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

DIRECT GENERAL INSURANCE COMPANY,

Plaintiff,

CASE NO.: 19-CA-006805

v.

JOSHUA PHILLIP COLE, et al.

Defendants.

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT

Plaintiff, DIRECT GENERAL INSURANCE COMPANY, by and through its undersigned counsel, pursuant to the Florida Rules of Civil Procedure Rule 1.500(e), asks the Court to enter a Default Final Judgment against Defendants, CARLOS CESAR GONZALEZ GOMEZ, YANELIS JUVIER, MORI, BEAN AND BROOKS, INC., D/B/A MBB RADIOLOGY and LCM IMAGING, INC., D/B/A ADVANCED DIAGNOSTIC GROUP, and states as follows:

1. Plaintiff filed a declaratory action against Defendants, CARLOS CESAR GONZALEZ GOMEZ, YANELIS JUVIER, MORI, BEAN AND BROOKS, INC., D/B/A MBB RADIOLOGY and LCM IMAGING, INC., D/B/A ADVANCED DIAGNOSTIC GROUP, on September 27, 2019.
2. Defendants, CARLOS CESAR GONZALEZ GOMEZ, YANELIS JUVIER, MORI, BEAN AND BROOKS, INC., D/B/A MBB RADIOLOGY and LCM IMAGING, INC., D/B/A ADVANCED DIAGNOSTIC GROUP, have failed to timely file an answer or any responsive pleading.
3. The Clerk of Court entered a default on November 14, 2019 against Defendants, CARLOS CESAR GONZALEZ GOMEZ, YANELIS JUVIER, MORI, BEAN AND BROOKS, INC., D/B/A MBB RADIOLOGY and LCM IMAGING, INC., D/B/A ADVANCED DIAGNOSTIC GROUP.

4. Pursuant to Florida Rule of Civil Procedure, 1.500(e), this Court is empowered to enter a Final Judgment after default at any time.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order granting Plaintiff's Motion for Entry of Default Final Judgment against Defendants, CARLOS CESAR GONZALEZ GOMEZ, YANELIS JUVIER, MORI, BEAN AND BROOKS, INC., D/B/A MBB RADIOLOGY and LCM IMAGING, INC., D/B/A ADVANCED DIAGNOSTIC GROUP, and grant any other relief deemed just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, Motion for Entry of Default Final Judgment, has been furnished to all those listed in the ePortal and has been sent via U.S. Mail on this 10th day of January, 2020 to: Carlos Cesar Gonzalez Gomez 2304 St. Johns Bluff, S, Apt 1307 Jacksonville, FL 32246, Yanelis Juvier 2304 St. Johns Bluff, S, Apt 1307 Jacksonville, FL 32246, Mori Bean and Brooks, Inc. d/b/a MBB Radiology c/o Corporation Service Company 1201 Hays St, Tallahassee, FL 32301 and LCM Imaging, Inc. d/b/a Advanced Diagnostic Group c/o Corporate Creations Network, Inc. 11380 Prosperity Farms Rd, #221E Palm Beach Gardens, FL 33410.

/s/ Robert K. Savage

Robert K. Savage

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