

In the matter of Marcio Sousa Sales vs. Antonio de Andrade

EMERGENCY MOTION TO STRIKE IMPROPER POST-DISMISSAL FILINGS, BAR FURTHER
ACTION IN CLOSED CASE, AND NOTICE OF FEDERAL ESCALATION AND JUDICIAL
MISCONDUCT

**IN THE CIRCUIT OF THE 15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA**

MARCIO SOUSA SALES,

Plaintiff,

CASE NO: 50-2025-CA-000969-XXA-MB

vs.

ANTONIO DE ANDRADE,

Defendant,

_____ /

**EMERGENCY MOTION TO STRIKE IMPROPER POST-
DISMISSAL FILINGS, BAR FURTHER ACTION IN
CLOSED CASE, AND NOTICE OF FEDERAL
ESCALATION AND JUDICIAL MISCONDUCT**

COMES NOW the Plaintiff, Marcio Sousa Sales, pro se, and respectfully
moves this Court to immediately strike all filings, hearing requests, and scheduling
attempts submitted by Defendant Antonio de Andrade and/or his legal counsel after
the dismissal of this case with prejudice on *May 15, 2024*. In further support,
Plaintiff provides the following:

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I. PROCEDURAL BACKGROUND

This action was dismissed with prejudice by order dated *May 15, 2024*, following a contested proceeding where Plaintiff Marcio Sousa Sales, a pro se litigant, was not present due to improper hearing notice and objections being ignored.

Despite dismissal, Defendant's counsel (KellerGibson PLLC) continues to file motions and attempt to schedule hearings, including renewed efforts to seek sanctions under § 57.105, while fully aware that:

The case is closed;

Two active appeals are pending (4D2025-1600 and 4D2024-3229);

A new, proper lawsuit was filed under Case No. 50-2025-CA-005676, mooted all issues in this matter.

II. THE COURT LACKS JURISDICTION TO ENTERTAIN ANY POST-DISMISSAL FILINGS

Under Florida Rule of Appellate Procedure 9.130(f), once a Notice of Appeal is filed, the trial court is divested of jurisdiction over the subject matter:

“The filing of a notice of appeal shall operate as a stay of the lower tribunal’s order to the extent that such stay is authorized by law and shall transfer jurisdiction to the

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appellate court.” See also: *Batteh v. State Farm Mut. Auto. Ins. Co.*, 733 So. 2d 584

(Fla. 5th DCA 1999) – trial court has no jurisdiction to issue rulings on § 57.105

motions during appeal. *Kairalla v. John D. and Catherine T. MacArthur*

Foundation, 534 So. 2d 774 (Fla. 4th DCA 1988) – sanctions filed post-dismissal

are improper and void. *City of Miami v. Arostegui*, 616 So. 2d 1117 (Fla. 1st DCA

1993) – courts may not grant post-dismissal relief while jurisdiction lies with the

appellate court.

III. DEFENDANT'S CONDUCT IS HARASSING AND IN BAD FAITH

Counsel for Defendant continues to misuse this Court’s resources to provoke unlawful and unjust hearings against a pro se litigant, ignoring established precedent, jurisdictional bars, and ethical limitations. Further, they are aware that this matter is actively under appellate review, and that a new, properly framed case has been filed — rendering their actions frivolous and retaliatory.

Florida Rule of Judicial Administration 2.515(a) prohibits filings not grounded in law or fact and made for an improper purpose.

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**IV. JUDGE SCOTT FAILED TO RULE ON 12 MOTIONS FILED
BY PLAINTIFF**

The Plaintiff respectfully notes that Judge Scott, assigned to this matter, failed to rule on any of the 10 Plus substantive motions filed by Plaintiff prior to dismissal, including objections to improper hearings, motions to strike, and requests for relief.

This reflects:

*A pattern of judicial inaction and disregard for pro se due process,
A failure to uphold Canon 3B(8) of the Florida Code of Judicial
Conduct (duty to dispose of matters promptly and fairly),
A failure to protect constitutional rights under the 14th Amendment.*

**V. WARNING OF FEDERAL ESCALATION & PUBLIC
ACCOUNTABILITY**

This case is being monitored for federal escalation under 42 U.S.C. § 1983, for denial of due process, unequal treatment of a pro se party, and the enabling of attorney abuse by judicial indifference.

Additionally, the unlawful conduct of opposing counsel and this ongoing pattern of judicial disregard have been publicly documented through press media, blog posts,

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and social platforms. This matter will not be swept under the rug, and the record will reflect each act of abuse or failure to act. “Any hearing scheduled or ruling issued under a closed docket while two active appellate cases are pending constitutes judicial overreach and improper exercise of jurisdiction, warranting immediate review by the appellate court and federal notification under 42 U.S.C. § 1983.”

VI. RELIEF REQUESTED

Plaintiff respectfully demands that this Honorable Court:

Strike all post-dismissal filings submitted by Defendant or their attorneys after May 15, 2024;

Bar any further hearing scheduling in this closed matter;

Refer opposing counsel for sanctions if further improper filings continue; Enter a warning that jurisdiction over this case has transferred to the appellate court, and

Acknowledge the pending proper lawsuit under Case No. 50-2025-CA-005676 and cease all attempts to resuscitate a procedurally dead case.

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VII. VOID DISMISSAL RESULTING FROM UNAUTHORIZED COURT APPEARANCE AND PROCEDURAL MISCONDUCT

A. Violation of Procedural Requirements: Rule 2.505(e), Fla. R. Gen. Prac. & Jud. Admin.

Under Rule 2.505(e), only attorneys who have either (1) signed the initial pleading or (2) filed a formal Notice of Appearance may legally act on behalf of a party in court. Mr. Gibson had done neither.

“An attorney shall file a notice of appearance to officially represent a party unless that attorney signed the initial pleading. No other pleadings or motions may be filed unless a notice of appearance is entered.” – Rule 2.505(e)

Despite this, Mr. Gibson filed motions, appeared before the Honorable Judge Scott, and moved for case dismissal against a pro se litigant who was not present.

