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

CORDANA MORGAN

CASE NO.: 2012-CA-13601

Plaintiff,

DIVISION: CV-F

vs.

LOREN Z. CLAYMAN, M.D., an individual,
ELANA CLAYMAN, an individual, and
LOREN Z. CLAYMAN, M.D., P.A.,
a Florida corporation

Defendants.

MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff, CORDANA MORGAN, by and through the undersigned attorney, moves for entry of a default judgment against the Defendants, LOREN Z. CLAYMAN, M.D. an individual, ELANA CLAYMAN, an individual, and LOREN Z. CLAYMAN, M.D., P.A., a Florida Corporation. Defendants have failed to serve any responsive pleading as required by law in the above-styled case. On March 19, 2013, Defendants admitted service of process, and filed a motion with this Court, requesting a sixty day extension in which to hire counsel to represent them. Following the filing of the March 19, 2013 motion, the Clerk notified the Court that a default had been incorrectly entered, based on the Defendants' filing of the March 19, 2013 motion. The Court vacated the default on April 26, 2013.

More than sixty days have now expired since the Defendants' filing of their March 19, 2013 motion. No attorney has made an appearance in this case and no responsive pleading has

been filed. Plaintiff respectfully requests the Court enter judgment against each defendant, jointly and severally, and that the Court schedule a hearing to determine the amount of damages, attorney's fees, and costs to be awarded to Plaintiff.

Respectfully submitted,

DELEGAL LAW OFFICES, P.A.

_____/s/ Tad Delegal

T.A. Delegal, III, Esq.

Florida Bar No. 0892701

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424 E. Monroe Street

Jacksonville, FL 32202

Telephone: (904) 633-5000

Facsimile: (904) 358-2850

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U.S. Mail to Loren Z. Clayman, M.D. and Elana E. Clayman, M.D., 4152 Alhambra Drive West, Jacksonville, Florida 32207, and Loren Z. Clayman, M.D., registered agent at Loren Z. Clayman, M.D., P.A., 1801 Barrs St, #200, Jacksonville, FL 32204, on this 19th day of June, 2013.

DELEGAL LAW OFFICES, P.A.

_____/S/ Tad Delegal_____
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