


FILED by  D.C.  
 OCT 11 2018  
 STEVEN M. LARIMORE  
 CLERK U. S. DIST. CT.  
 S. D. of FLA. – MIAMI

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Lisa Mollicone, individually )  
similarly situated, )**

**Civil Action No. 17-21468-Civ-Scola**

**Plaintiffs, )**

**v. )**

**Universal Handicraft d/b/a )  
Deep Sea Cosmetics d/b/a )  
Adore Organic Innovations, )  
and others, )**

**Defendants. )**

---

**NOTICE OF OBJECTOR’S, PAMELA SWEENEY PRO SE, RULE 7(1)  
NOTICE; INABILITY TO COMPLY WITH LOCAL RULE 7 (1) AS TO  
REQUIREMENT THAT THE PARTIES MEET AND CONFER  
REGARDING ANY MOTION BEFORE THE COURT AND MOTION FOR  
COSTS INCURRED AS A RESULT**

---

NOW COMES, Pro Se Objector, Pamela Sweeney (“Objector”) and hereby files this notice and motion (“Notice/Motion”) in this matter and in support hereof states as follows:

Local Rule 7.1 provides as follows:

“RULE 7.1 MOTIONS, GENERAL ...

(3) Pre-filing Conferences Required of Counsel. Prior to filing any motion in a civil case, ... counsel for the movant shall confer (orally or in writing), or make reasonable effort to confer (orally or in writing), with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve by agreement the issues to be raised in the motion. Counsel conferring with movant's counsel shall cooperate and act in good faith in attempting to resolve the dispute. At

the end of the motion, and above the signature block, counsel for the moving party shall certify either: (A) that counsel for the movant has conferred with all parties or non-parties who may be affected by 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; or (B) that counsel for the movant has made reasonable efforts to confer with all parties or non-parties who may be affected by the relief sought in the motion, which efforts shall be identified with specificity in the statement (including the date, time, and manner of each effort), but has been unable to do so. If certain of the issues have been resolved by agreement, the certification shall specify the issues so resolved and the issues remaining unresolved. ***Failure to comply with the requirements of this Local Rule may be cause for the Court to grant or deny the motion and impose on counsel an appropriate sanction, which may include an order to pay the amount of the reasonable expenses incurred because of the violation, including a reasonable attorney's fee. See forms available on the Court's website ([www.flsd.uscourts.gov](http://www.flsd.uscourts.gov)) (Emphasis added).***

On September 13, 2018 Objector mailed to the Clerk of this Court her OBJECTOR'/APPELLANT PAMELA SWEENEY'S MOTION TO EXTEND TIME TO PAY APPELLATE FILING FEE ("Motion" see Exhibit "A" attached hereto).

On the same day Objector reached out to Class Counsel and Defense Counsel (collectively "Counsel") with a copy of the Motion. Objector asked for times that Counsel could conduct the required Rule 7 (3) meet and confer (See attached email-Exhibit "B") Neither Counsel responded.

As a result, Objector is not able to disclose to the Court Counsels' position on the Motion. As a result, Objector, pursuant to Rule 7.1 Objector files this required certificates:

**RULE 7.1 CERTIFICATE OF GOOD FAITH CONFERENCE;  
UNABLE TO CONFER**

Pursuant to Local Rule 7.1(a)(3)(B), I hereby certify that Objector the moving party has made reasonable efforts to confer with all parties and non-parties who may be affected by the relief sought in the motion but has been unable to do so. The reasonable efforts made were specifically as follows: see Exhibit "B."

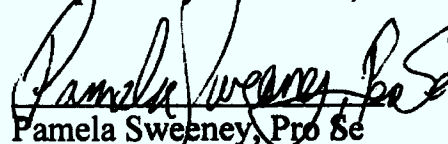
Accordingly Objector hereby moves this Honorable Court to impose sanctions and award Objector reasonable costs for her time involved in making this Motion and the Notice/Motion (See portion of Rule 7 highlighted above.)