Supporting case law:

1. Gross v. State, 310 So. 3d 89 (Fla. 4th DCA 2020)

2. Sconiers v. State, 248 So. 3d 273 (Fla. 1st DCA 2018)

3. State v. Almeda, 951 So. 2d 972 (Fla. 4th DCA 2007)

4. Ford Motor Co. v. Jackson, 634 So. 2d 1094 (Fla. 4th DCA 1994)

5. Lee v. State, 490 So. 2d 136 (Fla. 1st DCA 1986)

6. Pino v. Bank of N.Y., 76 So. 3d 927 (Fla. 2011)

7. MacCrate v. MacCrate, 627 So. 2d 580 (Fla. 4th DCA 1993)

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B. Violation of Plaintiff's Due Process Rights

Mr. Sales, a pro se litigant, was not present at the hearing due to improper scheduling and lack of formal notice, as outlined in his prior objections. The Court proceeded in his absence and accepted oral arguments for dismissal from an attorney not of record, violating the Fourteenth Amendment's guarantee of due process and undermining the integrity of the proceeding.

Supporting case law:

1. *Goldstein v. Goldstein*, 137 So. 3d 453 (Fla. 4th DCA 2014)
2. *Valdes v. Assoc. Marine Inst., Inc.*, 877 So. 2d 843 (Fla. 3d DCA 2004)
3. *Reddick v. Reddick*, 728 So. 2d 374 (Fla. 5th DCA 1999)
4. *Goss v. Lopez*, 419 U.S. 565 (1975)
5. *Mullane v. Cent. Hanover Bank*, 339 U.S. 306 (1950)
6. *Baron v. Baron*, 941 So. 2d 1233 (Fla. 2d DCA 2006)
7. *Capote v. Gonzalez*, 64 So. 3d 737 (Fla. 3d DCA 2011)

C. Unauthorized Practice and Ethical Misconduct

Mr. Gibson's actions violated not only procedural rules but also the Florida Bar Rules of Professional Conduct, including:

- Rule 4-3.3 (Candor Toward the Tribunal)
- Rule 4-5.5 (Unauthorized Practice of Law)
- Rule 4-8.4(c) (Conduct Involving Dishonesty, Fraud, or Misrepresentation)

No attorney—regardless of their firm partnership—may bypass mandatory appearance filings. The fact that Mr. Gibson is a colleague of Mr. Keller does not confer automatic status as attorney of record. His conduct misled the Court and denied the Plaintiff fair opportunity to contest dismissal.

Supporting case law:

1. *The Florida Bar v. Beach*, 675 So. 2d 106 (Fla. 1996)

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2. The Florida Bar v. Calvo, 630 So. 2d 548 (Fla. 1993)

3. In re Amendments to Rules Regulating The Fla. Bar, 718 So. 2d 1179 (Fla. 1998)

4. The Florida Bar v. Greene, 926 So. 2d 1195 (Fla. 2006)

5. The Florida Bar v. Spann, 682 So. 2d 1070 (Fla. 1996)

6. The Florida Bar v. MacMillan, 600 So. 2d 457 (Fla. 1992)

7. The Florida Bar v. Feige, 596 So. 2d 433 (Fla. 1992)

D. Harm to the Plaintiff and the Integrity of the Process

Plaintiff paid court filing fees and submitted over a dozen un rebutted motions, none of which were ever ruled upon. The hearing resulted in case dismissal by oral request from an unauthorized lawyer, irreparably prejudicing the Plaintiff and tainting the record.

This constitutes a void judgment under Florida law and may warrant:

- Reinstatement of the original case;
- Sanctions against participating counsel;
- Disciplinary referral and/or federal civil rights escalation.

Respectfully Submitted

Marcio Sousa Sales

22187 Aquila Street

Boca Raton, FL 33528

info@legalhelp4y.com

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the EMERGENCY MOTION TO STRIKE IMPROPER POST-DISMISSAL FILINGS, BAR FURTHER ACTION IN CLOSED CASE, AND NOTICE OF FEDERAL ESCALATION AND JUDICIAL MISCONDUCT was served on Antonio de Andrade, at his e-mail tjlmarble@yahoo.com as well to his attorney email seth@kellergibson.com bgibson@kellergibson.com in this June 20, 2025.

Marcio Sousa Sales
22187 Aquila Street
Boca Raton, FL 33528

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ATTACHMENTS IN SUPPORT OF THIS MOTION

Plaintiff respectfully submits the following supporting materials:

Exhibit A – Complaint filed by Plaintiff Marcio Sousa Sales with the Florida Bar regarding unethical conduct by opposing counsel;

Exhibit B – Complaint filed by legal assistant Rogerio Scotton detailing the attorney’s continued abuse of legal process and misconduct;

Exhibit C – Transcript excerpt of the court hearing on May 15, 2024, in which Judge Scott falsely claims to have “reviewed all documents,” despite failing to rule on any of Plaintiff’s motions;

Exhibit D – Link to publicly available blog article and video report titled: “The Judge Who Covered the Wrong to Punish the Innocent”, detailing this case’s systemic irregularities and its wider legal implications;

Exhibit E – Screenshot or printout showing the docket reflects zero rulings on any pro se filings submitted by Plaintiff prior to dismissal.

Exhibit F- Improper Filing and Unauthorized Appearance by Brandon J. Gibson, Esq.

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Exhibit A

– Complaint filed by Plaintiff Marcio Sousa Sales with the Florida Bar regarding unethical conduct by opposing counsel;

To: The Florida Bar – Attorney Consumer Assistance Program

From: Marcio Sousa Sales

Date: May 13, 2025

Subject: Formal Complaint – Attorney Misconduct: Seth R. Keller, Esq. 806471

Dear Florida Bar Review Counsel,

I am submitting this formal complaint against Seth R. Keller, Esq., Florida Bar No. 806471, for egregious and continuing violations of the Rules Regulating The Florida Bar in the case **of Sales v. Andrade, Case No. 50-2025-CA-000969-XXA-MB**, currently pending in Palm Beach Circuit Court.

Mr. Keller has demonstrated a pattern of knowingly unethical conduct, including:

Knowingly pursuing litigation against the wrong party: His client, Mr. Antonio de Andrade, initiated suit against me for a debt I was not responsible for, despite clear evidence the responsible party was an LLC owned by my son.

Engaging in misleading representations to the court: Mr. Keller continued trial proceedings against an individual (my son) who was never named in the complaint, while maintaining the judgment in my name. This conduct deprived me of due process and resulted in a judgment that is now on appeal.

