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

CASE NO.: 2020-CA-322

DIVISION: CV-G

CHRISTOPHER MATHEW KOHN, an
individual

Plaintiff,

v.

CHRISTOPHER CONNOLLY, an
individual, and EAN HOLDINGS, LLC, a
foreign limited liability company,

Defendants.

_____ /

**PLAINTIFF'S MOTION FOR FINAL JUDGMENT AS TO
LIABILITY AFTER DEFAULT AGAINST DEFENDANT CHRISTOPHER CONNOLLY**

Plaintiff, CHRISTOPHER MATHEW KOHN, by and through his undersigned attorney and pursuant to Rule 1.500, Florida Rules of Civil Procedure, hereby moves this Court for entry of a Final Default Judgment as to liability against Defendant, Christopher Connolly. As grounds for all relief, Plaintiff states the following:

1. This is an action for damages exceeding the sum of \$15,000.00, exclusive of interest, attorney's fees and costs.
2. On July 17, 2019, Defendant, Connolly negligently operated a motor vehicle and collided with Mr. Kohn's motor vehicle operated by Mr. Kohn.
3. As a direct and proximate result of the foregoing negligence, Mr. Kohn suffered bodily injury, or aggravation of an existing disease or physical defect, or aggravation of a latent disease or physical defect, and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life,

expense of hospitalization, medical and nursing care and treatment, loss of earnings, and loss of earning capacity and the ability to earn money. The losses are permanent and ongoing and Mr. Kohn will suffer the losses in the future.

4. On January 16, 2020, Plaintiff filed his Complaint against Defendant Connolly.

5. On March 14, 2020, Defendant Connolly was properly served with a copy of the Summons and Complaint in this action.

6. Defendant Connolly failed to file a timely response and was defaulted on April 15, 2020.

WHEREFORE, Plaintiff requests that this Court enter Judgment as to liability in favor of Plaintiff and against Defendant Christopher Connolly. Plaintiff further requests that this Court reserve ruling on awarding Plaintiff its damages, costs, and such other and further relief, at law or in equity, which the Court deems just and proper and schedule a one trial on damages.

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By: /s/ Phillip M. Vogelsang

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of April 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using Florida Courts E-Filing Portal, which will electronically serve the foregoing on the following counsel of record:

Christopher Connolly
3005 Peachtree Rd. NE
Atlanta, GA 30305

/s/ Phillip M. Vogelsang
Attorney

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