

IN THE COUNTY COURT, SEVENTH JUDICIAL CIRCUIT,
IN AND FOR VOLUSIA COUNTY, FLORIDA

Case No.: 2024 29084 CODL
Judge: Angela A. Dempse
Division: 71

JEREMIAH MATTHEW ANDERSON,
Plaintiff,
v.
WESTLAKE FINANCIAL SERVICES,
Defendant.

**EMERGENCY MOTION TO AMEND/CORRECT THE WRIT OF REPLEVIN
AND NOTICE OF VEHICLE LOCATION**

COMES NOW, the Plaintiff, **Jeremiah Matthew Anderson**, proceeding pro se, and respectfully moves this Honorable Court for an **Emergency Order** amending and/or correcting the Writ of Replevin previously issued in this case. In support thereof, Plaintiff states as follows:

1. Incorrect VIN in the Original Writ

- The Writ of Replevin currently on record with this Court lists the Vehicle Identification Number (VIN) as **1FT8W4DT0KED23046**, which is incorrect.
- The correct VIN for Plaintiff's vehicle is **1FT8W4DTXBEC16473**.

2. Recent Location of the Vehicle

- On January 20, 2025, Plaintiff observed the subject vehicle being driven east on State Road 46 near the intersection of SR 415.
- A Seminole County Sheriff's Deputy, identified as Deputy Rick Hearsay, was called to the scene to verify the Writ of Replevin. Upon checking the VIN, it was apparent the Writ's VIN and the vehicle's VIN did not match.
- The individual driving the vehicle followed Plaintiff to the dealership currently possessing it, identified as:

- American Performance Motorsports Inc
- 3725 Naseem Lane
- Sanford, Florida 32771

- The dealership's on-site manager (referred to by staff as the "boss man") was informed in front of at least two witnesses that the Writ of Replevin had been issued, but the VIN was incorrect. The manager was further notified that the vehicle is the subject of a wrongful repossession claim and is actively being searched for in order to be recovered. .

3. Urgent Need for Corrected Writ

- Given that the dealership is a licensed automobile dealer, it has the capability to sell or transfer the vehicle unless formally prevented from doing so.
- Plaintiff has put the dealership on notice that any sale of the vehicle, now that its true legal status is known, may constitute the willful sale of stolen property.

CLERK OF THE CIRCUIT
& COUNTY COURT VOLUSIA COUNTY, FL
CC 54

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- An amended Writ of Replevin reflecting the correct VIN is urgently needed so law enforcement may properly execute the order and prevent any further harm or transfer of the vehicle.

4. Good Cause for Emergency Relief

- Allowing time to lapse without correcting the VIN and clarifying the vehicle's status poses a substantial risk of irreparable harm to Plaintiff should the vehicle be sold to an unsuspecting third party.
- Immediate amendment of the Writ is necessary to reflect the correct VIN, ensure proper enforcement, and safeguard Plaintiff's property rights.

WHEREFORE, **Plaintiff** respectfully requests that this Honorable Court:

1. **Grant this Emergency Motion** and issue an **Amended/Corrected Writ of Replevin** listing the proper VIN, **1FT8W4DTXBEC16473**.
2. **Authorize and Direct** the appropriate law enforcement agency to immediately serve and enforce the corrected Writ at **American Performance Motorsports Inc, 3725 Naseem Lane, Sanford, Florida 32771**, or wherever else the vehicle may be found.
3. **Order** that no sale or transfer of the vehicle be permitted until this matter is fully resolved.
4. **Grant any further relief** the Court deems just and proper under the circumstances.

Dated this 20th day of January, 2025.

Respectfully submitted,

Jeremiah Matthew Anderson

3634 Watermelon Lane

New Smyrna Beach, Florida 32168

Plaintiff, Pro Se



CERTIFICATE OF SERVICE

NOTE: At this time I do not know who to send a Certificate of Service to for this document as the case is shown as closed on the online portal and the defendant has not shown or responded to any notices or hearings. I will send it to the defendant to the same address as before.

I HEREBY CERTIFY that a true and correct copy of the foregoing Emergency Motion to Amend/Correct the Writ of Replevin and Notice of Vehicle Location was furnished via U.S. Mail, Certified Mail Return Receipt Requested, or via the Florida Courts e-Filing Portal (as appropriate) on this 20th day of January, 2025, to:

Westlake Financial
4751 Wilshire Blvd #100
Los Angeles, CA 90010