

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

COMERICA BANK,
a Texas banking association,

CASE NO. 11-028447 (03)

Plaintiff,

vs.

OCEAN 4660, LLC a Florida limited liability
company, OCEANSIDE LAUDERDALE,
INC., a Florida corporation, KENNETH A.
FRANK, individually, ANGELA DIPILATO,
individually, TOWN OF LAUDERDALE-
BY-THE-SEA, a political subdivision of the
State of Florida, WASTE MANAGEMENT
INC. OF FLORIDA d/b/a SOUTHERN
SANITATION SERVICE, a Florida
corporation, AFFINITY MECHANICAL
INC., a Florida corporation, and BROWARD
COUNTY, a political subdivision of the State
of Florida,

Defendants.

NOTICE OF HEARING

**"THIS HEARING WAS SCHEDULED USING THE
ONLINE CALENDAR SCHEDULING SYSTEM"**

YOU ARE HEREBY NOTIFIED that we shall call up for hearing before the
Honorable Mily Rodriguez Powell, one of the judges of the above-styled Court, in his
Chambers at the **Broward County Courthouse, 201 Southeast Sixth Street, Room 998, Fort
Lauderdale, Florida 33301**, on **Monday, November 26, 2012 at 8:45 a.m.**, or as soon
thereafter as we may be heard:

**PLAINTIFF'S MOTION TO COMPEL BETTER ANSWERS AND
RESPONSES FROM DEFENDANT KENNETH A. FRANK**

and

**DEFENDANT OCEANSIDE LAUDERDALE, INC AND KENNETH FRANK'S MOTION
TO DISQUALIFY PLAINTIFF'S COUNSEL, STAY PROCEEDINGS AND FOR
SANCTIONS WITH INCORPORATED MEMORANDUM OF LAW**

PLEASE BE GOVERNED ACCORDINGLY.

CERTIFICATE OF GOOD FAITH

I hereby certify that I have made a good faith attempt to resolve this matter prior to my noticing this motion for hearing, and the issues before the Court may be heard and resolved by the court within five (5) minutes.

IMPORTANT

"If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Room 470, 201 S.E. Sixth Street, Fort Lauderdale, Florida 33301, 954-831-7721 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711"

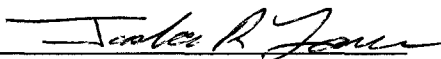
Holland & Knight LLP

Counsel for Plaintiff

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By: 

Brian K. Hole

Florida Bar No.: 0019968

Nicole C. Velasco

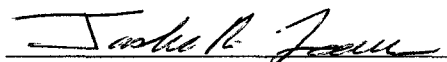
Florida Bar No.: 0028585

Joshua R. Levenson

Florida Bar No.: 0056208

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of November, 2012, a copy of the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Service List below in the authorized manner specified.




Joshua R. Levenson

Florida Bar No.: 0056208

SERVICE LIST

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Motion Elevator, Inc. c/o Registered Agent, Rose Portelli 5915 Park Drive Margate, FL 33063 By regular U.S. Mail	Michal Holovka 1261 S.E. 7th Avenue Pompano Beach, FL 33060 By regular U.S. Mail
Euro Fist Choice Enterprises, Inc. c/o Registered Agent, Michal Holovka 1261 S.E. 7 th Avenue Pompano Beach, FL 33060 By regular U.S. Mail	

 17th Judicial Circuit	
Case Schedule Receipt:	
Sequence Number:	7
Judge Name:	Rodriguez-Powell, Mily
Case Number:	CACE11028447
Schedule Date:	11/26/2012
Scheduling Attorney Name:	Nicole, Christine, Velasco
Motion Title:	1. Plaintiff's Motion to Compel Better Answers and Responses From Defendant Kenneth A. Frank; and 2. Defendant Oceanside Lauderdale, Inc. and Kenneth Frank's Motion to Disqualify Plaintiff's Counsel, Stay Proceedings and for Sanctions with Incorporated Memorandum of Law
Case Entry Date:	Tue Oct 30 10:01:37 EDT 2012
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