FILED by ____ D.C.
SEP 25 2012
STEVEN M. LARIMORE
CLERK U. S. DIST. CT.
S. D. of FLA. - MIAMI

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

WEST PALM BEECH DIVISION

Case No. 11-81404-CIV-SEITZ/SIMOTON

COUPLING, SOLUTIONS LLC, a business

Entity organized under the Laws of the

State of Florida

Plaintiff

VS

PAUL ANTHONY DAVIDSON

Defendant

REPLY TO PLAINTIFFS RESPONSE TO DEFENDANTS MOTION FOR DISCLOSURE

Defendant Paul Anthony Davidson acting in person replies to the Coupling Solutions ("plaintiff") motion to strike out Pleadings and Enter Default (DKt. No. 80) and states as that the Council for the Plaintiff have:--

1. Not identified what they want to achieve by this action, which makes a mediator's job very difficult, and the defendants position impossible. Proving negatives is difficult, and making an argument is impossible when you don't know what you are arguing over. Trying to convince a third party such as a mediator, albeit not a certified mediator, would be somewhat difficult.

2. Not replied or acknowledged various requests for information, documentation and disclosure of case related papers, also making mediation impossible

3. Not answered direct questions relating to mediation from Paul Davidson ("defendant") including "Can we use video mediation or conference call?" until now, saying it is simply not allowed

4. Not taken into account my inability to obtain a visa and the difficulty that this puts me in, in relation to these proceedings.

5. Not supplied a mediator that is certified. By his own admission he is not.

6. Not suggested a way forward that suits both parties

7. Not played fair and used the process to attempt to strike out and obtain a default order with a cost against the defendant that he was not aware of or how the process works until recently.

8. Not acted fair in supplying/suggesting an alternative way forward with their vast knowledge of the Florida legal system a hearing with paper/summary judgment due to the ("Defendant") Paul Davidson's visa position

8. Not supplied case law that relates to the defendant's circumstances. The only case law supplied which I have read relates to person/persons who have used disability and means as an excuse to not attend. All cases....." which there are many" all were defeated/found against on the basis if there is a will there will be a way. In the defendants ("Paul Davidson") case there is the will but there is no way.

9. Not supplied any evidence that the Defendant (Paul Davidson) ...."was *fleeing* the Sothern State of Florida" or indeed was not in the Bahamas and/or Victoria vacationing.

10) Not supplied or acknowledged the frequent requests for information/documentation to the court

The plaintiff's attorneys have deliberately ignored any request from the defendant (Paul Davidson) for information. They have been disingenuous about the defendant (Paul Davidson) for example "fleeing the District of Southern Florida" The only way the defendant (Paul Davidson) found out his ESTA (visa) was withdrawn was when he tried to re-enter the USA. This is a fact and can be proven. The Plaintiff's attorneys are disingenuous when suggesting that the defendant (Paul Davidson) is not traveling to the Bahamas and Victoria, British Columbia. A copy of the relevant pages of the defendant's passport will be available for examination at any time should the court, or the plaintiff, require a certified copy. Please arrange an appointment with a notary republic in the Bahamas and I will take the passport in for copying and notarizing.

RELIEF SOUGHT

Given the Plaintiff's refusal to tell the defendant and/or the court what they want, failing to supply documents and/or to even acknowledge that they have been asked on a number of occasions, their misleading of the court by suggesting that the defendant (Paul Davidson) fled the USA to avoid mediation and/or these proceedings without offering any proof, further suggesting without any proof that the Defendant (Paul Davidson) was not where he stated he was. The officers of the company, particularly Blake Stephenson, are paying/bringing these vexatious and unfounded proceedings through a company of straw, Coupling Solutions (the Plaintiff) which has no possibility of paying what, if any, order the courts make. The defendant (Paul Davidson) seeks an "Unless Order".

a. Unless the Plaintiff delivers to the Defendant (Paul Davidson) all the documents requested by Friday the 21st of September 2012 a default judgment in favor of the Defendant (Paul Davidson) and,

b. Awarding attorneys' fees in an amount to be determined and,

c. Award damages in relation to loss of status in the community, and cost for time spent on the proceedings; amount to be determined and,

d. Join the participating parties together, joint and severally in relation to liability and,

d. Compel the Plaintiff (Coupling Solutions LLC) joint and severally with the officers of the company to complete the deal/transaction as highlighted in the manuscript note and the offer of $15,000,000 in the e-mail to Stephen Conn a director of Coupling Technology Ltd.

Dated: September 19, 2012.

Paul A. Davidson
404-1630 Quadra Street
Victoria, BC
V8W 3J5
CANADA
Telephone: 250-294-6787
Mobile: 250-686-7977

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2012, pursuant to the parties' agreement concerning electronic service of discovery, a true and correct copy has been sent by e-mail transmission to all counsel of record on the service list below.

/s/Paul A. Davidson
Paul A. Davidson

SERVICE LIST

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