

**IN THE COUNTY COURT OF THE 11TH JUDICIAL CIRCUIT, IN AND FOR MIAMI
DADE COUNTY, FLORIDA
CIVIL DIVISION**

ERT 163RD STREET MALL, LLC,
Plaintiff,

VS.

CASE NO. 2013 CA 10209

NOEL ENTERPRISES, LLC, LINDA NOEL AND MERCY NOEL,
Defendant(s),

and

WE FLORIDA FINANCIAL,
Garnishee.

**ANSWER TO WRIT OF GARNISHMENT
AND DEMAND FOR PAYMENT**

COMES NOW Garnishee, We Florida Financial, by and through its undersigned attorney, and answers Plaintiff's Writ of Garnishment. Garnishee has placed a hold upon \$12,498.67 to satisfy the Writ of Garnishment. Defendant has \$12,598.67 on deposit with Garnishee; however said deposit amount has been reduced by the amount of the basic share membership, \$5.00, and a garnishment fee of \$100.00 to arrive at the said amount of hold. The amount demanded in the Writ of Garnishment is \$73,465.53. There is no other tangible personal property of Defendant in Garnishee's possession or control. Defendant's address of record with Garnishee is: 1040 SW 99th Ave. Pembroke Pines, FL 33025. Garnishee knows of no other person indebted to Defendant, nor of any other person who may have any of the property of Defendant. DEMAND FOR PAYMENT OF STATUTORY GARNISHMENT FEE Garnishee has retained the undersigned attorneys to represent its interest in this matter and is obligated to pay them reasonable attorneys' fees for their services herein. Garnishee is entitled to recover those attorneys' fees in accordance with, and it hereby demands that Plaintiff pay its undersigned attorneys the statutory \$100.00 attorneys' fee required in part payment of those attorneys' fees pursuant to, Florida Statutes § 77.28. The statutory garnishment fee of \$100.00 should be made payable to "Kudulis Reisinger and Price, L.L.C" and reference "Noel Enterprises, LLC, Linda Noel and Mercy Noel" or "3093035-9226."

/S/ Jonathan L. Kudulis

Jonathan L. Kudulis
Florida Bar No.: 39027
Kudulis Reisinger and Price, L.L.C.
Post Office Box 653
Birmingham, Alabama 35201
(205) 251-3151
garn@krpfirm.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing instrument has been furnished to all parties, as applicably, dated this 20th day of January 2023.

/S/ Jonathan L. Kudulis
Jonathan L. Kudulis

NOT AN OFFICIAL COPY - PUBLIC ACCESS - NOT AN OFFICIAL COPY - PUBLIC ACCESS