Filing a baseless §57.105 sanctions motion: Despite knowing the procedural and factual background, Mr. Keller filed a motion for sanctions against me as a pro se litigant—without good faith basis and in violation of Florida Statutes and case law.

Violating multiple Rules of Professional Conduct, including:

Rule 4-3.1 – Frivolous proceedings

Rule 4-3.3 – False statements to tribunal

Rule 4-4.4 – Abuse of legal process

Rule 4-8.4(c) – Dishonesty and misrepresentation

Rule 4-8.4(d) – Conduct prejudicial to justice

Attempting to suppress valid claims by abusing procedure: His actions appear primarily intended to silence my right to be heard, intimidate me as a pro se litigant, and protect an improperly obtained judgment.

In addition to this formal complaint, I am also in the process of submitting related complaints and requests for investigation to ***the Florida Attorney General's Office, the U.S. Department of Justice (Office of Professional Responsibility), the FBI Public Corruption and Civil Rights Division, and the Palm Beach County Court Administration.*** Given the gravity of the misconduct, the repeated abuse of legal process, and the attempt to use the court system to mislead, intimidate, and enrich himself through unlawful litigation tactics against a pro se litigant, I respectfully request that this matter be treated with urgency and referred for full disciplinary review.

I respectfully request the Florida Bar investigate Mr. Keller's conduct and take appropriate disciplinary action. Attached are the court filings substantiating these allegations.

I believe this conduct may not be isolated to this case. If this attorney is permitted to continue this pattern unchecked, it risks not only harming vulnerable litigants but also undermining the public's trust in the legal profession and judicial system.

Sincerely,

Marcio Sousa Sales
Plaintiff, Pro Se
160 W Camino Real, 102
Boca Raton, FL 33432
Phone Number: (561) 770-8909
Email Address: info@legalhelp4y.com

Attachments:

Plaintiff's Supplemental Response and Notice of Misconduct

Defendant's Motion to Dismiss and for Sanctions

Copy of Judgment and Appeal Notice

In the matter of Marcio Sousa Sales vs. Antonio de Andrade

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Exhibit B

Complaint filed by legal assistant Rogerio Scotton detailing the attorney's continued abuse of legal process and misconduct;

FORMAL BAR RESPONSE – PERSONAL COMPLAINT

To Be Submitted by: Rogerio Scotton, Robert Scarcell, Peter Aldo

Subject: **Formal Complaint Against Attorney Seth R. Keller – Case Ref: RFA No. 25-12722**

To the Florida Bar,

I am writing directly, in my personal capacity, to address what I view as an unacceptable failure by your office to act on a serious matter of attorney misconduct. The previous complaint filed by Mr. Marcio Sousa Sales was prematurely closed under the justification that the matter “involves a dispute over which a court has jurisdiction.” That rationale is not only inadequate — it is a dangerous excuse that enables systemic abuse and perpetuates injustice under the color of professional immunity.

This complaint is not about a procedural dispute. It is about willful, repeated violations of law and ethics by a licensed attorney, knowingly executed to suppress, intimidate, and destroy the due process rights of a self-represented party.

What Attorney Seth R. Keller Has Done — and Why It Matters:
Knowingly Sued the Wrong Party:

Keller initiated litigation against Mr. Marcio Sousa Sales, a private individual, even though he knew — or should have known — that the correct party was an LLC in which Marcio had no legal role.

On April 14, 2025, Attorney Seth R. Keller issued a second sanctions letter pursuant to § 57.105, again targeting Mr. Marcio Sousa Sales — a known pro se litigant. The letter not only demands dismissal of a pending complaint, but also threatens sanctions against a hypothetical future complaint that had not yet been approved by the court. This conduct is harassing, procedurally improper, and intentionally aimed at intimidating a vulnerable party.

Moreover, Keller directs the letter to a third-party assistant, “Legal Help 4 You,” attempting to implicate them in unauthorized practice without basis — despite full knowledge that no legal representation exists. This is an abuse of both the judicial process and the professional license, done in bad faith and contrary to the ethical rules of the Florida Bar. (see attached 2 letter from Attorney).

He proceeded with litigation against Marcio’s son, knowingly allowing the wrong individual to be tried while shielding the LLC.

This is not a mistake. This is intentional misrepresentation to the court and a violation of the Rules Regulating The Florida Bar, including Rule 4-3.1 (meritorious claims and contentions), and 4-3.3 (candor toward the tribunal).

Post-Judgment Misconduct and Abuse of Sanctions:

After the court dismissed the second case without prejudice, and while it is actively on appeal, Keller attempted to file a sanctions motion under § 57.105, seeking attorney’s fees from the pro se party.

This is a clear abuse of process under Fla. R. Civ. P. 1.420, and constitutes harassment of a self-represented litigant during an open appeal.

Misuse of Process and Judicial Manipulation:

Keller set a hearing unilaterally, without judicial order, while other motions (such as objections and motions to stay) remained unresolved. This is in direct violation of Florida Rules of Judicial Administration and violates the integrity of the process.

He is clearly attempting to weaponize procedure, using his license and court familiarity not to seek justice, but to exploit an unrepresented person.

Ethical and Moral Bankruptcy:

Keller has failed in his duty to advise his client of errors, failed to withdraw meritless claims, and is actively prolonging injustice solely for personal gain. This behavior undermines public confidence in the profession and violates Rule 4-8.4(d), which prohibits conduct prejudicial to the administration of justice.

Why the Florida Bar's Excuse Letter Is Not Acceptable:

The letter dated May 28, 2025, from Richard Coombs, is not just dismissive — it is part of the problem. It exemplifies the very reason people have lost faith in legal institutions. Telling a litigant “we don’t have jurisdiction” while turning a blind eye to clear, documented misconduct by a Florida-licensed attorney is a disgrace.

If the Florida Bar claims to protect the public from attorney misconduct, it must not excuse criminal-like conduct just because it occurred inside a courtroom.

Your refusal to act not only empowers Keller — it marks the Florida Bar as complicit in protecting corrupt legal practices. In the public eye, this is not oversight — it is obstruction.

