; *see, also, TracFone Wireless, Inc. v. Bitton*, 278 F.R.D. 687, 692 (S.D. Fla. Jan. 11, 2012) (under Rule 4(f)(3), “there is no indication from the plain language of the Rule that the three subsections, separated by the disjunctive “or,” are meant to be read as a hierarchy.”). This Court further held, “[t]he invocation of Rule 4(f)(3), therefore, is neither a last resort nor extraordinary relief.” *Brookshire Bros., Ltd.*, 2007 WL 1577771, at *2.

Additionally, the Constitution itself does not mandate that service be effectuated in any particular way. Rather, Constitutional due process considerations require only that the method of service selected be “reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.” *Brookshire Bros., Ltd.*, 2007 WL 1577771, at *1 (quoting *Mullane v. Cent. Hanover Bank & Trust*

Co., 339 U.S. 306, 314 (1950)); *see also TracFone Wireless, Inc.*, 278 F.R.D. at 692. Accordingly, federal courts have allowed a variety of alternative service methods, including service by email, through LinkedIn, or website posting, where a plaintiff demonstrates the likelihood that the proposed alternative method of service will notify a defendant of the pendency of the action. *In re Int'l Telemedia Assocs.*, 245 B.R. at 721 (“If any methods of communication can be reasonably calculated to provide a defendant with real notice, surely those communication channels utilized and preferred by the defendant himself must be included among them.”).

In similar cases, several courts have held that alternate forms of service pursuant to Rule 4(f)(3), such as email service, are appropriate. *See, e.g., Chanel, Inc. v. Zhixian*, No. 10-CV-60585, 2010 WL 1740695, at *2 (S.D. Fla. Apr. 29, 2010) (e-mail service “reasonably calculated to notify Defendants of the pendency of this action and provide him with an opportunity to present objections.”); *TracFone Wireless, Inc.*, 278 F.R.D. at 693 (finding that service of process by e-mail was reasonably calculated to apprise the defendants of the action and give it an opportunity to respond); *In re Int'l Telemedia Associates*, 245 B.R. at 722 (finding email service was appropriate).

Courts also recognize that service through social media platforms, like LinkedIn, is appropriate. *See, e.g., Kipu Sys., LLC v. ZenCharts, LLC*, No. 17-24733-CIV, 2018 WL 8264634, at *2 (S.D. Fla. Mar. 29, 2018) (“We also find good cause for Plaintiff to serve Defendants via their respective LinkedIn accounts and publication on Plaintiff's website.”); *Sec. & Exch. Comm'n v. Martin*, No. 6:17-cv-1385-Orl-37GJK, 2019 WL 13474699, at *4 (M.D. Fla. May 8, 2019) (“As such, service via email, Facebook, and LinkedIn pursuant to Rule 4(f)(3) is sufficient.”). In *Kipu Sys., LLC*, this Court found LinkedIn was an appropriate method to serve a party when there was evidence that the LinkedIn account was being used. *Kipu Sys., LLC*, 2018 WL 8264634, at *2

(“For example, Plaintiff claims that Karkalichev reviewed Plaintiff’s counsel LinkedIn profile after the complaint was filed in this case – suggesting that LinkedIn is a successful platform to provide notice to Defendants.”).

Additionally, service of a defendant by posting on a designated website, such as a plaintiff’s website, has been deemed an appropriate means of service by website posting. *Birmingham v. Doe*, 593 F. Supp. 3d 1151, 1160 (S.D. Fla. 2022). A proposed method of website posting need only be “reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action.” *Birmingham v. Doe*, 593 F. Supp. 3d 1151, 1160 (S.D. Fla. 2022) (citing *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315-16, 70 S. Ct. 652, 94 L. Ed. 865 (1950)). Here, service on K+N Indonesia by email, LinkedIn, or website posting will satisfy due process by apprising it of the action and giving it the opportunity to answer Plaintiffs’ claims. During the events underlying this action, K+N Indonesia’s preferred method of communication with Plaintiffs was via email. (**Exhibit A**, Declaration of Gregory J. Phillips (“Phillips Dec.”) ¶ 2.) Plaintiffs have identified three email addresses they can use contact K+N Indonesia, including a general email address for K+N Indonesia: kid.oss@kuehne-nagel.com. (*Id.*, ¶ 3.) Additionally, during the events underlying this matter, Plaintiffs communicated with the following individuals working at K+N Indonesia:

- Jeremy Jeremy – in K+N Indonesia’s Operational Care Control Department at jeremy.jeremy@kuehne-nagel.com; and
- Aprilia Kusuma – at the time, K+N Indonesia’s Gateway & Procurement Specialist at aprilia.kusuma@kuehne-nagel.com.

