Jeremy A. Sitcoff, Colo. Bar No. 29393 ROBERTS LEVIN ROSENBERG PC 1660 Wynkoop Street, Suite 800 Denver, CO 80202 (303) 575-9390 (303) 575-9385 (fax) jas@robertslevin.com

## IN THE UNITED STATES DISTRICT COURT FOR THE STATE OF ARIZONA

DAVID L. WOODARD,

No. MC 04-78-PHX-MHM

Plaintiff

VS

APPLICATION FOR WRIT OF GARNISHMENT OF EARNINGS

DINO J. DELAPORTAS,
WILLIAM S. RAPTIS,
STEVEN H. DELAPORTAS,
CEE & GEE FUNDING, INC.,
Also d/b/a TLD FUNDING
HIGHLANDER SPECIALTY FOODS, LLC,

Defendants.

**Applicant States:** 

1. Applicant is a party in an action to whom a money judgment has been awarded.

- 2. Applicant has made a demand on the Judgment Debtor for payment of the amount adjudged due, but the Judgment Debtor has not paid that amount, nor has the Judgment Debtor agreed and continued to pay the nonexempt portion of his wages until the judgment is satisfied.
- 3. On the date of this Application, Judgment Debtor owes \$1,804,470.50 plus interest in the amount of \$282,576.60 for a total of \$2,087,047.10 on the outstanding balance of the judgment.
- 4. The Garnishee is believed to be an employer of the Judgment Debtor or otherwise owes or will owe to the Judgment Debtor disposable earnings.

	Fortitude Entertainment Group 4831 N. 11 <sup>th</sup> St. Phoenix, AZ 85014
6.	(Check One)
	(X_) The Judgment Creditor has not received notice of Steven J. Delaportas' intent to enter into an agreement for debt scheduling with a qualified debt counseling organization.
	() The Judgment Creditor has received notice of Steven J. Delaportas' intent to enter into an agreement for debt scheduling with a qualified debt counseling organization and Judgment Creditor has timely objected to Steven J Delaportas' participation in such an agreement.
	() The Judgment Creditor has received notice of Steven J. Delaportas' intent to enter into an agreement for debt scheduling with a qualified debt counseling organization but Judgment Creditor has been notified that the agreement is no longer valid.
7.	The address for the Judgment Creditor or his authorized agent is
	ROBERTS LEVIN ROSENBERG PC 1660 Wynkoop St., Ste. 800 Denver, CO 80202
	HEREFORE, affiant requests issuance of a Writ of Garnishment ninst Garnishee.
Da	July 6, 2007
Juc	igment <b>befft</b> or or Agent
ST	ATE OF COLORADO ) ss.
Co	unty of Denver )
	SUSCRIBED AND SWORN this date: 7/6/07
	1/31/09
	Notary Expiration Date Notary Public
	CLAUDIA A. COOPER NOTARY PUBLIC STATE OF COLORADO

5. The name and address of the Garnishee or his authorized agent is: