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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' MOTION TO DISMISS COMPLAINT PURSUANT TO FLA.R.CIV.P. 1.070(J)

Defendants, by and through their undersigned counsel move to dismiss the complaint in that summons was not served on the Defendants within 120-day period as required by Rule 1.070(J) and states the following facts:

1. The complaint in this matter was filed with the Clerk on February 3rd, 2022.

2. The Plaintiff has failed to serve process on the Defendants within the 120-day period as required by Rule 1.070(J).

3. Moreover, the Plaintiff has failed to allege any good cause and has not sought additional extension.

WHEREFORE based upon the above, the Defendants move to dismiss the complaint.

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: Keith Gaudioso, Esq., 2332 Galiano Street, 2d Floor, Coral Gables, Fl 33134, [redacted]

Dated this 24th day of August, 2023.

Respectfully Submitted

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

/s/: ROBERT A. ROSENBLATT
Attorney for Defendants
Fla.Bar No. 153239