(*Id.*, ¶ 4.) Plaintiffs intend to send copies of the Complaint and all other filings to these email addresses to ensure they reach K+N Indonesia. (*Id.*, ¶ 5.)

Allowing Plaintiffs to serve K+N Indonesia via email will also save considerable time and resources. Formal service of parties in Indonesia is a time-consuming process with the U.S. State Department estimating that it can take six to twelve months.² Service by email will expedite the service process and permit the parties to proceed with this case in a timely manner. Therefore, because Plaintiffs have identified multiple email addresses by which to serve K+N Indonesia, email service in this case is appropriate and comports with constitutional notions of due process, particularly given K+N Indonesia's history of utilizing email as a primary means of communication to conduct its business.

Plaintiffs also request that the Court permit them to serve K+N Indonesia via LinkedIn messenger. Plaintiffs have identified the following K+N Indonesia employees who appear to have active LinkedIn profiles:

- Ali Fatih Erdogan – Managing Director
- Dominik Kniejski – General Manager, Contract Logistics Indonesia
- Pavan Thalapalli – National Finance Manager
- Tarek Rhlid – Airfreight General Manager
- Kristiani Wijaya – Operational Key Account Manager
- Ossy Yuni Arcan – Customs Supervisor
- Wanda Setyowati – Sea Logistics ISC Customer Care Specialist
- Mario Vrljicak – General Manager Sea Logistics Indonesia
- Fauler Tampubolon – National Project Logistic Customer Excellence Manager
- Verliana Istiqomah – Export Sea Logistics Customer Care Specialist
- Agus Mulyono – General Manager Customs House Brokerage and Trade Control

² See <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Indonesia.html>.

(*Id.*, ¶ 6.) LinkedIn shows that most of these employees regularly use LinkedIn as they commented on or reacted to other posts within the last week. (*Id.*, ¶ 7.) Because all of these employee accounts appear to be active, with many of these employees interacting with other posts recently, sending the Complaint and all other filings in this matter directly to K+N Indonesia employees via LinkedIn messenger is reasonably calculated to provide K+N Indonesia with notice of this action. (*Id.*) Therefore, the Court should permit this alternative service method as well.

Finally, if email and LinkedIn service are unavailable, Plaintiffs plan to create a website where they will post copies of the Complaint and all other documents filed in this action. (*Id.*, ¶ 9.) Plaintiffs will provide the address for their website to K+N Indonesia via the emails listed above. (*Id.*, ¶ 10.) Posting all of the documents filed in this matter on the website will provide notice to K+N Indonesia sufficient to meet the due process requirements for service of process and notice pursuant to Federal Rule of Civil Procedure 4, appraise K+N Indonesia of the pendency of this action, and afford K+N Indonesia an opportunity to present its answer and objection.

B. No International Agreement With Indonesia Prohibits Service Via Email, LinkedIn, or Website Posting.

Federal Rule of Civil Procedure 4(f)(3) allows alternative methods for service of process, so long as those methods are not prohibited by international agreement and are directed by the Court. *See Prewitt Enters., Inc. v. The Org. of Petrol. Exporting Countries*, 353 F.3d 916, 923 (11th Cir. 2003); *see also Brookshire Bros., Ltd. v. Chiquita Brands Int'l*, Case No. 05-CIV-21962, 2007 WL 1577771, at *2 (S.D. Fla. May 31, 2007). In fact, “as long as court-directed and not prohibited by an international agreement, service of process ordered under Rule 4(f)(3) may be accomplished in contravention of the laws of the foreign country.” *Chanel, Inc. v. Zhixian*, No. 10-CV-60585, 2010 WL 1740695, at *2 (S.D. Fla. Apr. 29, 2010).

Service via email, LinkedIn, or website posting is not prohibited by relevant international agreement. K+N Indonesia is domiciled in the Republic of Indonesia. Indonesia is not a signatory to the Hague Convention. There are no service treaties between the United States and Indonesia. Thus, there are no international agreements prohibiting service on K+N Indonesia by email, LinkedIn, or website posting.

III. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request the Court grant their Motion and permit them to serve Defendant K+N Indonesia via the email addresses identified above, via LinkedIn messenger, or via a designated website.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), I hereby certify that conferral with the opposing party regarding the relief sought in this motion is not required as this is a properly filed *ex parte* motion.

