

IN THE CIRCUIT COURT OF THE 10TH JUDICIAL CIRCUIT IN AND FOR POLK COUNTY,
FLORIDA
CIVIL DIVISION

GRANADA INSURANCE COMPANY,

Plaintiff,

-vs-

BATATA TRUCKING LLC; ANGEL
YADRIEL PEREZ RODRIGUEZ; AND
MARK COUCH,

Defendants.

CASE NO. 2023CA005042000000

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the Complaint for Declaratory Relief in this action on defendant:

BATATA TRUCKING LLC, by serving its registered agent, Angel M. Perez Gotay, 434 Arkansas Ct., Poinciana, FL 34759

Each defendant is required to serve written defenses to the Complaint for Declaratory Relief on the Plaintiff's attorney, whose address is:

PEDRO E. HERNANDEZ, Fla. Bar No. 30365, phernandez@hinshawlaw.com

DANIEL C. SHATZ, Fla. Bar No. 94696, dshatz@hinshawlaw.com

VERONICA GUERRA, Fla. Bar No. 119181, vguerra@hinshawlaw.com

HINSHAW & CULBERTSON, LLP

2525 Ponce de Leon Boulevard, 4th Floor, Coral Gables, FL 33134

Telephone: 305-358-7747 | Facsimile: 305-577-1063

within 20¹ days after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

DATED: 06/30/2023

STACY M. BUTTERFIELD
Clerk of the Circuit Court & Comptroller



By: 53-2023CA-005042-0000-00
6/30/2023 2:37:43 PM
Deputy Clerk

AMERICANS WITH DISABILITIES ACT OF 1990 ADA NOTICE

"If you qualify under the Americans with Disabilities Act (ADA) and need assistance within the court system, please visit Tenth Judicial Circuit of Florida website or use the following contact information: TDD Number (863) 534-7777; Voice Number (863) 534-4686. If you are hearing or voice impaired, please call 711 or 800-955-8770 for the Florida Relay Service.

¹ Except when suit is brought pursuant to section 768.28, Florida Statutes, if the State of Florida, one of its agencies, or one of its officials or employees sued in his or her official capacity is a defendant, the time to respond shall be 40 days. When suit is brought pursuant to section 768.28, Florida Statutes, the time to respond shall be 30 days.

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger. Vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

Plaintiff's Attorneys:

PEDRO E. HERNANDEZ, Fla. Bar No. 30365, phernandez@hinshawlaw.com

DANIEL C. SHATZ, Fla. Bar No. 94696, dshatz@hinshawlaw.com

VERONICA GUERRA, Fla. Bar No. 119181, vguerra@hinshawlaw.com

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