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In the Circuit Court
4th Judicial Circuit
In and For Duval County FL

~~Edna~~ Helene Connie aka
Ava Electris Connie
plaintiff

vs.

A Bail Bonds of Florida, Inc.
Stephen Patterson

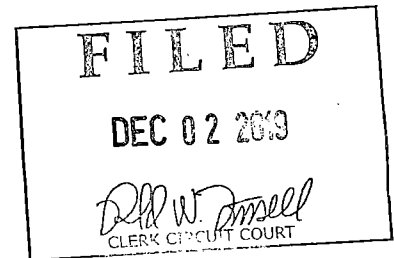
Clifford Coble

Elizabeth Pritchard

Walter Carter
defendant(s)

Case 2019-CA 7200

Div: CV-6



Motion for Default Judgment

1. Now comes plaintiff ~~Edna~~/Ava Connie to state that A Bail Bonds of Florida has failed to answer the Complaint (served Oct 21, 2019) in no later than 20 days... Nov 10, 2019 extended due to Holiday, to Nov 12, 2019. Enclosed is a proposed ORDER of Default.
2. Because A Bail Bonds of Florida, Inc. is a Corporation, it is required as a corporation in Circuit court, to be represented by counsel and it can not be represented by a non-lawyer in circuit court.
3. Any pleadings filed on behalf of the Corporation by a non-lawyer, are considered Moot. Hence the Complaint has not been answered by an attorney for the Corporation within the 20 days as stated and required on the summons and A Bail Bonds of Florida, Inc is in default. Stephen Patterson, a non-lawyer, can not answer

or file a Motion to Dismiss, as he did, on behalf of the corporation A Bail Bonds of Florida, Inc, because he is not ~~registered~~ ^{registered} in the state of Florida with a license to practice law.

4. A corporation defendant (A Bail Bonds of Florida, Inc) must have legal counsel and is unable to be represented by an officer of the corporation who is a non-lawyer. Richter vs. Higdon Homes Inc 544 So.2d. 300 Fla 1st DCA 1989. Quinn vs. Housing Authority of the City of Orlando 385 So.2d 1167 (Fla 5th DCA, 1980) (a corporation is not a person and therefore must be represented by a attorney.)

5. Wherefore plaintiff requests a default judgment ORDER to be entered against defendant - A Bail Bonds of Florida, Inc for failing to have legal counsel for the corporation, answer the complaint within the required 20 days of service - Oct 21, 2019 Due by Nov 10, 2019 extended to Nov 12, 2019 due to holiday.

Respectfully

Helene Carrie aka

Ava Electris Carrie

FST FC-H

P.O. Box 1000 Chattahoochee Fl. 32324

Certify

I hereby certify a true notice/copy has been sent to A Bail Bonds of Florida, Inc, 125 N. Market St. Jax Fl. 32202 this Nov 12, 2019 via the US Mail and the FST mailman.

Helene Carrie aka Ava Electris Carrie
also noticed

Stephen Patterson 125 N. Market St Jax Fl. 32202, Clifford Colele 5318 Golf Course Dr. Jax Fl. 32277, Elizabeth Pritchard 5741 Richmond Rd Jax Fl. 32210 and Walter Carter via Eric Friday 1919 Atlantic Blvd. Jax Fl. 32207 Nov 12, 2019 via the US Mail and FST mailman. Helene Carrie aka Ava Electris Carrie

In the Circuit Court
4th Judicial Circuit
In and for Duval County, FL.

Eva Helene Camie aka
Ana Electris Camie
Plaintiff

Case 2019-CA7200
Div CV-6

vs.

A Bail Bonds of Florida, Inc
Stephen Patterson
Clifford Coble
Elizabeth Pritchard
Walter Carter
defendant(s)

ORDER on Motion for Default.

1. The clerk issued a summons for A Bail Bonds of Florida, Inc Oct 10, 2019 Document # 10. The summons came back served on A Bail Bonds of Florida, Inc via Stephen Patterson Officer of A Bail Bonds of Florida, Inc, Oct 21, 2019 Doc. # 13.
2. A Bail Bonds of Florida, Inc failed to hire Counsel to respond to the Complaint on behalf of the Corporation. In error, Stephen Patterson, a non lawyer, responded to the Complaint, which is not allowed. Hence no response has been made on behalf of the Corporation, A Bail Bonds of Florida, Inc.
3. A Bail Bonds of Florida is in default

and the Clerk or Judge shall enter this
ORDER of Default

Date _____

(Seal)

~~Clerk of Court or~~
Judge of Circuit Court
Gary Wilkinson

Certification of Service to:

A Bail Bonds of Florida Inc, 125 N. Market St Jax FL 32202
Stephen Patterson 125 N. Market St Jax FL 32202
Clifford Coker 5318 Golf Course Dr. Jax FL 32277
Elizabeth Pritchard 5741 Richmond Rd Jax FL 32210
Walter Carter via Eric Friday 1919 Atlantic Blvd Jax FL 32202
Eva Pamie aka Ava E Pamie FSH FCH PO Box 1000
Chattahoochee FL 32324 and 500 E Adams St Jax FL 32202
and 500 E Adams St Jax FL 32202
#2015029685

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