DATED: January 20, 2026

Respectfully Submitted:

/s/ Sophia Bernard, Esq.
Sophia Bernard, Esq.
Florida Bar No. 113805
Elana Faniel, Esq.
Florida Bar No. 110747
TAYLOR NELSON
SLATTERY BERNARD PL
20 3rd Street SW, Suite 209
Winter Haven, FL 33880
(863) 875-6950 (tel)
(863) 875-6955 (fax)
sbernard@taylorlawpl.com
efaniel@taylorlawpl.com
efiling@taylorlawpl.com
asimmons@taylorlawpl.com

Gregory J. Phillips (0070922) (pro hac vice
forthcoming)

Alyssa A. Moscarino (0093847) (pro hac vice
forthcoming)
Alayna K. Bridgett (0100297) (pro hac vice
forthcoming)
BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP
127 Public Square, Suite 4900
Cleveland, Ohio 44114
Telephone: 216.363.4500
Facsimile: 216.363.4588
Email: gphillips@beneschlaw.com
amoscarino@beneschlaw.com
abridgett@beneschlaw.com

*Attorneys for Plaintiffs PT Legon Pari and Logistics
Plus, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2026 a true and correct copy of the foregoing was filed
with the Clerk of Court through the CM/ECF system, and served via U.S. Mail on the following:

GA TELESIS, LLC,
1850 NW 49th Street,
Fort Lauderdale, FL 33309

and

KUEHNE + NAGEL, INC.,
10 Exchange Place,
Jersey City, NJ 07302

Defendants

/s/ Sophia Bernard

Sophia Bernard, Esq.

*Attorney for Plaintiffs PT Legon Pari and Logistics
Plus, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

PT. LEGON PARI, <i>et al.</i>)	CASE NO.:
)	
Plaintiffs,)	JUDGE:
)	
vs.)	
)	
GA TELESIS, LLC, <i>et al.</i>)	
)	
Defendants.)	

DECLARATION OF GREGORY J. PHILLIPS

I, Gregory J. Phillips, declare as follows:

1. I am a Partner at Benesch, Friedlander, Coplan & Aronoff, LLP, and counsel for Plaintiffs PT. Legon Pari and Logistics Plus, Inc. (together, “Plaintiffs”). I am fully familiar with the facts and circumstances set forth herein based on my involvement with this case, my review of files my firm maintains, and my firm’s analysis of relevant social media activity, as reflected herein.

2. During the events underlying this action, PT. Kuehne Nagel Indonesia d/b/a PT. Naku Freight Indonesia’s (“K+N Indonesia”) preferred method of communication with Plaintiffs was via email.

3. Plaintiffs have identified three email addresses that may be used to contact K+N Indonesia, including a general email address that K+N Indonesia maintains: kid.oss@kuehne-nagel.com.

4. Additionally, during the events underlying this matter, Plaintiffs communicated with the following individuals working at K+N Indonesia:

- Jeremy Jeremy – in K+N Indonesia’s Operational Care Control Department at jeremy.jeremy@kuehne-nagel.com; and
- Aprilia Kusuma – at the time, K+N Indonesia’s Gateway & Procurement Specialist at aprilia.kusuma@kuehne-nagel.com.

5. If the Court permits Plaintiffs to serve K+N Indonesia via email, Plaintiffs intend to send copies of the Complaint and all other documents filed in this case to the email addresses listed in Paragraphs 3 and 4 to ensure that they reach K+N Indonesia.

6. Plaintiffs have also identified the following K+N Indonesia employees that appear to maintain active profiles on LinkedIn:

- Ali Fatih Erdogan – Managing Director
- Dominik Kniejski – General Manager, Contract Logistics Indonesia
- Pavan Thalapalli – National Finance Manager
- Tarek Rhlid – Airfreight General Manager
- Kristiani Wijaya – Operational Key Account Manager
- Ossy Yuni Arcan – Customs Supervisor
- Wanda Setyowati – Sea Logistics ISC Customer Care Specialist
- Mario Vrljicak – General Manager Sea Logistics Indonesia
- Fauler Tampubolon – National Project Logistic Customer Excellence Manager
- Verliana Istiqomah – Export Sea Logistics Customer Care Specialist
- Agus Mulyono – General Manager Customs House Brokerage and Trade Control

7. LinkedIn reflects that the following K+N Indonesia employees recently used LinkedIn as follows:

- Ali Fatih Erdogan – liked other LinkedIn posts as recently as January 18, 2026;
- Dominik Kniejski – reposted LinkedIn post on January 13, 2026;

