

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 ON AMENDED COMPLAINT

Plaintiff Comerica Bank, moves for entry of a Default by the Clerk against Defendant,
MOTION ELEVATOR, INC., on the Amended Complaint, for failure to serve any papers on the
undersigned or file any papers as required by law.

WE HEREBY CERTIFY that no paper from **MOTION ELEVATOR, INC.** has been filed or
served on the Plaintiff's attorney prior to the time of filing this Motion for Clerk's Default.

Dated: May 17, 2012.

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

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 17th day of May, 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 by U.S. Mail.



Brian K. Hole
Florida Bar No. 0019968

SERVICE LIST

Krystol L. Rappuhn, Esq. 55 E. Long Lake Road, Suite 204 Troy, Michigan 48085-4738 <i>Co-Counsel for Ocean 4660, LLC</i>	Michael Tobin, Esq. Rothman & Tobin, P.A. 11900 Biscayne Boulevard, Suite 740 Miami, Florida 33181 <i>Co- Counsel for Ocean 4660, LLC</i>
Eduardo M. Soto, Esq. Weiss Serota Helfman Pastoriza Cole & Boniske, P.L. 2525 Ponce de Leon Blvd., Suite 700 Coral Gables, FL 33134 <i>Counsel for Town of Lauderdale-By-The-Sea</i>	Maya A. Moore, Esq. Joni Armstrong Coffey, Esq. County Attorney for Broward County Office of the County Attorney Governmental Center, Suite 423 115 South Andrews Avenue Fort Lauderdale, FL 33301 <i>Counsel for Broward County</i>
Oceanside Lauderdale, Inc. 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062	Kenneth A. Frank 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062
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
Angela Dipilato 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062	Angela Dipilato 1323 S.E. 3rd Avenue Pompano Beach, FL 33060

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

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.

DEFAULT ON AMENDED COMPLAINT

A default is entered in this action against Defendant, **MOTION ELEVATOR, INC.**, on the
Amended Complaint, 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	
---	--

<p>Krystol L. Rappuhn, Esq. 55 E. Long Lake Road, Suite 204 Troy, Michigan 48085-4738 <i>Co-Counsel for Ocean 4660, LLC</i></p>	<p>Michael Tobin, Esq. Rothman & Tobin, P.A. 11900 Biscayne Boulevard, Suite 740 Miami, Florida 33181 <i>Co- Counsel for Ocean 4660, LLC</i></p>
<p>Eduardo M. Soto, Esq. Weiss Serota Helfman Pastoriza Cole & Boniske, P.L. 2525 Ponce de Leon Blvd., Suite 700 Coral Gables, FL 33134 <i>Counsel for Town of Lauderdale-By-The-Sea</i></p>	<p>Maya A. Moore, Esq. Joni Armstrong Coffey, Esq. County Attorney for Broward County Office of the County Attorney Governmental Center, Suite 423 115 South Andrews Avenue Fort Lauderdale, FL 33301 <i>Counsel for Broward County</i></p>
<p>Oceanside Lauderdale, Inc. 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062</p>	<p>Kenneth A. Frank 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062</p>
<p>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</p>	<p>Affinity Mechanical Inc. c/o Edward J. Bender, Registered Agent 2805 E. Oakland Park Boulevard, #144 Fort Lauderdale, FL 33306</p>
<p>Angela Dipilato 2310 East Atlantic Boulevard, Suite 206 Pompano Beach, FL 33062</p>	<p>Angela Dipilato 1323 S.E. 3rd Avenue Pompano Beach, FL 33060</p>
<p>Motion Elevator, Inc. c/o Registered Agent, Rose Portelli 5915 Park Drive Margate, FL 33063</p>	<p>Rose Portelli 5915 Park Drive Margate, FL 33063</p>
<p>Euro Fist Choice Enterprises, Inc. c/o Registered Agent, Michal Holovka 1261 S.E. 7th Avenue Pompano Beach, FL 33060</p>	<p>Michal Holovka 1261 S.E. 7th Avenue Pompano Beach, FL 33060</p>