

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, et al.,

Defendants.

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**PLAINTIFF'S MOTION FOR CLERK'S  
DEFAULT ON SECOND AMENDED COMPLAINT**

Plaintiff Comerica Bank, moves for entry of a Default by the Clerk against Defendant, **EURO FIRST CHOICE ENTERPRISES, INC.**, on the Second 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 **EURO FIRST CHOICE ENTERPRISES, INC.** has been filed or served on the Plaintiff's attorney prior to the time of filing this Motion for Clerk's Default.

Dated: June 20, 2012.

HOLLAND & KNIGHT LLP  
Counsel for Plaintiff  
515 East Las Olas Boulevard, Suite 1200  
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By: 

Brian K. Hole  
Florida Bar No. 0019968  
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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.

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**DEFAULT ON SECOND AMENDED COMPLAINT**

A default is entered in this action against Defendant, **EURO FIRST CHOICE ENTERPRISES, INC.**, on the Second 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	
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<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 &amp; Tobin, P.A.  11900 Biscayne Boulevard, Suite 740  Miami, Florida 33181  <i>Co- Counsel for Ocean 4660, LLC and  Counsel for Hanna Karcho-Polselli, and Remo  Polselli</i></p>
<p>Eduardo M. Soto, Esq.  Weiss Serota Helfman Pastoriza Cole &amp;  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 First Choice Enterprises, Inc.  c/o Registered Agent, Michal Holovka  1261 S.E. 7<sup>th</sup> Avenue  Pompano Beach, FL 33060</p>	<p>Michal Holovka  1261 S.E. 7th Avenue  Pompano Beach, FL 33060</p>