

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 SECOND AMENDED COMPLAINT**

Plaintiff Comerica Bank, moves for entry of a Default by the Clerk against Defendant,
MICHAL HOLOVKA, 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 **MICHAL HOLOVKA** 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
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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_____ /

DEFAULT ON SECOND AMENDED COMPLAINT

A default is entered in this action against Defendant, **MICHAL HOLOVKA**, 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 & 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 & 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. 7th Avenue Pompano Beach, FL 33060</p>	<p>Michal Holovka 1261 S.E. 7th Avenue Pompano Beach, FL 33060</p>