**WHEREFORE**, This Objector, for the foregoing reasons, respectfully requests that this Honorable Court:

1. Grant the Objector's Motion;
2. Grant Objector's Notice/Motion;
3. Pursuant to Local Rule 7.1, award Objector's costs incurred for her time in bringing both the Motion and the Notice/Motion.
4. And further enter any such Orders as are necessary and just to require Counsel to respond to Objector's good faith effort to comply with Rule 7.1;and
5. Any and all relief this Honorable Court may find equitable and just.

September 25, 2018

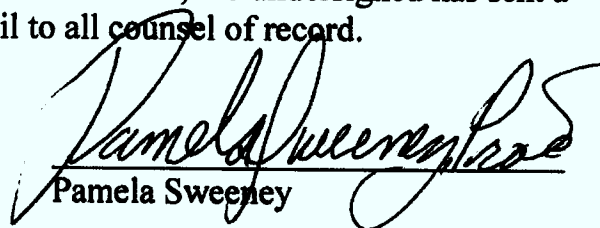
Respectfully submitted,



Pamela Sweeney, Pro Se  
2672 Mutchler Road  
(424)-488-4383  
pam.sweeney1@gmail.com

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2018, I caused to be filed the foregoing with the Clerk of the Court for the Southern District of Florida by sending this document via First Class U.S. Mail to the Clerk. When the Clerk files this document in the docket for this case all parties in this case who use the CM/ECF electronic filing system will be noticed. In addition, the undersigned has sent a copy of the forgoing via electronic mail to all counsel of record.

  
Pamela Sweeney

EXHIBIT

"A"

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

<b>Lisa Mollicone, individually )</b>	
<b>similarly situated, )</b>	<b>Civil Action No. 17-21468-Civ-Scola</b>
)	
<b>Plaintiffs, )</b>	
)	
<b>v. )</b>	
)	
<b>Universal Handicraft d/b/a )</b>	
<b>Deep Sea Cosmetics d/b/a )</b>	
<b>Adore Organic Innovations, )</b>	
<b>and others, )</b>	
)	
<b>Defendants. )</b>	

---

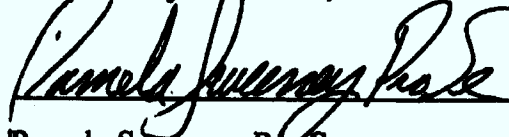
**PRO SE OBJECTOR/APPELLANT PAMELA SWEENEY'S MOTION TO  
EXTEND TIME TO PA APPELLATE FILING FEE**

---

COMES NOW, objector and appellant Pamela Sweeney, Pro Se, ("Objector/Appellant") and respectfully requests this Court grant her Motion to Extend Time to Pay the Appellate Filing Fee. Specifically, Objector/Appellant requests an order granting Objector/Appellant an additional 60 days in which to pay the \$505 appellate filing fee. In support of the Objector/Appellant hereby states that she has fallen on some difficult financial times. Objector/Appellant believes the Appellees will not be negatively affected by this motion being granted as it does nothing substantive (as opposed to procedural) to harm the position of the Appellees.

Counsels in this case have been properly notified of this request. Objector/Appellant awaits their position on this Motion.

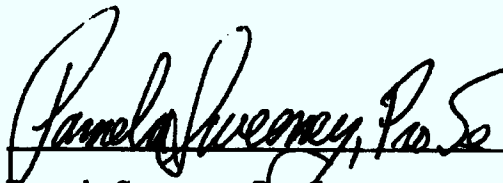
Respectfully submitted,



Pamela Sweeney, Pro Se  
*Objector/Appellant*  
2672 Mutchler Road  
Madison, WI 53711  
Telephone: (424)-488-4383  
*Pam.sweeney1@gmail.com*

### CERTIFICATE OF SERVICE

This is to certify that on 13th day of September 2018, I have caused to be file a copy of this Motion to Extend Time to Pay the Appellate Filing Fee by mailing it to the Clerk via First Class United States Mail. When the Clerk scans this Motion into the CM/ECF filing systems it will immediately be served on all Counsel of Record. In addition all Counsel of Record have been served by electronic mail.



Pamela Sweeney, Pro Se

EXHIBIT  
" B "





Pam Sweeney <pam.sweeney1@gmail.com>

---

## Adore Notice of Appeal

6 messages

---

**Pam Sweeney** <pam.sweeney1@gmail.com>

Fri, Aug 24, 2018 at 2:25 PM

To: ron@consumersadvocates.com, slatham@cozen.com

Bcc: Pam Sweeney <pam.sweeney1@gmail.com>, Patrick Sweeney <patrickshanesweeney@gmail.com>

Dear Counsel:

Please find attached a NOA which addresses all of the "Amended " Judgments.

