

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

UPSTATE HOLDINGS LLC,

Plaintiff,

Case No.:

v.

STATE STORAGE LUBBOCK LLC,

Defendant.

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**COMPLAINT**

Plaintiff, UPSTATE HOLDINGS LLC, (“Plaintiff”), by and through the undersigned counsel, sues STATE STORAGE LUBBOCK LLC (“Defendant”) and alleges as follows:

**JURISDICTION AND VENUE**

1. Plaintiff, UPSTATE HOLDINGS LLC is a Florida Limited Liability Company with its principal address in Largo, Pinellas County, Florida.
2. STATE STORAGE LUBBOCK LLC, is a Florida Limited Liability Company with its principal address in Largo, Pinellas County, Florida.
3. This Court has subject matter jurisdiction pursuant to Section 605.0411, Florida Statutes.
4. Venue is proper in Pinellas County, as that is the principal place of business of Defendant.

**ACTION FOR INSPECTION PURSUANT TO SEC. 605.0411, FLA. STAT.**

5. This is an action for Court-ordered inspection pursuant to Section 605.0411, Fla. Stat.
6. Plaintiff, UPSTATE HOLDINGS LLC, is a member of STATE STORAGE

LUBBOCK LLC and authorized to bring this action.

7. On or about September 22, 2025, Plaintiff sent Defendant a request to inspect its books and records, pursuant to Section 605.0410, Fla. Stat. See letter, attached as Exhibit "A."
8. Defendant did not allow Plaintiff to inspect the books and records requested.
9. Plaintiff has retained the undersigned attorney to represent it in this matter, and is obligated to pay its reasonable attorney fees and costs in connection with this matter.

WHEREFORE, Plaintiff requests that the Court order an inspection and copying of the record demanded under Section 605.0410, Fla. Stat., award Plaintiff its reasonable attorney fees and costs incurred in this action, and for such other and further relief as this Court deems fair and just.

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