IN THE COUNTY COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR

DUVAL COUNTY, FLORIDA

CASE NO.: 16-2025-CC-012495-AXXX-MA

MARIE MOLEUS,

Plaintiff,

vs.

SLIDE INSURANCE COMPANY,

Defendant.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

**PLAINTIFF’S MOTION FOR DEFAULT**

COMES NOW the Plaintiff, MARIE MOLEUS (hereinafter “Plaintiff”), by and through undersigned counsel, and pursuant to Rule 1.500(a) of the Florida Rules of Civil Procedure, and files this Motion for Default, and in support thereof would state as follows:

1. On September 23, 2018, the Plaintiff commenced the above-styled cause of action against the Defendant, SLIDE INSURANCE COMPANY (hereinafter “Defendant”).
2. On October 17, 2018, the Chief Financial Officer of the State of Florida (hereinafter “Chief Financial Officer”) accepted service of process on behalf of the Defendant. See Notice of Service of Process attached hereto as Exhibit “A.”
3. On October 19, 2018, the Chief Financial Officer forwarded service by electronic delivery to the Defendant’s designated agent, Sean Downes. See again Exhibit “A”.
4. Pursuant to Rule 1.140(a)(1) of the Florida Rules of Civil Procedure, Defendant had twenty (20) days, or until November 8, 2016, to provide a responsive pleading to Plaintiff’s complaint.
5. However, on October 19, 2016, Defendant requested a thirty (30) day extension up to and including December 8, 2016 to respond to Plaintiff’s Complaint. See Email dated October 19, 2018, attached hereto as Exhibit “B”.
6. Plaintiff granted Defendant’s request for an extension.
7. On December 5, 2018, Defendant requested a second extension to respond to Plaintiff’s Complaint up through and including December 28, 2018. See Email dated December 5, 2018, attached hereto as Exhibit “C”.
8. Plaintiff again granted Defendant’s request for an extension.
9. To date, more than 50 days after Defendant’s Answer was due, Defendant has failed to serve any responsive pleadings in this matter as required by law.
10. Accordingly, pursuant to Rule 1.500(a), Fla. R. Civ. P., Plaintiff moves for entry of default against the Defendant for failure to serve any responsive pleading or paper in this matter, as required by law.

[*CERTIFICATE OF SERVICE ON NEXT PAGE*}

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Sean Downes, as the designated agent of the Defendant, SLIDE INSURANCE COMPANY, at: 1110 West Commercial Boulevard, Fort Lauderdale, FL 33309, on this \_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_, 2018.

Respectfully submitted,

**LOUIS LAW GROUP, LLC**

7951 Riviera Boulevard, Suite 103

Miramar, Florida 33023

Tel.: (954) 676-4179

Fax: (844) 272-7163

E-Service Email: [service@louislawgroup.com](mailto:service@louislawgroup.com)

Non-Service Email: [pierre@louislawgroup.com](mailto:pierre@louislawgroup.com)

Secondary Email: [rwashburn@louislawgroup.com](mailto:rwashburn@louislawgroup.com)

By: /s/ Ricco C. Washburn

PIERRE A. LOUIS, ESQ.

Florida Bar No.: 106481

RICCO C. WASHBURN, ESQ.

Florida Bar No.: 1001007

VALERIE L. RAPHAEL, ESQ.

Florida Bar No.: 1003514