Notice of Public and Legal Escalation:

Please be advised that:

A second civil lawsuit has now been filed by Mr. Marcio Sousa Sales against Mr. Keller’s client (Antonio de Andrade) — supported by sworn affidavits, motions, and exhibits documenting all misconduct listed above.

All records, including this Bar complaint, will be made available for public access, published via independent media, and shared with organizations advocating for pro se rights and judicial transparency.

This matter will be further reported to the Judicial Qualifications Commission, the Office of Inspector General, and federal civil rights authorities if Florida’s own institutions continue to shield unethical conduct.

What the Florida Bar Must Do Now:

Immediately re-open this complaint.


Require a formal response from Attorney Seth R. Keller to all allegations.

Notify him that retaliatory use of sanctions against a pro se litigant will be treated as misuse of authority and professional misconduct.

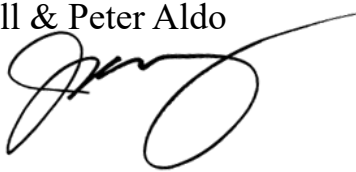
Failing to do so confirms what the public already suspects — that the Florida Bar is less a regulator and more a shield for the legal elite, protecting its own regardless of harm done to the people it is supposed to serve.

The public is watching. This is no longer a legal complaint — it is a fight for justice.

Sincerely,



Rogerio Scotton, Robert Scarcell & Peter Aldo
160 W camino Real # 102
Boca Raton, Florida 33432



In the matter of Marcio Sousa Sales vs. Antonio de Andrade

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Exhibit C

Transcript excerpt of the court hearing on May 15, 2024, in which Judge Scott falsely claims to have “reviewed all documents,” despite failing to rule on any of Plaintiff’s motions;

**Transcript Excerpt – Hearing on Motion to Dismiss
IN THE CIRCUIT OF THE 15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA**

MARCIO SOUSA SALES,

Plaintiff,

CASE NO: 50-2025-CA-000969-XXA-MB

vs.

ANTONIO DE ANDRADE,

Defendant,

_____/

Transcript Excerpt – *Hearing on Motion to Dismiss*

Case: *Antonio de Andrade v. Marcio Sousa Sales*

Date: May 14, 2025

Judge: The Honorable Scott

Location: Circuit Court of the Fifteenth Judicial Circuit, Palm Beach County

Attorney (Keller or Gibson):

"Dexert, hearing on motion to dismiss, May 14, 2025. Mr. Sales is not here. If you'd like me to go into the substance of the motion, I can do that, but that is our position on the motion. I believe it should be granted, simply for the fact that Mr. Sales failed to appear."

Transcript Excerpt – Hearing on Motion to Dismiss

Judge Scott:

"Alright. Mr. Sales was noticed to be here. He's not here. I have reviewed the papers that were filed in this case, so I'm going to grant the motion to dismiss at this time. Thank you."

LEGAL NOTE:

- At the time of this hearing, **multiple motions filed by Mr. Sales** were still pending, including:
 - Objection to the hearing,
 - Motion to strike opposing counsel's filings,
 - Motion to dismiss due to improper service,
 - Motion to stay,
 - Others still awaiting ruling.
- **No formal hearing notice was ever issued** to Mr. Sales via order or confirmed service, in violation of due process.
- Judge Scott's statement, "***I have reviewed the papers that were filed in this case,***" stands in direct contradiction to the court record, which **shows no rulings issued** on any of the above motions.



JOSEPH ABRUZZO

CLERK OF THE CIRCUIT COURT & COMPTROLLER
PALM BEACH COUNTY

CASE NUMBER: 50-2025-CA-000969-XXXX-MB
CASE STYLE: SALES, MARCIO SOUSA V DE ANDRADE, ANTONIO
ACCESS LEVEL: D

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	DIN	Effective Date	Description	Notes
	1	02/05/2025	DIVISION ASSIGNMENT	AH: Circuit Civil Central - AH (Civil)
 	2	02/05/2025	PAID \$411.00 ON RECEIPT 5649273	\$411.00 5649273 Fully Paid
 	3	02/05/2025	SUMMONS ISSUED	ISSUED TO ANTONIO DE ANDRADE ** HANDED TO PLT
 	4	02/05/2025	CIVIL COVER SHEET	
 	5	02/05/2025	COMPLAINT	FOR MALICIOUS PROSECUTION ABUSE OF PROCESS DEFAMATION AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS F/B PLT
 	6	02/06/2025	DCM DESIGNATION TO THE STREAMLINE TRACK WITH NON-JURY TRIAL ORDER	REID P. SCOTT 02/06/2025
 	7	02/10/2025	NOTICE AMISCUS CURIAE BRIEF IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON	AMISCUS CURIAE BRIEF IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON
 	8	02/10/2025	MOTION MOTION FOR LEAVE TO APPEAR AS AMICUS CURIAE IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON	MOTION FOR LEAVE TO APPEAR AS AMICUS CURIAE IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON
 	9	02/10/2025	NOTICE OF PENDING APPEAL IN RELATED CASE F/B PLT	OF PENDING APPEAL IN RELATED CASE F/B PLT
 	11	03/03/2025	RETURNED MAIL	AS TO MARCIO SOUSA SALES
 	10	03/04/2025	SERVICE RETURNED (NUMBERED)	ANTONIO DE ANDRADE SERVED ON 2/26/25

