

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(WEST PALM BEACH DIVISION)

CASE NO. 09-80480-CIV-HURLEY/HOPKINS  
(Ancillary Proceeding to U.S.D.C. Case No. 08-81565-CIV-HURLEY/HOPKINS)

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| <p>JONATHAN E. PERLMAN, Esq., as court appointed Receiver of Creative Capital Consortium, LLC, et al.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DOROTHY DELISFORT-THEODULE, an individual, WEALTH BUILDERS CIRCLE, LLC, a Georgia limited liability company, CARIBBEAN AIRWAYS, LLC, a Florida limited liability company, DONNA HAVER, INC., a Florida limited liability company, GOOD BUY HOMES, INC., a Florida corporation, INTERNATIONAL DEVELOPMENT ENTREPRENEURS OF AMERICA, INC., a Florida corporation, and COMPLETE AUTO REPAYMENT SOLUTIONS, INC., a Georgia corporation,</p> <p style="text-align: center;">Defendants.</p> <p>_____ /</p> |  |
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**PLAINTIFF'S MOTION TO COMPEL DEPOSITION**  
**TESTIMONY OF DOROTHY DELISFORT**

The Plaintiff, Jonathan E. Perlman, Esq., the court-appointed Receiver (the "Receiver") of Creative Capital Consortium, LLC, A Creative Capital Concept\$, LLC, United Investment Club, LLC, Reverse Auto Loan, LLC, Wealth Builders Circle, LLC, The Dream Makers Capital Investment, LLC, G\$ Trade Financial, Inc. and Unity Entertainment Group, Inc., in accordance with Rule 30 of the Federal Rules of Civil Procedure Rule hereby submits this Motion to Compel the Deposition Testimony of Dorothy Delisfort and states as follows:

1. On March 4, 2010, the Receiver duly served Dorothy Delisfort-Theodule (“Delisfort”) with the Notice of Taking Deposition attached hereto as **Exhibit “A.”**

2. The Notice of Taking Deposition indicates a proposed deposition on March 24, 2010 in Atlanta, Georgia. This date was selected unilaterally by the Receiver after Delisfort failed to respond to numerous requests to provide the Receiver with a mutually convenient date and time for the proposed deposition.

3. On March 23, 2010, Receiver’s counsel received an e-mail from Delisfort indicating that she would not attend the deposition. Furthermore, Delisfort refuses to reschedule the deposition.

4. Although this case is scheduled for trial during April 2010, Delisfort did not file an Answer to the Receiver’s complaint until February 19, 2010. The Receiver requires Delisfort’s deposition testimony to prepare for trial.

WHEREFORE, the Receiver requests that the Court enter an order compelling Delisfort to appear for deposition prior to the commencement of trial in this case.

Dated: March 23, 2010

GENOVESE JOBLOVE & BATTISTA, P.A.  
Attorneys for the Plaintiff  
Bank of America Tower  
100 S.E. Second Street, Suite 4400  
Miami, Florida 33131  
Telephone: (305) 349-2300  
Facsimile: (305) 349-2310

By: /s/ David P. Lemoie .  
DAVID P. LEMOIE  
Florida Bar No. 188311  
[dlemoie@gjb-law.com](mailto:dlemoie@gjb-law.com)  
DAVID C. CIMO  
Florida Bar No. 775400  
[dcimo@gjb-law.com](mailto:dcimo@gjb-law.com)

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2010, the foregoing document was served this day on Dorothy Delisfort-Theodule, 2108 New London Place, Snellville, Georgia by U.S. Mail and by e-mail.

/s/ David Lemoie  
David Lemoie, Esq.  
Florida Bar No. 188311

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
(WEST PALM BEACH DIVISION)

CASE NO. 09-80480-CIV-HURLEY/HOPKINS  
(Ancillary Proceeding to U.S.D.C. Case No. 08-81565-CIV-HURLEY/HOPKINS)

JONATHAN E. PERLMAN, Esq., as court  
appointed Receiver of Creative Capital  
Consortium, LLC, et al.,

Plaintiff,

v.

DOROTHY DELISFORT-THEODULE, an individual,  
WEALTH BUILDERS CIRCLE, LLC, a Georgia  
limited liability company, CARIBBEAN AIRWAYS,  
LLC, a Florida limited liability company, DONNA  
HAVER, INC., a Florida limited liability company,  
GOOD BUY HOMES, INC., a Florida corporation,  
INTERNATIONAL DEVELOPMENT ENTREPRENEURS  
OF AMERICA, INC., a Florida corporation, and  
COMPLETE AUTO REPAYMENT SOLUTIONS, INC.,  
a Georgia corporation,

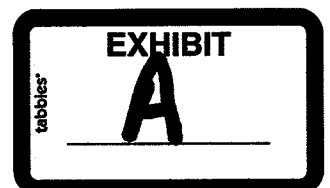
Defendants.

