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

**IMPERIAL FIRE & CASUALTY INSURANCE COMPANY,**

**Plaintiff,**

**CASE NO.: 2020-CC-001848**

**v.**

**MARK ERIC LOCKETT, JR.,**

**Defendant.**

\_\_\_\_\_ /

**MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

Plaintiff, IMPERIAL FIRE & CASUALTY INSURANCE COMPANY, by and through its undersigned counsel and pursuant to the Florida Rules of Civil Procedure Rule 1.500(e), asks the Court to enter a Default Final Judgment against Defendant, MARK ERIC LOCKETT, JR., and says:

1. Plaintiff filed a declaratory action against Defendant, MARK ERIC LOCKETT, JR., on February 5, 2020.
2. Defendant, MARK ERIC LOCKETT, JR., has failed to timely file an answer or any responsive pleading.
3. The Clerk of Court entered a default on March 18, 2020 against Defendant, MARK ERIC LOCKETT, JR.
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 Defendant, MARK ERIC LOCKETT, JR., 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 served on this 19<sup>th</sup> day of March, 2020 to: Mark Eric Lockett, Jr. 4651 Sallsbury Road Suite 400 Jacksonville, FL 32256.

/s/ Robert K. Savage

Robert K. Savage

Florida Bar No. 995576

Alfred Villoch, III

Florida Bar No. 631434

Eric Nelsestuen

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*Attorney for Plaintiff*

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