

Appeal In the matter of MARCIO SOUSA SALES vs. ANTONIO DE ANDRADE.

RE: 50-2023-SC-011007-XXXX-SB

APPELLANT’S MOTION TO CONSOLIDATE RELATED APPEALS

NO: 4D2024-3229

**IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA FOURTH
DISTRICT**

MARCIO SOUSA SALLES,

Appellant,

V.

HO. JUDGE REGINALD CORLEW,

as Judge of the Circuit Court of Palm Beach County, Florida,

AND

ANTONIO DE ANDRADE,

Appellee.

**APPELLANT’S MOTION TO CONSOLIDATE
RELATED APPEALS**

MARCIO SOUSA SALLES, PRO SE

22187 AQUILA STREET

BOCA RATON, FLORIDA 33528

APPELLANT'S MOTION TO CONSOLIDATE RELATED APPEALS

COMES NOW the Appellant, Marcio Sousa Sales, pursuant to Florida Rule of Appellate Procedure 9.300, and hereby respectfully moves this Honorable Court to consolidate the above-captioned cases, Case No. **4D2024-3229** and Case No. **4D2025-1600**, both pending before this Court. In support thereof, the Appellant states as follows:

1. Appellant is the same party in both appeals. Appellee Antonio De Andrade is also the same party in both actions.
2. Case No. 4D2024-3229 is an appeal from a final judgment entered in a County Court action, where the lower court rendered judgment against Appellant Marcio Sousa Sales despite the underlying legal and procedural error of having sued the wrong party.
3. Case No. 4D2025-1600 is an appeal from the dismissal without prejudice of Appellant's subsequent lawsuit filed in Circuit Court against the same party, Antonio De Andrade. That complaint sought to correct the injustice suffered in the previous case and to hold the proper party accountable.
4. These two appeals arise from the same factual nucleus and involve overlapping legal arguments, including improper service, lack of standing, due process violations, attorney misconduct, and judicial bias.

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5. Consolidation is in the interest of judicial economy and efficiency, as it will avoid conflicting rulings, reduce duplicative briefings, and promote comprehensive review of the interrelated claims.

6. Allowing these cases to proceed separately risks inconsistent outcomes, as the second appeal directly stems from the flawed adjudication and post-judgment actions that occurred in the first.

7. Consolidation will not prejudice the Appellee, but rather will facilitate streamlined review and ensure fairness.

WHEREFORE, the Appellant respectfully requests that this Honorable Court enter an Order consolidating Appeal Case Nos. 4D2024-3229 and 4D2025-1600 for all appellate purposes.

Respectfully submitted,

MARCIO SOUSA SALLES, PRO SE
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BOCA RATON, FLORIDA 33528

APPELLANT’S MOTION TO CONSOLIDATE RELATED APPEALS

Certificate of Service

I hereby certify that on June 11, 2025, a true and correct copy of the foregoing APPELLANT’S MOTION TO CONSOLIDATE RELATED APPEALS was furnished via electronic e-mail to the following:

Antonio De Andrade

Email: tjmarble@yahoo.com

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Certificate of Compliance

I hereby certify that this Motion complies with the font and word limit requirements of Florida Rule of Appellate Procedure 9.045(b) and Rule 9.300(a).

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