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**NOTICE OF TAKING DEPOSITION**

PLEASE TAKE NOTICE THAT Jonathan E. Perlman, as Court appointed Receiver of Creative Capital Consortium LLC., and A Creative Capital Concepts, LLC, will take the deposition of the individual listed below upon oral examination before a certified court reporter, Notary Public, or any other officer authorized to take depositions in the State of Georgia.

The oral examination will continue from day to day until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Local Rules of the United States District Court for the Southern District of Florida and the Federal Rules of Civil Procedure. If the deponent requires an interpreter, it is the



deponent's responsibility to engage the employment of such interpreter to be present at the deposition. Any objection must be heard prior to the taking of the deposition.

**Deponent:** Dorothy Delisfort-Theodule

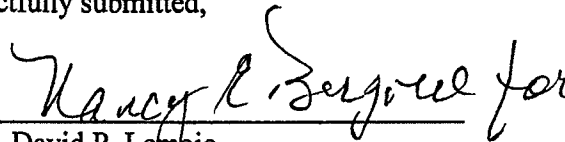
**Date:** Wednesday, March 24, 2010

**Time:** 10:00 AM, EST

**Location:** Esquire Solutions  
2700 Centennial Tower  
101 Marietta Street  
Atlanta, GA 30303

Dated: March 4, 2010  
Miami, Florida

Respectfully submitted,

By: 

David P. Lemboie

Florida Bar No.: 188311

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David C. Cimo

Florida Bar No.: 775400

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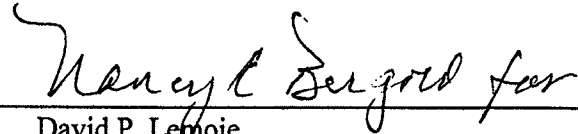
Tel: (305) 349-2300

Fax: (305) 349-2310

Attorneys for Receiver Jonathan E. Perlman, Esq.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by FedEx this 4<sup>th</sup> day of March, 2010, upon: Dorothy Delisfort-Theodule and via e-mail and/or U.S. Mail to the parties listed on the attached service list.



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David P. Lemoie  
Florida Bar No. 188311

**SERVICE LIST**

**JONATHAN E. PERLMAN, ESQ., as court appointed Receiver of Creative Capital Consortium, LLC, et al. v. DOROTHY DELISFORT THEODULE, et al.**  
**CASE NO. 09-80480-CIV-HURLEY/HOPKINS**  
**United States District Court, Southern District of Florida**

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|---|--|
| <p>Dorothy Delisfort (<i>Pro Se</i> Defendant) 2108<br/>                 New London Place Snellville, Georgia</p> <p>Courtesy copy to: Wilmer Parker, Esq.<br/>                 Maloy Jenkins Parker<br/>                 75 14th Street, N.W., 25th Floor<br/>                 Atlanta, GA 30309<br/>                 Telephone: (404) 875-2700<br/>                 Facsimile: (404) 875-8757<br/>                 E-Mail: <a href="mailto:parker@mjplawyers.com">parker@mjplawyers.com</a></p>   | <p>Donna Haver, Inc. c/o Registered Agent<br/>                 George L. Theodule c/o Russell C. Weigel, III,<br/>                 Esq. Russell C. Weigel, III, P.A. 5775 Blue<br/>                 Lagoon Dr., Ste. 100 Miami, Florida 33126<br/>                 Telephone: (786) 888-4567 Facsimile: (786)<br/>                 787-0456 Via e-mail:<br/> <a href="mailto:rweigel@investmentattorneys.com">rweigel@investmentattorneys.com</a> <i>Attorneys<br/>                 for George L. Theodule</i></p> |
| <p>International Development Entrepreneurs<br/>                 of America, Inc.<br/>                 c/o Registered Agent George Theodule<br/>                 c/o Russell C. Weigel, III, Esq.<br/>                 Russell C. Weigel, III, P.A.<br/>                 5775 Blue Lagoon Dr., Ste. 100<br/>                 Miami, Florida 33126<br/>                 Telephone: (786) 888-4567<br/>                 Facsimile: (786) 787-0456<br/>                 Via e-mail: <a href="mailto:rweigel@investmentattorneys.com">rweigel@investmentattorneys.com</a><br/> <i>Attorneys for George L. Theodule</i></p> | <p>Complete Auto Repayment Solutions, Inc.<br/>                 c/o Dorothy Delisfort<br/>                 2108 New London Place<br/>                 Snellville, Georgia</p>  |
| <p>Good Buy Homes, Inc. c/o Registered Agent<br/>                 Yolette T. Williams c/o Barry Michael Wax,<br/>                 Esq. 800 Brickell Avenue, PH II Miami, FL<br/>                 33131 Telephone: (305) 373-4400 Facsimile:<br/>                 (305) 381-7135 Via e-mail:<br/> <a href="mailto:barrywax@bellsouth.net">barrywax@bellsouth.net</a> <i>Attorney for Yollette<br/>                 Williams</i></p>  | <p><b>Via Certified Return Receipt Requested</b><br/>                 Caribbean Airways, LLC c/o Registered Agent<br/>                 Frantz Vilce 10474 Boynton Place Cir., #633<br/>                 Boynton Beach, FL 33437</p>  |