Let me know if you have any questions.

Regards

Pam Sweeney

---

 20180824141505.pdf  
105K

---

**Pam Sweeney** <pam.sweeney1@gmail.com>

Mon, Aug 27, 2018 at 8:17 PM

To: ron@consumersadvocates.com, slatham@cozen.com

Good Evening

I am reaching out to inquire if either of you were interested in privately mediating this appeal.

Please let me know.

Thank you. Regards,

Pam Sweeney

[Quoted text hidden]

---

**Pam Sweeney** <pam.sweeney1@gmail.com>

Tue, Sep 4, 2018 at 6:25 PM

To: ron@consumersadvocates.com, slatham@cozen.com

Bcc: Patrick Sweeney <patrickshanesweeney@gmail.com>, Pam Sweeney <pam.sweeney1@gmail.com>

Dear Counsel

Please find attached my Transcript Order Information Sheet which was mailed to the clerk today.

If you have any questions I can be reached via email or by phone at 424-488-4383.

Thank you.

Pam Sweeney

On Fri, Aug 24, 2018 at 2:25 PM Pam Sweeney <pam.sweeney1@gmail.com> wrote:

[Quoted text hidden]

---

 20180904181627.pdf  
116K

---

**Pam Sweeney** <pam.sweeney1@gmail.com>

Tue, Sep 4, 2018 at 6:38 PM

To: ron@consumersadvocates.com, slatham@cozen.com

Bcc: Patrick Sweeney <patrickshanesweeney@gmail.com>, Pam Sweeney <pam.sweeney1@gmail.com>

Correction: The Transcript Order Information Sheet was mailed to BOTH the 11th Circuit and the Southern District of Florida.

Thank you.

Pam Sweeney

On Fri, Aug 24, 2018 at 2:25 PM Pam Sweeney <pam.sweeney1@gmail.com> wrote:


[Quoted text hidden]

**Pam Sweeney** <pam.sweeney1@gmail.com> Thu, Sep 13, 2018 at 6:03 PM  
To: ron@consumersadvocates.com, slatham@cozen.com  
Bcc: Patrick Sweeney <patrickshanesweeney@gmail.com>, pamela sachtjen <pamelasachtjen@gmail.com>

Dear Counsel  
Please see attached which is being mailed today.  
Please contact me if you have an questions.  
Thank you.  
Regards .  
Pam Sweeney

On Fri, Aug 24, 2018 at 2:25 PM Pam Sweeney <pam.sweeney1@gmail.com> wrote:  
[Quoted text hidden]

---

 20180913174627.pdf  
172K


---

**Pam Sweeney** <pam.sweeney1@gmail.com> Thu, Sep 13, 2018 at 6:39 PM  
To: ron@consumersadvocates.com, slatham@cozen.com  
Bcc: Patrick Sweeney <patrickshanesweeney@gmail.com>, Pam Sweeney <pam.sweeney1@gmail.com>, pamela sachtjen <pamelasachtjen@gmail.com>

Dear Counsel  
Please find attached a Motion to Extend Time to Pay Appellate Filing Fee.  
  
Please everybody email me good times to conduct a comprehensive meet and confer.  
  
I thank you for your attention t this matter.  
Regards  
Pam Sweeney

On Fri, Aug 24, 2018 at 2:25 PM Pam Sweeney <pam.sweeney1@gmail.com> wrote:  
[Quoted text hidden]

---

 20180913183154.pdf  
80K

*Switzer*  
2872 MORTCHER RD  
MADISON, WI 53711

*ADORE MORTCHER*

**USMS  
INSPECTED**

MILWAUKEE  
WI 532  
28 SEP 18

*CLARK OF THE ORDER*

*USDC SOUTHERN FLA.  
WILKIE D. FERLUSON ESQ.  
400 NORTH MIAMI AVE  
MIAMI, FL 33128*

*Robert Brown  
33128  
MIAMI 33128*