		12	03/10/2025	NOTICE OF APPEARANCE CIVIL	F/B ATTY KELLER OBO DFT ANTONIO DE ANDRADE
		13	03/18/2025	MOTION TO DISMISS	PLAINTIFFS COMPLAINT FILED BY DFT
		14	03/19/2025	MOTION TO REQUIRE DEFENDANT TO POST A BOND DUE TO FRAUDULENT ACTIONS BAD FAITH LITIGATION AND ABUSE OF PROCESS F/B PLT	TO REQUIRE DEFENDANT TO POST A BOND DUE TO FRAUDULENT ACTIONS BAD FAITH LITIGATION AND ABUSE OF PROCESS F/B PLT
		15	03/19/2025	MOTION TO SET DEADLINE FOR DISCOVERY RESPONSES AND PRESERVE EVIDENCE F/B PLT	TO SET DEADLINE FOR DISCOVERY RESPONSES AND PRESERVE EVIDENCE F/B PLT
		16	03/19/2025	COMPLAINT	AMENDED COMPLAINT TO CURE ANY PROCEDURAL DEFICIENCIES AND CLARIFY CLAIMS UNDER LIBERAL CONSTRUCTION DOCTRINE F/B PLT
		17	03/19/2025	NOTICE OF FILING	EXHIBIT - DEFENDANT'S COUNSEL'S MISLEADING STATEMENTS AND INTIMIDATION TACTICS F/B PLT
		18	03/19/2025	MOTION FOR SANCTIONS AGAINST DEFENDANT'S COUNSEL FOR BAD FAITH LITIGATION, INTIMIDATION, AND MISREPRESENTATIONS F/B PLT	FOR SANCTIONS AGAINST DEFENDANT'S COUNSEL FOR BAD FAITH LITIGATION, INTIMIDATION, AND MISREPRESENTATIONS F/B PLT
		19	03/24/2025	REPLY/RESPONSE	IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS F/B PLT
		20	03/24/2025	COMPLAINT	SECOND AMENDED F/B PLT
		21	03/27/2025	NOTICE OF HEARING	NOTICE OF REMOTE HEARING 04/10/2025 08:45:00 AM
		22	03/28/2025	COMPLAINT	SECOND AMENDED F/B PLT
		23	03/28/2025	MOTION TO STAY HEARING ON DEFENDANT'S MOTION TO DISMISS AND TO DENY/STRIKE DEFENDANT'S MOTION AS MOOT F/B PLT	TO STAY HEARING ON DEFENDANT'S MOTION TO DISMISS AND TO DENY/STRIKE DEFENDANT'S MOTION AS MOOT F/B PLT
		24	03/28/2025	NOTICE OF CANCELLATION	NOTICE OF CANCELLATION OF HEARING 04/10/2025
		25	03/31/2025	NOTICE OF ACKNOWLEDGMENT OF CANCELLATION OF HEARING F/B PLT	OF ACKNOWLEDGMENT OF CANCELLATION OF HEARING F/B PLT



JOSEPH ABRUZZO

CLERK OF THE CIRCUIT COURT & COMPTROLLER
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	2	02/05/2025 PAID \$411.00 ON RECEIPT 5649273	\$411.00 5649273 Fully Paid
	3	02/05/2025 SUMMONS ISSUED	ISSUED TO ANTONIO DE ANDRADE ** HANDED TO PLT
	4	02/05/2025 CIVIL COVER SHEET	
	5	02/05/2025 COMPLAINT	FOR MALICIOUS PROSECUTION ABUSE OF PROCESS DEFAMATION AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS F/B PLT
	6	02/06/2025 DCM DESIGNATION TO THE STREAMLINE TRACK WITH NON-JURY TRIAL ORDER	REID P. SCOTT 02/06/2025
	7	02/10/2025 NOTICE AMISCUS CURIAE BRIEF IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON	AMISCUS CURIAE BRIEF IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON
	8	02/10/2025 MOTION MOTION FOR LEAVE TO APPEAR AS AMICUS CURIAE IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON	MOTION FOR LEAVE TO APPEAR AS AMICUS CURIAE IN SUPPORT OF PLAINTIFF MARCIO SOUSA SALES F/B ROGERIO SCOTTON
	9	02/10/2025 NOTICE OF PENDING APPEAL IN RELATED CASE F/B PLT	OF PENDING APPEAL IN RELATED CASE F/B PLT
	11	03/03/2025 RETURNED MAIL	AS TO MARCIO SOUSA SALES
	10	03/04/2025 SERVICE RETURNED (NUMBERED)	ANTONIO DE ANDRADE SERVED ON 2/26/25

		12	03/10/2025	NOTICE OF APPEARANCE CIVIL	F/B ATTY KELLER OBO DFT ANTONIO DE ANDRADE
		13	03/18/2025	MOTION TO DISMISS	PLAINTIFFS COMPLAINT FILED BY DFT
		14	03/19/2025	MOTION TO REQUIRE DEFENDANT TO POST A BOND DUE TO FRAUDULENT ACTIONS BAD FAITH LITIGATION AND ABUSE OF PROCESS F/B PLT	TO REQUIRE DEFENDANT TO POST A BOND DUE TO FRAUDULENT ACTIONS BAD FAITH LITIGATION AND ABUSE OF PROCESS F/B PLT
		15	03/19/2025	MOTION TO SET DEADLINE FOR DISCOVERY RESPONSES AND PRESERVE EVIDENCE F/B PLT	TO SET DEADLINE FOR DISCOVERY RESPONSES AND PRESERVE EVIDENCE F/B PLT
		16	03/19/2025	COMPLAINT	AMENDED COMPLAINT TO CURE ANY PROCEDURAL DEFICIENCIES AND CLARIFY CLAIMS UNDER LIBERAL CONSTRUCTION DOCTRINE F/B PLT
		17	03/19/2025	NOTICE OF FILING	EXHIBIT - DEFENDANT'S COUNSEL'S MISLEADING STATEMENTS AND INTIMIDATION TACTICS F/B PLT
		18	03/19/2025	MOTION FOR SANCTIONS AGAINST DEFENDANT'S COUNSEL FOR BAD FAITH LITIGATION, INTIMIDATION, AND MISREPRESENTATIONS F/B PLT	FOR SANCTIONS AGAINST DEFENDANT'S COUNSEL FOR BAD FAITH LITIGATION, INTIMIDATION, AND MISREPRESENTATIONS F/B PLT
		19	03/24/2025	REPLY/RESPONSE	IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS F/B PLT
		20	03/24/2025	COMPLAINT	SECOND AMENDED F/B PLT
		21	03/27/2025	NOTICE OF HEARING	NOTICE OF REMOTE HEARING 04/10/2025 08:45:00 AM
		22	03/28/2025	COMPLAINT	SECOND AMENDED F/B PLT
		23	03/28/2025	MOTION TO STAY HEARING ON DEFENDANT'S MOTION TO DISMISS AND TO DENY/STRIKE DEFENDANT'S MOTION AS MOOT F/B PLT	TO STAY HEARING ON DEFENDANT'S MOTION TO DISMISS AND TO DENY/STRIKE DEFENDANT'S MOTION AS MOOT F/B PLT
		24	03/28/2025	NOTICE OF CANCELLATION	NOTICE OF CANCELLATION OF HEARING 04/10/2025
		25	03/31/2025	NOTICE OF ACKNOWLEDGMENT OF CANCELLATION OF HEARING F/B PLT	OF ACKNOWLEDGMENT OF CANCELLATION OF HEARING F/B PLT

