

3. The Defendants were served on May 17, 2024. See proof of service attached as Exhibit 1 to this Motion.
4. The Defendants had twenty (20) days from the date of service of process to appropriately respond to the Complaint. *See Fla. R. Civ. P. 1.140.*
5. The Defendants have not filed any document in this case and has thus have not responded to the Complaint in accordance with Rule 1.140 of the Florida Rules of Civil Procedure.
6. Rule 1.500(b), Florida Rules of Civil Procedure, allows a Pleader to move the Court to enter a Court ordered Default if the opposing party fails to plead timely, or otherwise defend the action.
7. Because more than twenty days have passed since the Plaintiff served process, and because the Defendants have failed to file any document in this case, the Court may enter a default. *See Fla. R. Civ. P. 1.500(b).*
8. A Non-Military Affidavit has been filed in this case for Defendant LENA WALTER.
9. Accordingly, the Court should grant this Motion for Entry of Court Default.

WHEREFORE, for the foregoing reasons, Plaintiff KLODJAN DOLLMA respectfully requests that this Honorable Court enter an order granting Plaintiff's Motion for Default, and other relief as this Court deems just and proper.

Respectfully Submitted

/s/ Jose J. Teurbe-Tolon
JOSE J. TEURBE-TOLON, ESQ.
FL BAR NO. 87791

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of September, 2024, the foregoing MOTION FOR DEFAULT has been served on the Defendants who have not yet entered an appearance on this case, by placing the foregoing and all attachments in the service website which was authorized by the Court in its Order of May 16, 2024.

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