

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIRCUIT CIVIL DIVISION

RANDALL TOWNSEND, individually,
And RANDALL TOWNSEND, as
F.S.617 REPRESENTATIVE for the
FIRST BAPTIST CHURCH OF
CITRUS PARK/CITRUS PARK
CHRISTIAN SCHOOL
Plaintiffs,

Case No.2015-CA-001928

vs.

JOHN GRANT, individually, JOHN GRANT,
As Registered Agent of First Baptist Church
Of Citrus Park/Citrus Park Christian School,
JOHN GRANT, P.A., et. Al.,
Defendants

MOTION FOR DEFAULT

Plaintiff moves for entry of a default by the clerk against defendant,
Jeb Bush, individual, for failure to timely serve a paper on the undersigned
or file any paper as required by law.

Without a Notice of Appearance, David Axelman Esq. and the Legal
Secretary Elise M. Peyton did attempt as they admit a late answer pursuant
to R.O.C.P 1.090(b) as: "E-Filed #32312750, on 9/21/2015 @5:35:35 PM", a
Monday and not a legal holiday. Defendant Jeb Bush was properly served
August 31, 2015 per the Affidavits filed with this court.

Randall Townsend, Pro Se and Per F.S.617.0834
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FOR ALL PLAINTIFFS