EMERGENCY MOTION TO STRIKE IMPROPER POST-DISMISSAL FILINGS, BAR FURTHER
ACTION IN CLOSED CASE, AND NOTICE OF FEDERAL ESCALATION AND JUDICIAL
MISCONDUCT

Exhibit D

Link to publicly available blog article and video report titled: “The Judge Who Covered the Wrong to Punish the Innocent”, detailing this case’s systemic irregularities and its wider legal implications

<https://legalhelp4y.com/legal-h4y-blog/f/the-judge-who-covered-the-wrong-to-punish-the-innocent>



Legal Help 4 You Blog

< Todas as postagens

The Judge Who Covered the Wrong to Punish the Innocent:

6 de junho de 2025

The Ongoing Legal Lynching of Marcio Sousa Sales





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due process, dignity, and basic constitutional rights. This is not just a case of legal oversight. This is a case of judicial bias, attorney misconduct, and an institutional refusal to recognize and rectify the truth.

At the heart of this miscarriage of justice lies a man named Antonio de Andrade—who, through his attorney Seth R. Keller of Keller Gibson PLLC, brought a fraudulent and frivolous lawsuit against Marcio Sousa Sales in a prior small claims court proceeding (Case No. 50-2023-SC-011007). The lawsuit was riddled with legal flaws from the outset: Andrade failed to sue the proper party (the LLC), failed to serve process according to law, and during the hearing, Marcio's son—not Marcio—was questioned and tried. Despite these glaring violations, the court proceeded and granted judgment against Marcio. The appeals court has allowed that ruling to languish for months with no meaningful progress, further denying Marcio access to justice.



reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE COUNTY COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

Case # 23 SC11007

Judge Coner, Reginald

Plaintiff Antonio De Andrade
545 S Lake Dr. Lantana FL 33462
vs.

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In response, Marcio filed a civil complaint for malicious prosecution, defamation, and emotional distress against Andrade (Case No. 50-2025-CA-000969), which was immediately met with a hostile courtroom environment. The trial judge, Reid P. Scott, systematically ignored over seven motions filed by Marcio. These included properly filed objections to hearings, notices of legal violations, and motions supported by legal authority. Meanwhile, every motion by Andrade's attorney—no matter how procedurally improper or harassing—was allowed, entertained, or even granted.



(Fictitious Name; Registration # G22000133007) and was located at 3341 N. Dixie Hwy. Pompano Beach Fl, 33064. The owner of the fictitious business name is **STR Sunrise Truck Repair LLC (Document #: L22000294691/Registered Agent Name: Sales, Marcio, Jr/Address: 22187 AQUILA ST BOCA RATON, FL 33428).**

The services provided on my vehicle included a purchase of a motor, which included a 3-month warranty, with installation. Along with that, my vehicle was also serviced with an oil change and semi-met pads. I was advised that a down payment needed to be made to begin services and I made an initial payment in the amount of **\$3,210.00** on **12/12/22** to Marcio via Zelle transfer, associated with the phone number (561-289-7793). The following payments were made on **1/9/23** in the amount of **\$2,700.00** via Zelle transfer associated with the phone number (561-909-8184) and the final payment was made on the day of pick up on **1/13/23**, in the amount of **\$950.00**

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Judge Scott conducted a hearing that was neither lawfully scheduled nor judicially approved—one that Marcio had explicitly objected to in writing. When Marcio was unable to attend due to a family funeral, Judge Scott dismissed the case without prejudice, ignoring the pending objections, motions to strike, and notices that the case was already under appeal. The court's conduct defied every principle of procedural fairness. The hearing went forward without jurisdiction. And the judge, who refused to acknowledge a single motion by the pro se plaintiff, effectively handed control of the courtroom to the opposing counsel.



Reid P. Scott II



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already been objected to, already debated, and already mooted by the dismissal and pending appellate review. The audacity of this lawyer to attempt to sanction a pro se party for raising valid, fact-based claims—while knowing the defendant in the original case was never properly sued, served, or even present in trial—borders on legal terrorism.

Make no mistake: this is not about legal skill. This is about systemic abuse. If Marcio Sousa Sales had been represented by a licensed attorney, this never would have happened. The law was on his side. The facts were clear. But courts like this don't want to be embarrassed by a pro se litigant who dares to know the law and cite it correctly. And so, in a pattern as old as injustice

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Aceitar

March 14, 2025

Sent by email to: unionmoving@hotmail.com and info@legalhelp4y.com

Sent by USPS First class mail, and by certified mail, return receipt requested to:

Marcio Sousa Sales
22187 Aquila Street
Boca Raton, FL 33528

Case No. 50-2025-CA-000969-XXXXA-MB
Case Name: Marcio Sousa Sales V. Antonio De Andrade

Re: Formal demand pursuant to Fla. Stat. § 57.105 to dismiss your complaint with prejudice.

Dear Mr. Sales,

This Law Firm represents Antonio De Andrade in the above-mentioned matter. For your review, and pursuant to Fla. Stat. § 57.105, we have the enclosed motion entitled "Defendant Antonio De Andrade's Motion for Sanctions for Raising Frivolous Claims Unsupported in Law and Fact Directed to Plaintiff Marcio Sousa Sale", which we will file if your case is not dismissed with prejudice within 21 days.

Very Truly Yours,

Let's also be clear about the danger of Attorney Seth Keller's conduct. He has filed harassing motions. He has suggested—without evidence—that Marcio is receiving unauthorized legal



The Florida Bar, the Chief Judge of the 13th Judicial Circuit, and the appellate courts must be made aware. If the court continues to refuse to rule on valid motions, and allows improper hearings and sanction requests to proceed, it becomes complicit. This is no longer a civil dispute. This is a violation of civil rights under color of law.

The time for silence is over. The time for exposure is now.

