

IN THE COUNTY COURT, IN AND
FOR BROWARD COUNTY, FLORIDA

STEVEN J. BORER
MICHAEL W. BORER

Plaintiffs

vs.

Case No: COWE 20022099
Judge: Phoebe R. Francois
Division 81

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.

FBN 260800

Defendant

and

JPMORGAN CHASE BANK, N.A.

Garnishee

MOTION FOR WRIT OF GARNISHMENT

COMES NOW the Plaintiff, STEVEN J. BORER, by and through the undersigned attorney, and pursuant to §77.01 Florida Statutes respectfully moves the Clerk of the Court to issue a Writ of Garnishment directed to Garnishee, JPMORGAN CHASE BANK, N.A., c/o CT Corporation System, Registered Agent, 1200 South Pine Island Road, Plantation, FL 33324, and as grounds therefore alleges:

1. On April 7, 2021 a Final Judgment was entered in the above styled action in favor of Plaintiff and against Defendant, in the total sum of \$1,930.00, with interest to accrue at the statutory rate.
2. Defendant has not filed a Motion seeking a rehearing or a new trial.
3. Defendant has not filed a Motion to stay execution on the judgment.
4. Although Defendant has filed a Notice of Appeal from the judgment it has not

posted a supersedeas bond in any amount as to qualify for an automatic stay.

5. Plaintiff is entitled to have issue of a Writ of Garnishment as a matter of law.

6. No money has been paid by Defendant to Plaintiff, and the full amount awarded to Plaintiff in the sum of 1,930.00 on the face of the judgment, together with accrued post-judgment interest of \$7.52 as of the date of this Motion, for a total of \$1,937.52 5 due and owing, with interest continuing to accrue pursuant to §55.03 Florida Statutes.

7. Plaintiff has also incurred post-judgment court costs to which Plaintiff is entitled pursuant to §57.041 Florida Statutes.

8. Plaintiff anticipates and expects to recover the above stated sums, or a portion thereof, from these proceedings in garnishment.

WHEREFORE, Plaintiff requests the Clerk of the Court to comply with this Motion and issue a Writ of Garnishment directed to JPMORGAN CHASE BANK, N.A., c/o CT Corporation System, Registered Agent, 1200 South Pine Island Road, Plantation, FL 33324, forthwith.

Dated on May 10, 2021.

/s/ Jeffrey B. Lampert
JEFFREY B. LAMPERT, Esquire
Attorney for Plaintiff
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