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BEFORE THE ARIZONA CORPORATION COMMISSION

2004 FEB 17 P 2:44

COMMISSIONERS

MARC SPITZER, Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
MIKE GLEASON
KRISTIN K. MAYES

AZ CORP COMMISSION
DOCUMENT CONTROL

In the matter of:

WORLDWIDE FOREX, INC.
Steven Labell, Registered Agent
700 North Hiatus Road, Suite 203
Pembroke Pines, Florida 33026

UNIVERSAL FX, INCORPORATED
Darren C. Blum, P.A., Registered Agent
8751 West Broward Boulevard
Plantation, Florida 33324

DAVID BRIDGES
c/o WORLDWIDE FOREX
700 North Hiatus Road, Suite 203
Pembroke Pines, Florida 33026

Respondents.

Docket No. S-03541A-03-0000

MOTION FOR ENTRY OF DEFAULT

Arizona Corporation Commission
DOCKETED

FEB 17 2004

DOCKETED BY *AKC*

The Securities Division ("Division") of the Arizona Corporation Commission ("Commission") requests that the Commission enter an Order of Default against Respondents, who failed to comply with the order of the Hearing Division requiring them to appear through counsel properly admitted in Arizona not later than January 20, 2004. This motion is supported by the record herein and by the following Memorandum of Points and Authorities.

RESPECTFULLY SUBMITTED this 18 day of February, 2004.

ARIZONA CORPORATION COMMISSION
SECURITIES DIVISION

By *Kathleen Coughenour DeLaRosa*
Kathleen Coughenour DeLaRosa
Attorney for Securities Division

1 Ariz. 353, 358-59, 678 P.2d 934, 939-40 (1984) (emphasis added).

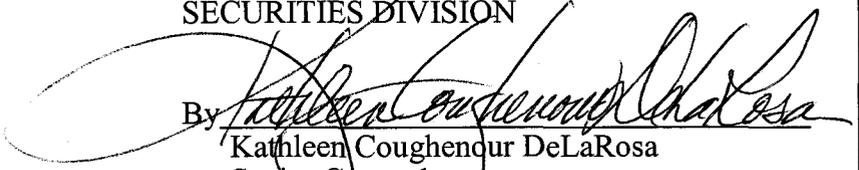
2 Respondents have not even attempted to excuse their failure to comply with the
3 Commission's order to appear through properly admitted counsel. Indeed, "mere carelessness is
4 not sufficient reason to set aside a default judgment." *Daou*, 139 Ariz. at 359, 678 P.2d at 940.
5 The test is "whether the neglect or inadvertence is such as might be the act of a reasonably prudent
6 person under similar circumstances." *Id.* A "party's mere neglect, inadvertence or forgetfulness
7 without any reasonable excuse" will not provide grounds to undo a default judgment. *Sax v.*
8 *Superior Ct., Pima Cty.*, 147 Ariz. 518, 520, 711 P.2d 657, 659 (1985). In this case, an ordinarily
9 prudent person would not have failed to comply with the timeframes and filing requirements set
10 forth in the Commission's order. As a result, the Commission should enter default against these
11 Respondents.

12 **III. CONCLUSION.**

13 For all of the foregoing reasons, and based upon the record herein, the Division requests
14 entry of a default order against the Respondents.

15 RESPECTFULLY SUBMITTED this 18 day of February, 2004.

16 ARIZONA CORPORATION COMMISSION
17 SECURITIES DIVISION

18 By 
19 Kathleen Coughenour DeLaRosa
20 Senior Counsel
21 1300 West Washington, 3rd Floor
22 Phoenix, Arizona 85007
23 Attorney for Securities Division

22 ORIGINAL and 13 copies
23 of the foregoing filed this
24 18 day of February, 2004, with:

24 Docket Control
25 Arizona Corporation Commission
26 1200 West Washington Street
Phoenix, Arizona 85007

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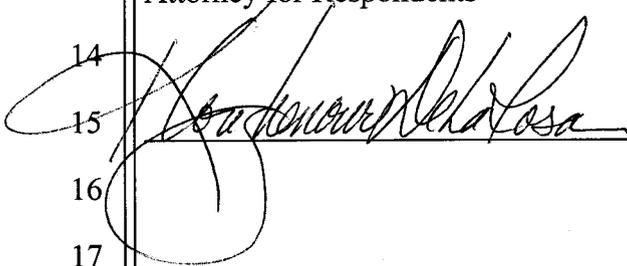
And

COPY of the foregoing mailed/
delivered this 18 day of
February, 2004, to:

Hon. Marc E. Stern
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
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A handwritten signature in black ink, appearing to read "Kenneth J. Dunn", is written over the typed name and address of Kenneth J. Dunn. The signature is written in a cursive style and is positioned above a horizontal line.