Compartilhar esta publicação:



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Aceitar

“When Truth Is Not Enough”:

5 de jun. de 2025

A Nova Lei Italiana de Cidadania:

31 de mar. de 2025

Expose the Corruption: Download Court Orders, Motions & Appeals

EMERGENCY MOTION TO STRIKE IMPROPER POST-DISMISSAL FILINGS, BAR FURTHER
ACTION IN CLOSED CASE, AND NOTICE OF FEDERAL ESCALATION AND JUDICIAL
MISCONDUCT

Exhibit E

Exhibit E – Formal Judicial Qualifications Commission complaint filed against Judge Scott on June 20, 2025, documenting his failure to rule on pro se motions, false statement on the record, and unlawful dismissal based on a hearing that was never properly noticed.

In the matter of Marcio Sousa Sales vs. Antonio de Andrade

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT
**IN THE CIRCUIT OF THE 15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA**

MARCIO SOUSA SALES,

Plaintiff,

CASE NO: 50-2025-CA-000969-XXXX-MB

vs.

ANTONIO DE ANDRADE,

Defendant,

_____/

FLORIDA JUDICIAL QUALIFICATIONS COMMISSION

1110 Thomasville Road

Tallahassee, FL 32303

Email: contact@floridajqc.com

Phone: (850) 488-1581

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT


Judge: Reid P Scott

Court: 15th Judicial Circuit, Palm Beach County

Case: Marcio Sousa Sales v. Antonio de Andrade 50-2025-CA-000969-XXXX-MB

Filed by:

Marcio Sousa Sales (Pro Se Litigant)

 Email: info@legalhelp4y.com

Address: 160 W Camino Real # 102 Boca Raton, Florida 33432

Phone: (786) 588-1202

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

I. INTRODUCTION

This complaint is being filed against **Judge Reid P Scott** for **serious judicial misconduct, denial of due process, and improper favoritism toward a licensed attorney**, resulting in constitutional violations and significant prejudice against a pro se litigant.

II. FACTUAL BACKGROUND

Plaintiff Marcio Sousa sales was named as the Defendant in a lawsuit filed by Antonio de Andrade under Case 50-2025-CA-000969-XXXXA-MB. The lawsuit was **wrongfully filed against Marcio Sousa Sales personally**, despite the fact that he had **no legal ownership, involvement, or connection** with LLC that provided the disputed services. The actual party involved was his adult son and his legally formed LLC company, yet **Mr. Sales was personally sued** in error. Worse, his son was tried. This clear **failure to name the proper party** was ignored by Judge Scott, despite my repeated filings raising this issue.

III. SUMMARY OF JUDICIAL MISCONDUCT

1. No Rulings Issued on 10 plus Motions Filed by Pro Se Litigant

Throughout the case, Mr. Sales filed at least **twelve (10) motions**, including:

- Motions to strike improper § 57.105 filings,

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

- Objections to unlawful hearing scheduling,
- Motions for reconsideration, dismissal, or clarification.

Judge Scott did not rule on a single motion. Not one. This constitutes a direct violation of **Canon 3B(8)** of the Florida Code of Judicial Conduct, which mandates that a judge must dispose of matters "**promptly, efficiently, and fairly.**"

2. False Statement on the Record – Judicial Misrepresentation

On the date of dismissal (**May 15, 2024**), Judge Scott stated that he had **“reviewed all documents on the case.”**

This was a **false statement**, since:

- **No motion by the pro se litigant had been ruled on, and**
- **Several of them were critical procedural motions** raising jurisdiction, bias, and improper hearing conduct.

This misrepresentation on the record appears to be an intentional attempt to **cover up judicial neglect** and shield the licensed attorney from scrutiny.

3. Unlawful Dismissal Based on Factual Misconduct

Judge Scott dismissed the case **without prejudice** based on the statement that Marcio Sousa sales, pro se "failed to appear" at a hearing. However:

- **No court order was ever issued granting the hearing;**

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

- **No notice of hearing was formally served upon pro se Plaintiff;**
- The Plaintiff had already filed a **formal objection** to the hearing being scheduled by the attorney in violation of due process;
- The hearing was set **unilaterally**, and Mr. Sales was never properly advised or allowed to participate.

This dismissal violated Mr. Marcio Sales **constitutional right to be heard** and directly contradicts **Rule 1.090(d), Florida Rules of Civil Procedure** (requiring notice and fair opportunity to respond before action is taken).

4. Systemic Bias Against a Pro Se Litigant and Favoritism Toward a Licensed Attorney

Judge Scott's conduct reflects a **pattern of systemic bias**:

- Ignoring all motions of the pro se defendant;
- Refusing to address clear legal errors (wrong party sued, mistaken identity);
- Allowing a licensed attorney to manipulate court hearings while evading judicial scrutiny;
- Dismissing the case without a hearing that was never lawfully noticed;
- Making false claims about reviewing the record.

These actions show **not just neglect, but a judicial cover-up to protect a fellow member of the Bar.**

5. Ongoing Damage, Retaliation, and Abuse of the Judicial System

Since that wrongful dismissal:

- I have filed a **new lawsuit properly** under Case No. **50-2025-CA-005676**;

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

- Mr. Sales have filed **two separate appeals**, including DCA Case Nos. **4D2025-1600** and **4D2024-3229**;
- The same opposing attorney has **attempted to schedule improper sanctions hearings** in the closed case — and **Judge Scott has taken no action to stop it**;
- I have incurred additional costs, delay, and stress fighting abuse of process enabled by the court itself.

This judicial passivity and favoritism undermine the **integrity of the court system** and must be formally investigated.

IV. REQUESTED ACTION BY THE JQC

Mr. Marcio Sales respectfully request that the JQC:

- **Investigate Judge Scott's failure to rule on motions** in this matter;
- Review the **false statements made on the record** regarding having reviewed filings;
- Examine the court's **failure to provide hearing notice and opportunity to be heard**;
- Determine whether **judicial bias or preferential conduct** occurred in favor of licensed attorneys;
- Take any corrective, disciplinary, or public accountability measures necessary.

Mr. Sale also intend to file supporting documentation including **filings, court audio, transcripts, and docket history** proving these failures.

FORMAL COMPLAINT OF JUDICIAL MISCONDUCT

V. PUBLIC INTEREST

This matter has been raised publicly via **press releases, legal blogs, and social media**, and is drawing attention as an example of how **Florida courts often fail to protect pro se litigants** and instead shield misconduct by officers of the court.

