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

CIVIL DIVISION

A.J. WELLS ROOFING & CONSTRUCTION

a/a/o Shantel Robinson,

CASE NO. 16-2019-CA-004512

Plaintiff,

vs.

UNIVERSAL NORTH AMERICA INSURANCE
COMPANY,

Defendant.

/

PLAINTIFF'S MOTION FOR COURT DEFAULT AND FINAL JUDGMENT

Plaintiff A.J. Wells Roofing & Construction a/a/o Shantel Robinson, by and through the undersigned attorney, moves the Court to enter a Default Order and Final Judgment against Defendant Universal North America Insurance Company under Rule 1.500(b) for failing to plead or otherwise defend as provided by the Florida Rules of Civil Procedure and this Court. In support of Plaintiff's motion, Plaintiff states as follows:

1. Plaintiff's *Complaint and Demand for Jury Trial* in this matter were served on Defendant on July 2, 2019, by the Florida Department of Financial Services' Service of Process Section. Notice of Service of Process was filed with this Court on July 3, 2019, as Docket No. 6. Pursuant to Rule 1.140 of the Florida Rules of Civil Procedure, which requires an answer within twenty (20) days of service of process upon a defendant, Defendant's deadline to respond to Plaintiff's complaint was July 22, 2019.

2. Upon knowledge and belief, Defendant has not filed an answer in response to Plaintiff's Complaint and Demand for Jury Trial, nor any other paper in this matter.

3. On August 15, 2019, the Clerk of the Circuit Court entered a Default against Defendant for failure to serve or file any paper in this matter as required by law. The Clerk's Default was filed with this Court on August 15, 2019, as Docket No. 8.

WHEREFORE, Plaintiff requests this Court to conduct an accounting; determine the amount of damages; and enter a default and final judgment against Defendant Universal North America Insurance Company under Rule 1.500(b) consistent with the proposed order submitted herewith.

Respectfully submitted on August 15, 2019.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been served by electronic mail via the Florida Courts e-filing Portal to all parties and designated primary and secondary e-mail addresses provided for thereon on August 15, 2019.

SHELTON LAW, PLLC

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**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY FLORIDA**

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A.J. WELLS ROOFING & CONSTRUCTION

a/a/o Shantel Robinson,

CASE NO. 16-2019-CA-004512

Plaintiff,

vs.

**UNIVERSAL NORTH AMERICA INSURANCE
COMPANY,**

Defendant.

_____ /

ORDER OF DEFAULT AND FINAL JUDGMENT

A DEFAULT and FINAL JUDGMENT is entered in this action pursuant to Florida Rule of Civil Procedure 1.500(b) against Defendant Universal North America Insurance Company for failing to plead or otherwise defend as provided by the Florida Rules of Civil Procedure and this Court, for the following amount of damages and costs:

Judge: _____

Date: _____

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