

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.

PLAINTIFF'S MOTION FOR CLERK'S DEFAULT

Plaintiff Comerica Bank, moves for entry of a Default by the Clerk against Defendant **WASTE MANAGEMENT INC. OF FLORIDA d/b/a SOUTHERN SANITATION SERVICE** for failure to serve any papers on the undersigned or file any papers as required by law.

WE HEREBY CERTIFY that no paper from **WASTE MANAGEMENT INC. OF FLORIDA d/b/a SOUTHERN SANITATION SERVICE** has been filed or served on the Plaintiff's attorney prior to the time of filing this Motion for Clerk's Default.

Dated: December 9, 2011.

HOLLAND & KNIGHT LLP
Counsel for Plaintiff
515 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
954-525-1000 (telephone)
954-463-2030 (fax)

By: 

Brian K. Hole
Florida Bar No. 0019968
Nicole C. Velasco
Florida Bar No. 0028585

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Defendants.

_____ /

DEFAULT

A default is entered in this action against Defendant **WASTE MANAGEMENT INC. OF
FLORIDA d/b/a SOUTHERN SANITATION SERVICE** for failure to serve or file any papers in this action
as required by law.

HOWARD C. FORMAN
Clerk of Court

Dated: _____

By: _____
Deputy Clerk

Copies furnished:

Brian K. Hole, Esq.
Holland & Knight LLP
515 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301

Oceanside Lauderdale, Inc.
c/o Edward J. Bender, Registered Agent
2805 E. Oakland Park Boulevard, #144
Fort Lauderdale, FL 33306
Kenneth A. Frank
2310 East Atlantic Boulevard, Suite 206
Pompano Beach, FL 33062

Town of Lauderdale-By-The-Sea
c/o Mayor Roseann Minnet
4501 Ocean Drive
Lauderdale-By-The-Sea, FL 33308

Waste Management of Florida d/b/a Southern Sanitation Service
c/o Registered Agent, CT Corporation System
1200 South Pine Island Road
Plantation, FL 33324

Affinity Mechanical Inc.
c/o Edward J. Bender, Registered Agent
2805 E. Oakland Park Boulevard, #144
Fort Lauderdale, FL 33306

Broward County
c/o Mayor John E. Rodstrom, Jr.
Broward County Commission Offices
115 S. Andrews Avenue
Room 421
Fort Lauderdale, FL 33301