This is not just about one case — it is about restoring **public confidence in fairness and due process**.

Respectfully Submitted,

Marcio Sousa Sales
22187 Aquila Street
Boca Raton, FL 33528
(561) 909-8184

Exhibit F

Improper Filing and Unauthorized Appearance by Brandon J. Gibson, Esq.

which includes a copy of the motion signed and submitted by Brandon J. Gibson, Esq. — who, at the time of filing and hearing, had not entered a Notice of Appearance on behalf of Defendant Antonio de Andrade as required under Rule 2.505(e), Florida Rules of General Practice and Judicial Administration.

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

MARCIO SOUSA SALES,

Plaintiff,

v.

CASE NO.: 50-2025-CA-000969-XXXXA-MB

ANTONIO DE ANDRADE,

Defendant.

_____/

DEFENDANT'S AMENDED MOTION FOR AN AWARD OF ATTORNEY'S FEES

Defendant, Antonio DeAndrade ("Defendant"), through his undersigned counsel and pursuant to 1.525, Fla. R. Civ. P., move for an award taxing attorney's fee in connection with this lawsuit against Plaintiff, Marcio Sousa Sales, ("Plaintiff") and in support thereof, state as follows:

1. Plaintiff filed his Complaint on February 5, 2025, and filed his operative second amended Complaint on March 24, 2025.
2. On April 14, 2025, Defendant filed his motion to dismiss Plaintiff's Second Amended Complaint.
3. Following a hearing on Defendant's motion to dismiss held on May 14, 2025, the Court granted the motion, and entered an order on dismissing the Plaintiff's Complaint without prejudice the following day. *A true and correct copy of the order is attached hereto as Exhibit A.*
4. Prior to the entry of the order, Defendant filed a motion for sanctions, on May 12, 2025, pursuant to Fla. Stat § 57.105, alleging that Plaintiff's Amended Complaint lacks and justiciable issue of either law or fact.

5. Fla Stat § 57.105 (1) provides:

Upon the court's initiative or motion of any party, the court shall award a reasonable attorney's fee, including prejudgment interest, to be paid to the prevailing party in equal amounts by the losing party and the losing party's attorney on any claim or defense at any time during a civil proceeding or action in which the court finds that the losing party or the losing party's attorney knew or should have known that a claim or defense when initially presented to the court or at any time before trial:

- (a) Was not supported by the material facts necessary to establish the claim or defense; or
- (b) Would not be supported by the application of then-existing law to those material facts.

6. The motion for sanction is being set for hearing.

7. Plaintiff is aware that if Defendant is the prevailing party as to his motion he will be entitled to an award of reasonable attorney's fees.

8. KellerGibson, PLLC, has represented Defendant throughout this matter on an hourly basis.

Wherefore, Defendant Antonio DeAndrade respectfully requests this Court to enter an Order granting the instant motion for entitlement and awarding his reasonable attorney's fees incurred during this lawsuit, and any such further relief as the Court deems fair and just.

Respectfully submitted,

s/Brandon J. Gibson

Brandon J. Gibson

Florida Bar No.: 0099411

E-mail: bgibson@kellergibson.com

Seth R. Keller

Florida Bar No.: 0091751

E-mail : seth@kellergibson.com

KELLERGIBSON, PLLC

3800 Inverrary Blvd, Ste. 400D

Lauderhill, Florida 33319

Telephone: (954) 237-8093
Facsimile: (954) 637-6855

Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion for and award of attorney's fees has been furnished via email info@legalhelp4u.com to Marcio Sousa Sales on this 5th day of June 2025.

NOT A CERTIFIED COPY

Exhibit A

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

MARCIO SOUSA SALES,

Plaintiff,

v.

CASE NO.: 50-2025-CA-000969-XXXXA-MB

ANTONIO DE ANDRADE,

Defendant.

ORDER ON DEFENDANT'S MOTION TO DIMSISS

THIS CAUSE having come before the Court on the Defendant, ANTONIO DE ANDRADE's Motion to Dismiss Plaintiff's Complaint, having reviewed the Motion, Plaintiff's Response in opposition, Plaintiff's notice of supplemental authority in opposition to the motion to dismiss, Plaintiff's notice of objection to hearing and request for ruling based on submitted memoranda, and having heard arguments of counsel at a hearing on May 14, 2025, noting that Plaintiff failed to appear, and the Court being otherwise fully advised in the premises, it is hereby:

ORDERED AND ADJUDGED as follows:

1. Defendant's Motion to Dismiss is **GRANTED without prejudice**.

DONE and ORDERED in Chambers at Palm Beach County, Florida.

502025CA000969XXXXAMB 05/14/2025
Reid P. Scott Judge
ADMINISTRATIVE OFFICE OF THE COURT

502025CA000969XXXXAMB 05/14/2025
Reid P. Scott
Judge

cc: All Attorneys of Record

Plaintiff, Marcio Sousa Sales, info@legalhelp4y.com, unionmoving@hotmail.com; 22187

Aquila Street, Boca Raton, FL 33528

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 50-2025-CA-000969-XXA-MB

MARCIO SOUSA SALES

Plaintiff

v.

ANTONIO DE ANDRADE

Defendant

NOTICE OF APPEARANCE

Seth R. Keller, Esq. of Keller Gibson, PLLC., hereby gives his notice of appearance as counsel of record for the Defendant, ANTONIO DE ANDRADE. (hereinafter "Defendant"), in this action. All future notices should be sent to Keller Gibson, PLLC at 3800 Inverrary Blvd., Ste 400-D, Lauderhill, Florida 33319. Pursuant to Rule 2.516 of the Florida Rules of General Practice and Judicial Administration, primary service by email is designated as: seth@kellergibson.com.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent electronically through the e-filing filing portal, this 10 day of March 2025, upon all parties of record.

Respectfully Submitted,

Keller Gibson, PLLC
3800 Inverrary Blvd., Ste 400-D
Lauderhill, FL 33319
Office: 954-999-5769
Fax: 954-206-0144
Primary E-Mail Address: seth@kellergibson.com.

By: /s/ Seth R Keller
Seth R. Keller
FL BAR NO. 91751