

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.

IN THE CIRCUIT COURT FLORIDA
FOURTH JUDICIAL CIRCUIT, IN AND
FOR DUVAL COUNTY, FLORIDA

CASE NO.: 2010-CA-000177
DIVISION: F

MAYSEO BROCK,

Plaintiffs,

v.

WINN-DIXIE STORES, INC.

Defendant.

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT PURSUANT TO FLA. R. CIV. P.
1.500(b)

Plaintiff, Mayseo Brock, ("Plaintiff-Brock"), by counsel, requests this Court for an Order granting Plaintiff-Brock judgment in his favor pursuant to Fla. R. Civ. P. 1.500(b) and as grounds states as follows:

1. On October 19, 2010, the undersigned filed a Complaint for Plaintiff- Brock against Winn-Dixie Stores, Inc. ("Winn-Dixie"), alleging, among other things, Winn-Dixie discriminated against Plaintiff- Brock on the basis of his African American race, retaliation for complaining of Winn-Dixie's discriminatory conduct towards him and his co-worker, Plaintiff- Terrence Ivy, and maintenance of a hostile work environment .
2. On October 28, 2010, a Return of Service was filed [Document 6], stating that on October 26, 2010, the Defendant, Winn-Dixie Stores, Inc., ("Winn-Dixie") had been serviced with the Plaintiffs' Complaint.
3. On November 30, 2010, Winn-Dixie, by its counsel, Bradley Johnson, Esq. and Latasha Garrison-Fullwood, Esq. filed a Motion to Sever and for More Definite

Statement, [Document 7]. On February 14, 2011, the Court entered an Order granting Winn-Dixie's Motion to Sever, [Document 16].

4. On June 8, 2011, Plaintiff–Brock filed a Motion to Correct Order [Document 29], Motion to Withdraw as Attorney of Record for Plaintiff Gregory Brown [Document 30], and a Motion for Extension of Time to File Plaintiff's First Amended Complaint, [Document 31].
5. On or around June 8, 2011, the three (3) motions and Plaintiff's First Amended Complaint were served on Winn-Dixie, through its counsel, Bradley Johnson, Esq., and Latasha Garrison-Fullwood, Esq.
6. On August 2, 2011, the Court entered an Order [Document #37], granting Plaintiff-Brock's motion to file his amended complaint out of time. Pursuant to the Order Plaintiff- Brock's amended complaint was filed August 2, 2011.
7. Since August 2, 2011, Winn-Dixie has failed to file any responsive pleading in this cause in violation of Fla. R. Civ. P. 1.140 and its defenses are deemed waived.

WHEREFORE, based on the foregoing, Plaintiff-Brock, by the undersigned, respectfully requests this Court enter an Order as follows:

- a) granting Plaintiff-Brock judgment against the Defendant; and
- b) damages to be determined at an evidentiary hearing; and
- c) attorney's fees and costs; and
- d) for any other relief, either at law or equity, to which Plaintiff- Brock is entitled.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Plaintiff's Motion for Default Judgment Pursuant To Fla. R. Civ. P. 1.500(b) has been served upon Latasha Garrison-Fullwood, Esq.,

Taylor, Day, Currie, Boyd & Johnson, by U.S. Mail at 50 N. Laura Street, Suite 3500, Jacksonville, Florida 32202 and by electronic mail at lgf@tdclaw.com this 29TH day of November, 2012.

Respectfully Submitted,

/s/Lisa Lovingood Kelly

Lisa Lovingood Kelly, Esq.

Attorney for Plaintiff- Brock

The Kelly Law Firm

Fla. Bar No. 884250

14286-19 Beach Blvd. #404

Jacksonville, FL 32250-1568

Telephone: (904) 322-8596

Facsimile: (904) 223-8634

Email: llkelly@kellylawforyou.com

BUY™

SELL™

SHOP™



Downloaded From
www.TextBookDiscrimination.com



SELL YOUR OWN SAMPLES

(help others get the justice that they deserve)



BUY™

SELL™

SHOP™

www.TextBookDiscrimination.com

Get ***Booked Up*** on Justice!

© TBD Corporation. All Rights Reserved.