

IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION
CASE NO. CC05

Somerset Tower Apartments LLC
dba Jenny Tower Condominium Rentals
Plaintiff
-vs-

Keith Norman Lee Wallace
And All Others in Possession
Defendant(s).

COUNT I - TENANT EVICTION

Plaintiff sues Defendant(s), and states:

1. Plaintiff is authorized for business in this county.
2. Plaintiff owns real property in this county described as:
1545 NW 15 Street Road #1402
Miami, Florida 33125
3. Defendant(s) reside(s) in this county.
4. This is an action to evict Defendant(s) from the property.
5. Defendant(s) retain(s) possession of the property under a written agreement to pay rent of \$1475.00 per month payable on the first of each month. A copy of the lease is attached hereto as Exhibit "A".
6. Defendant(s) failed to pay August rent, in addition to late fees which are considered as additional rent.
7. Plaintiff served Defendant(s) with a notice on August 6, 2014 to either pay rent or deliver the premises, but Defendants refuse to do either. A copy of the Three Day Notice is attached hereto as Exhibit "B".
8. Defendant(s) owe(s) Plaintiff, the following: rent for the month(s) stated in paragraph 6, totaling \$1575.00, and rent as it becomes due.
9. Failure of Defendant(s) to pay rent as due caused Plaintiff to retain the undersigned attorneys to represent them in this action and to agree to pay said attorneys a reasonable fee for their services and costs, which Defendant(s) should pay pursuant to Florida Statute Sec. 83.48 and the lease agreement.

WHEREFORE, PLAINTIFF DEMANDS JUDGEMENT FOR POSSESSION OF THE PROPERTY AGAINST THE DEFENDANT(S) AND FOR OTHER JUST RELIEF INCLUDING COURT COSTS AND ATTORNEY'S FEES.

Dated: September 15, 2014

s/ Kenneth J. Lowenhaupt, Esq.
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