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

Case No.: 2018-CC-015037
Div.: CC-J

CHANCE OLEVIA LLC, a foreign limited liability
company,

Plaintiff,

vs.

UNKNOWN PERSON (1) IN POSSESSION, an
individual,

Defendant.

PLAINTIFF'S MOTION FOR FINAL JUDGMENT AFTER DEFAULT

Plaintiff, CHANCE OLEVIA LLC, by and through its undersigned attorneys and pursuant to Rule 1.500(e), Florida Rules of Civil Procedure, moves for entry of a final judgment after default in its favor and against Defendant, UNKNOWN PERSON (1) IN POSSESSION n/k/a Debra McGill, and as grounds therefore states as follows:

1. This is an action to recover possession of certain residential real property unlawfully detained by the Defendant.
2. On October 29, 2018, Debra McGill was served with process. A copy of the Return of Service is attached hereto as Exhibit "A."
3. On November 6, 2018, a default was entered by the Clerk against Debra McGill. A copy of the default is attached hereto as Exhibit "B."
4. "The effect of a default is that the defaulting party admits all well plead allegations of the complaint." *Freeman v. Freeman*, 447 So.2d 963, 964 (Fla. 1st DCA 1984).

5. By defaulting and thus admitting the allegations of the Complaint, Plaintiff is entitled to possession of the property.

WHEREFORE, CHANCE OLEVIA LLC, requests that this Court enter a final judgment after default on the Complaint in its favor and against Defendant, UNKNOWN PERSON (1) IN POSSESSION n/k/a Debra McGill, along with an Order instructing the Clerk of Court to issue a Writ of Possession in favor of CHANCE OLEVIA LLC, for the property.

DATED this 7th day of November, 2018.

ROGERS TOWERS, P.A.

By: /s/ Gabriel B. Crafton

Gabriel B. Crafton, Esquire
Florida Bar No. 058423
1301 Riverplace Blvd, Ste. 1500
Jacksonville, Florida 32207
Telephone: (904) 398-3911
Facsimile: (904) 396-0663

Primary and Secondary Email Addresses:

gcrafton@rtlaw.com
jbates@rtlaw.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been furnished by U.S Mail on this 7th day of November, 2018, to the following:

DEBRA MCGILL
1815 BERTHA STREET
JACKSONVILLE, FL 32207

s/ Gabriel B. Crafton
Attorney

RETURN OF SERVICE

State of Florida

County of Duval

4th Judicial Circuit County Civil Court

Case Number: 16-2018-CC-15037-XXXX-MA/DIVISION: CC-J

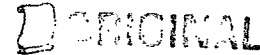
PLAINTIFF:

CHANCE OLEVIA, LLC, a foreign limited liability company,

vs.

DEFENDANT:

UNKNOWN PERSON (1) IN POSSESSION, an individual,

 ORIGINAL

For:

Gabriel Crafton

ROGERS TOWERS, P.A.

1301 Riverplace Boulevard

Suite 1500

Jacksonville, FL 32207

Received by RTI ETC on the 26th day of October, 2018 at 2:48 pm to be served on UNKNOWN PERSON (1) IN POSSESSION, 1815 BERTHA STREET, JACKSONVILLE, Duval County, FL 32207.

I, RONALD E TAYLOR, do hereby affirm that on the 29th day of October, 2018 at 7:55 pm, I:

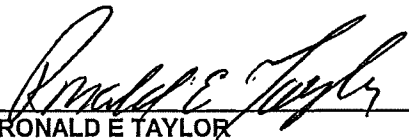
INDIVIDUALLY/PERSONALLY served by delivering a true copy of the UNLAWFUL DETAINER SUMMONS (CLAIM FOR POSSESSION OF PREMISES AND COMPLAINT with the date and hour of service endorsed thereon by me, to: DEBRA MCGILL at the address of: 1815 BERTHA STREET, JACKSONVILLE, Duval County, FL 32207, and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service:

10/29/2018 11:00 am NO RESPONSE AT DOOR.

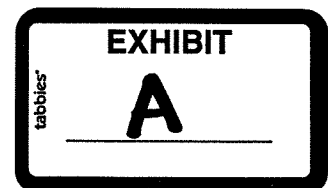
10/29/2018 3:00 pm NO RESPONSE AT DOOR.

I certify that I am over the age of 18, have no interest in the above action, and a duly appointed Special Process Server, in good standing, pursuant to Florida Statute 48.021 (2).


RONALD E TAYLOR
License #35

RTI ETC
P.O. Box 600253
St. Johns, FL 32260
(904) 524-8189

Our Job Serial Number: RET-2018003830



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Case No.: 2018-CC-015037

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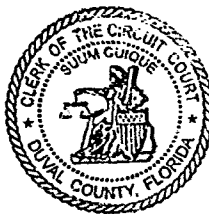
Defendant.

DEFAULT

A default is hereby entered in this action against Defendant, UNKNOWN PERSON (1) IN
POSSESSION n/k/a Debra McGill for failure to serve or file any answer, motion, other pleading or
paper as required by law.

DATED on Nov 06, 2018.

RONNIE FUSSELL
CLERK OF THE COURT



By: Lindsey merced
Deputy Clerk

Copies to:

Gabriel Crafton, Esq.
Debra McGill



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