

**IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

5501 NE 2ND AVENUE, LLC,  
a Florida limited liability company,

CIVIL DIVISION

Plaintiff,

CASE NO.:2020-018438-CC-05

vs.

DISTRICT LIVE AGENCY, LLC,  
d/b/a CHURCHILL'S PUB,  
a Florida limited liability company,  
and all others in possession,

Defendant.

**--and--**

DISTRICT LIVE AGENCY, LLC,  
a Florida limited liability company; and  
THE BEVERAGE GROUP, LLC  
a Florida limited liability company

Counter-Plaintiffs,

vs.

5501 NE 2<sup>ND</sup> AVENUE, LLC,  
A Florida limited liability company;  
LITTLE HAITI DEVELOPMENT PARTNERS, LP,  
A Florida limited partnership;

Counter-Defendants.

**MOTION TO TRANSFER TO CIRCUIT COURT**

Counter-Plaintiff/Defendant District Live Agency, LLC ("DLA") by and through their undersigned counsel, hereby files this Motion ("Motion") to Transfer Case to Circuit Court and state as follows:

1. This is a commercial landlord-tenant dispute.
2. The Complaint was originally filed in County Court and given case number 2020-018438-CC-05 by the Clerk of the Court.

3. DLA has filed Counterclaims in the present action for which all filing fees have been paid and the Counterclaims have been docketed.

4. The relief sought in the Counterclaims exceeds this Court's jurisdictional amount of \$ 30,000.00. Therefore, the appropriate place for the subject action to be heard is within the jurisdiction of the Circuit Court. See Fla. R. Civ. P. 1.170(j); A-One Laundry Equipment Co. v. Waterside Towers Condominium Ass'n, Inc., 561 So. 2d 591-93 (Fla.3d DCA 1990).

5. Accordingly, the instant case must be transferred to the Miami-Dade County Circuit Court, pursuant to the Florida Rules of Civil Procedure and authority cited herein.

WHEREFORE, District Live Agency, LLC respectfully requests that this Honorable Court enter an Order granting its Motion to Transfer Case to Circuit Court, and for such other and further relief this Court deems just and proper.

Dated: October 23, 2020

GENOVESE JOBLOVE & BATTISTA, P.A.  
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By: /s/ Omar K. Bradford  
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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was served by Florida Courts e-filing portal to Hilary R. Zalman, Esq., [eService@ZalmanLawFirm.com](mailto:eService@ZalmanLawFirm.com), Zalman Law, P.A. 7050 Montrico Drive, Boca Raton, FL 33433, on this 23 day of October, 2020.

By /s/ Omar K. Bradford  
Omar K. Bradford, Esq.