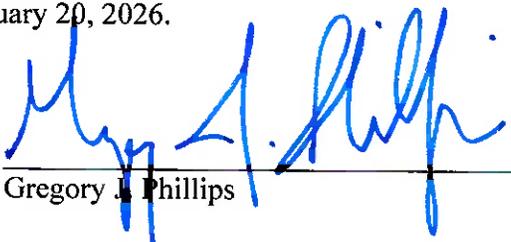
- Pavan Thalapalli – liked other LinkedIn posts and comments as recently as January 14, 2026;
- Tarek Rhlid – liked other LinkedIn posts and comments as recently as January 15, 2026;
- Wanda Setyowati – liked other LinkedIn posts and comments as recently as January 17, 2026;
- Mario Vrljicak – liked other LinkedIn posts and comments as recently as January 18, 2026; and
- Fauler Tampubolon – liked other LinkedIn posts and comments as recently as January 17, 2026.

8. In the event that the Court permits Plaintiffs to serve K+N Indonesia via LinkedIn, Plaintiffs plan to send the Complaint and all other filings to the individuals listed in Paragraph 6 via LinkedIn messenger.

9. In the event that the Court permits Plaintiffs to serve K+N Indonesia via a posting on a designated website, Plaintiffs plan to create a website where they will post copies of the Complaint and all other documents filed in this action.

10. Plaintiffs will send the address for their website to the email addresses listed in Paragraphs 3 and 4 and via LinkedIn messenger to the individuals listed in Paragraph 6.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed in Cleveland, Ohio on January 20, 2026.


Gregory J. Phillips

**IN THE UNITED STATES DISTRICT COURT
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CASE NO.: 0:26-cv-60110-RS

PT. LEGON PARI and)
LOGISTICS PLUS, INC.,)
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Plaintiffs,)
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GA TELESIS, LLC, KUEHNE + NAGEL,)
INC., and PT. KUEHNE NAGEL)
INDONESIA d/b/a PT. NAKU FREIGHT)
INDONESIA,)

Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFFS’ EX PARTE MOTION TO
AUTHORIZE ALTERNATE SERVICE OF PROCESS**

This matter is before the Court on Plaintiffs PT. Legon Pari and Logistics Plus, Inc’s (together, “Plaintiffs”) *Ex Parte* Motion for An Order Authorizing Alternate Service of Process on Defendant PT. Kuehne Nagel Indonesia d/b/a/ PT. Naku Freight Indonesia (“K+N Indonesia”) pursuant to Federal Rule of Civil Procedure 4(f)(3) (“Motion”). Here, the Court finds that Plaintiffs have shown good cause for leave to allow service of the Summons, Complaint, and all future filings in this matter upon K+N Indonesia via email, via LinkedIn, or via posting on a designated website.

Accordingly, after careful review of the Motion, the evidence submitted in support of the motion, and the applicable law, it is **ORDERED AND ADJUDGED** as follows:

1. Plaintiffs’ Motion is **GRANTED**.

2. Plaintiffs shall serve the Summons, Complaint, and all filings in this matter upon K+N Indonesia via email, LinkedIn, or via website posting.
3. Plaintiffs may serve K+N Indonesia via email by using any of the following email addresses:
 - a. kid.oss@kuehne-nagel.com;
 - b. jeremy.jeremy@kuehne-nagel.com; and
 - c. aprilia.kusuma@kuehne-nagel.com.
4. Plaintiffs may also serve K+N Indonesia via LinkedIn by contacting the following K+N Indonesia personnel via LinkedIn messenger:
 - a. Ali Fatih Erdogan – Managing Director
 - b. Dominik Kniejski – General Manager, Contract Logistics Indonesia
 - c. Pavan Thalapalli – National Finance Manager
 - d. Tarek Rhlid – Airfreight General Manager
 - e. Kristiani Wijaya – Operational Key Account Manager
 - f. Ossy Yuni Arcan – Customs Supervisor
 - g. Wanda Setyowati – Sea Logistics ISC Customer Care Specialist
 - h. Mario Vrljicak – General Manager Sea Logistics Indonesia
 - i. Fauler Tampubolon – National Project Logistic Customer Excellence Manager
 - j. Verliana Istiqomah – Export Sea Logistics Customer Care Specialist
 - k. Agus Mulyono – General Manager Customs House Brokerage and Trade Control
5. Plaintiffs may also serve K+N Indonesia via website posting by posting a copy of the Summons, Complaint, and all filings and discovery in this matter on Plaintiffs’ designated website.

DONE AND ORDERED at Fort Lauderdale Florida, this _____ day of _____,
2026.

JUDGE RODNEY SMITH
United States District Judge

Copies furnished:
All counsel of record