IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION

CASE NO. CACE-22-001852

KAMEKA MANAGEMENT SOLUTIONS, INC. and ERYCK DZOTSI,

Plaintiff,

-vs-

16260 SADDLE CLUB ROAD, LLC, RYAN BURKE, VEW LIVE, LLC and 2045 SW 127th Avenue, LLC.

Defendants.
_____/

DEFENDANTS' NOTICE OF FILING SUPPLEMENTAL AUTHORITY IN SUPPORT OF MOTION TO QUASH SERVICE AND SET ASIDE DEFAULT

COMES NOW the Defendants, 16260 SADDLE CLUB ROAD, LLC; RYAN BURKE, VEW LIVE, LLC; and 2045 SW 127the Avenue, LLC (Collectively referred to hereafter as "The Defendants"), hereby file their motion to quash service and set aside motion for default as follows:

1. *Vives v. Wells Fargo, N.A.* 128 So.3d 9, 15 (Fla. 3d DCA 2012) (explaining that a return of service was irregular on its face because the return of service does not state the name of the person on whom service was made).

2. *Murphy v. Cach, LLC*, 230 So.3d 599, 601 (Fla. 5th DCA 2017)("Here, the amended affidavit of service of process is facially deficient under section 48.21 because it does not contain the name of the person served. Providing a physical description of

John Doe in lieu of providing the individual's name is insufficient compliance with section 48.41").

3. *Robles-Martinez v. Diaz, Reus & Targ, LLP*, 88 So.3d 177, 179 (Fla. 3d DCA 2011) (Plaintiff bears ultimate burden of proving valid service of process. This burden requires Plaintiff to demonstrate that the return of service under section 48.21 is facially valid or regular on its face). See also, (*Carus v.Cove at Isles at Bayshore*, decided November 23, 2022, NO. 3021-2035 47 Fla.L.Weekly 12 2413).

Respectfully Submitted,
/s/: ROBERT A. ROSENBLATT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of Court via e-filing and copies were furnished via email to: Raymond Carrero, Esq., 9771 S. Dixie Highway, Pinecrest, Florida 33156, at [redacted]

Dated this 26 day of January, 2023.

Respectfully Submitted

THE ROSENBLATT LAW FIRM
7695 SW 104th Street, 2d Floor
Pinecrest, Fl 33156
[redacted]

/s/: ROBERT A. ROSENBLATT
Attorney for Defendants
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