

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

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|---------------------------------------|---|-------------------------------|
| FEDERAL TRADE COMMISSION |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 6:09-cv-2021-ORL-28-KRS |
| v. |) | |
| |) | Judge Antoon |
| JPM ACCELERATED SERVICES INC., |) | |
| IXE ACCELERATED FINANCIAL |) | Magistrate Judge Spaulding |
| CENTERS LLC, |) | |
| IXE ACCELERATED SERVICES INC., |) | |
| IXE ACCELERATED SERVICE CENTERS INC., |) | |
| MGA ACCELERATED SERVICES INC., |) | |
| WORLD CLASS SAVINGS INC., |) | |
| ACCELERATED SAVINGS INC., |) | |
| B&C FINANCIAL GROUP INC., |) | |
| JEANIE B. ROBERTSON, |) | |
| BROOKE ROBERTSON, |) | PLAINTIFF FTC'S |
| IVAN X. ESTRELLA, |) | AGREED MOTION FOR |
| JAIME M. HAWLEY, |) | VOLUNTARY DISMISSAL OF |
| KIMBERLY NELSON, |) | DEFENDANT PAIGE DENT |
| PAIGE DENT, |) | |
| ALEXANDER J. DENT, |) | |
| MICHA S. ROMANO, |) | |
| PAUL PIETRZAK, and |) | |
| ASHLEY M. WESTBROOK, |) | |
| |) | |
| Defendants. |) | |
| |) | |

Plaintiff Federal Trade Commission (the “FTC” or “Commission”), by its undersigned attorney, hereby moves this Court, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, for an order voluntarily dismissing this action as to Defendant Paige Dent. In support of its Motion, the FTC states as follows:

1. The FTC recently submitted two proposed stipulated final judgments and orders for permanent injunctions and other equitable relief (Docket Nos. 88, 88-1 and 88-2, filed November 9, 2010) that would resolve this action as to all of the individual defendants except for Defendant Paige Dent, and a motion for entry of a proposed default judgment and order for permanent injunction and other equitable relief against all of the corporate defendants in this action (Docket No. 89, filed November 9, 2010).

2. Following discussions between counsel for the FTC and counsel for Paige Dent, the FTC hereby requests that the Court enter an order dismissing this action as to Paige Dent, and containing the following provisions:

a. Defendant Paige Dent is voluntarily dismissed, without prejudice, as a defendant in this action;

b. The asset freeze imposed on Defendant Paige Dent by this Court's Amended Preliminary Injunction, dated December 11, 2009 (Docket No. 32), is hereby terminated; and

c. Plaintiff FTC and Defendant Paige Dent shall each bear their own costs and attorneys' fees incurred in this action.

3. Pursuant to Local Rule 3.01(g), the undersigned counsel for the FTC has conferred with opposing counsel about the relief requested herein. Counsel are agreed as to the requested relief.

WHEREFORE, plaintiff FTC respectfully requests that the Court enter an order for voluntary dismissal of this action as to Defendant Paige Dent.

Respectfully submitted,

WILLARD K. TOM
General Counsel

Dated: November 10, 2010

s/ Guy G. Ward _____
Guy G. Ward
Federal Trade Commission
55 W. Monroe Street, Suite 1825
Chicago, Illinois 60603
(312) 960-5612
Fax: (312) 960-5600
gward@ftc.gov

Attorney for Plaintiff
FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2010, I electronically filed the foregoing **Plaintiff FTC's Agreed Motion for Voluntary Dismissal of Defendant Paige Dent** with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all of the attorneys of record. I further certify that I mailed the foregoing document, and the notice of electronic filing, by first-class mail to the following non-CM/ECF participants:

Defendant Kimberly Nelson
Defendant IXE Accelerated Services Inc.
Ocoee, Florida 34761

Defendant Paul Pietrzak
c/o Brian J. Murtha, Esq.
Murtha & Murtha, P.A.
7640 N. Wickham Rd., Ste. 121
Melbourne, FL 32940

Melvia Green
Court-Appointed Mediator
P.O. Box 10412
Tampa, Florida 33679-0412

s/ Guy G. Ward
Guy G. Ward
Attorney for Plaintiff
Federal Trade Commission
55 W. Monroe Street, Suite 1825
Chicago, Illinois 60603
(312) 960-5612
Fax: (312) 960-5600
gward@ftc.gov