SUNWOOD, INC., Plaintiff(s),

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

VS.

POMPANO SENIOR SQUADRON FLYING CLUB, INC.,

Defendant(s),

CASE NO.: 21-003202 CACE 12

and
BANK OF AMERICA, N.A.,
Garnishee

ANSWER OF GARNISHEE AND
DEMAND TO PLAINTIFF FOR
PAYMENT OF ATTORNEY'S FEES

Garnishee, BANK OF AMERICA, N.A., by its undersigned attorney, Answers the Writ of Garnishment served on it as follows:

1. At the time of the service of the Writ of Garnishment, plus sufficient time not to exceed one business day for Garnishee to act expeditiously on the Writ, and at the time of its Answer and at all times between service and its Answer, Garnishee's records reflect the following account(s) which may be subject to the Writ of Garnishment:

Account Number(s)

Name on Account
Pompano Senior Squadron Flying Club
DBA Pompano Beach Flying Club
P.O. Box 10241
Pompano Beach, FL 33061-6241

2. Pursuant to provisions of Sections 77.06 (2) and (3) of Florida Statutes, and subject to Court determination of the proper disposition of proceeds of the above account(s), Garnishee has set aside the following sums:

Account Number(s)
xxxx-xxxx-1841

Amount Set Aside \$4.42

- 3. Except as provided in paragraph 2 (if applicable), Garnishee has no obligation to make, and has not made, a determination as to the ownership of the subject funds or as to whether any of the funds are subject to any exemption provided to Defendant(s) and/or other person or entities under Federal or State Law.
- 4. Garnishee knows of no other person indebted to Defendant(s) or any other person who may have any effects, goods, money or chattels of the said Defendant(s), nor did Garnishee

have in its possession or control any other tangible or intangible personal property of the Defendant(s).

In accordance with Section 77.28 as amended on July 1, 2014, and having filed 5. the Answer of Garnishee in this case, Garnishee hereby demands from Plaintiff the payment forthwith of the \$100.00 statutory garnishment fee for the part payment of its attorney's fees, to be made payable to The Noa Law Firm, P.A., Garnishee's attorney(s), and to GIAL GIR be mailed to:

THE NOA LAW FIRM, P.A. P. O. Box 941958 Miami, Florida 33194

WHEREFORE, Garnishee prays that this Court enter its judgment determining proper disposition of any funds held pursuant to the Writ of Garnishment and for the payment by Plaintiff forthwith of the \$100.00 statutory garnishment fee as part payment of Garnishee's attorney's fees, to be made payable to The Noa Law Firm, P.A., Garnishee's attorney(s), and for any other relief this Court deems just and proper.

## **DESIGNATION OF EMAIL ADDRESS**

Pursuant to Rule 2.516 of the Florida Rules of Judicial Administration, Counsel for Garnishee hereby designates the following primary email address for service of court documents: Primary email address: e-service@noalawfirm.com.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished via electronic mail this 27<sup>TH</sup> day of JUNE, 2022, to DANE T. STANISH, ESQ., ATTORNEY FOR PLAINTIFF, Email: stanishd@gmail.com.

> THE NOA LAW FIRM, P.A. ATTORNEY(S) FOR GARNISHEE P. O. Box 941958 Miami, Florida 33194 Telephone: (305)559-9620 Facsimile: (305)559-3611

By: ANA DIAZ NOA, ESQ., FBN 729299 [] JOSEPH A. NOA, JR., ESQ., FBN 81984 [] MICHAEL A. NOA, ESQ., FBN 93621