

**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**

_____ /

PLAINTIFFS MOTION TO STRIKE

DEFENDANT JEB BUSH'S MOTION FOR EXTENSION

**COMES NOW, Plaintiff Randall Townsend, Pro Se, for all Plaintiff's
and states:**

**1. Plaintiff's by our knowledge state that not ruling Defendant Jeb
Bush in Default is prejudicial, biased, delays justice and shows more
malfeasance, and collusion by Defendants and "others" to continue and
conceal the ongoing Malicious Enterprise, Plaintiffs have proven by truthful
Matters of Facts and Matters of Law since 1987 delaying our Due Process
Rights, illegally taking our proceeds and defaming and abducting our
Rights.**

2. Plaintiff's moves for entry of a default by the clerk and an

Honorable Court against defendant, Jeb Bush, individual, for failure to timely serve a paper on the undersigned or file any paper as required by law.

3. No Notice of Appearance has been filed on behalf of Defendant, Jeb Bush or “others unknown”, David Axelman Esq. may try to defend of the actors that were supervised or aided and abetted by Jeb Bush.

4. David Axelman Esq. and the Legal Secretary Elise M. Peyton did attempt 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.

5. Their Motion For Extension cites R.O.C.P. 1.090(b) which clearly states: “for cause shown...excusable neglect...” which is not justifiable per the facts here.

6. The R.O.C.P. 1.080(b) states: “Service by delivery after 5:00 p.m. shall be deemed to have been made on the next day that is not a Saturday, Sunday, or legal holiday.”

7. This R.O.C.P. 1.090(b), while allowing the Court to use honorable discretion for justice, allows no defenses which Counsel or Defendant can claim per this rule or any rule and per the Affidavits filed with this court by the very skilled and honorable Process Server who followed the law and did as he was directed and advised by Columba Bush, the wife of Jeb Bush at the residence.

8. Mr. David Axelman admits “...Defendant Bush’s response to the Complaint would be due on this same date.” admitting a 20 day deadline.

9. Since the Motion For Extension was filed after 5:00 PM and not E-mailed to Plaintiff's via Townsend and other defendants until 5:47 PM, and attempts to misrepresent well established facts and violations of laws Jeb Bush has personally and repeatedly by Townsend been advised since 6/30/1994, on and after our Televised Town Hall Meeting at TV13 Tampa, Florida or before by "Others" and since by Townsend.

10. Defendant Jeb Bush nor a competent counsel cannot claim excusable relief per R.O.C.P. 1.540.

11. And also Plaintiffs allege through collusion and contact from other Defendant co-participants, not his wife, Columba Bush error(s), they not her advised Defendant Jeb Bush of his missed 5:00 PM filing deadline, as Jeb Bush knew of his promised and expected legal and Fiduciary Duties.

12. Plaintiff's have been delayed multiple times to try to serve Jeb Bush when his schedule showed he should be at the residence.

13. Plaintiff's also allege, as a possible "others unknown", Columba Bush, has bias and has personally and through her business ventures profited directly and indirectly using Plaintiff's proceeds and benefits unlawfully abducted by defendants and "Others Unknown" aiding and abetting in this Malicious Enterprise.

14. Is it now "Due Process" Karma, fate or justice that the wife, Columba sells out the husband Jeb, just as these defendants and "others unknown" who aid and abet and cause Karen Harrod Townsend to create

frauds about her FBCCP Superior Officer and now former husband, this Plaintiff proved to be honorable since 1987 about Facts and Laws for the protection of these Plaintiffs.

15. Additionally, facts of this case show that Florida Bar Members And “others” since July, 1988, in order to conceal their Malfeasance and continue the Malicious Enterprise have ignored Plaintiffs lawful compliance and rights and “alias” “honorable judges” “Under Color of Law” (Rom Powell, Strickland, 5th DCA, FSCt., Arnold, Holder, Barbas, Stoddard, Timmerman, Cook, 2DCA, Orfinger, Merryday, Kovachevich and others), dismissed Plaintiffs Rights and Due Process and then to benefit their Malicious Enterprise for themselves unlawfully ignored defaults by multiple Defendants in this case back to the late filing of an answer by Charles E. Lane Jr. through his counsel Charles E. Williams Jr. in the original underlying case only mailing his response July 5, 1988, when served June 15, 1988 when the summons clearly defines the time to file their answer is within 20 days and a fact raised by Townsend then and excused and allowed by all defendants to the Prejudice and damages of all Plaintiffs.

16. Plaintiff’s request the court to take judicial notice of all Matters of Facts and Exhibits and Matters of Law as filed with the courts since or before 1987, and incorporate them herein by reference to these issues involved in the Malicious Enterprise of these Defendants and “Others unknown” showing proofs of conditions precedent.

17. Plaintiffs allege Defendant Jeb Bush, has known of issues of this

case since 1987 from his days as Florida Secretary of Commerce, under the administration of Governor Bob Martinez and Publix Supermarkets Inc. at that time a very influential and fast growing Florida Company and as advised by Townsend on June 30, 1994, of their illegal bribery practices through Lane(Jr. & Sr.), Edward Crenshaw, Bruce and Linda Chapin, Lawton Chiles, The Florida Bar, The Florida Supreme Court, The 5th DCA, Judge Rom Powell and “others” as admitted by Legal Counsel to Jeb Bush, Charles Canady, David Gibbs, Ken Conner, Mark Ober, Pam Bondi, Jim Smith, and others who advised Jeb Bush in his role as head of the Republican Party of Florida.

18. Jeb Bush was and has been fully advised of the significant damages and legal issues of this Malicious Enterprise (Prosecution) case as admitted by Bruce E. Chapin on July 24, 1991, as PLAINTIFF’S EXHIBIT HEREIN #40, showing, “...Bonneau Company...sales have approached or exceeded \$1,000,000.00 per year...between the agencies set forth above.” And as this document of Plaintiff Townsend’s losses does not reflect the other listed companies nor that the “Warning” of all lawyers “Not to Do Business” and the Companies that then Townsend acquired outside the State Of Florida were then by Tort Interference with Contracts removed from Townsend and directed to Lane et al. causing more damages as strategy of the Malicious Enterprise still ongoing.

19. Facts now prove any facts or issues of law, that any new attorney

Now as David Axelman, not filing a Notice Of Appearance is advocating for Jeb Bush or “others unknown” or as an agent of the Attorney General as AAG Cridlin and others attempt to do per F.S.16.07 or F.S. 20.11 for the Office of Legal Affairs assisting in illegal acts defined per F.S.23.1231(f-i), may try to allege are estopped or will be questioned as perjury or again another violation of Rule 4.3-1, as David Gibbs and Ken Conner as Jeb Bush’s prior Legal Counsel Charles Canady has admitted to the illegal Malicious Enterprise and even his personal role admitting facts and Matters of Law in this case as Townsend detailed in TOWNSEND v. GRAY et al. Case Number 2D10-774, obtaining the Order 2011-41 of the Supreme Court of Florida signed December 21, 2010 by Chief Justice Charles T. Canady as Plaintiff’s Exhibit #37 and then more clearly in over 195 pages in Townsend’s Amicus Brief filed to give details of the Malicious Enterprise and the Fiduciary role Attorney Heather Gray was to advocate for Plaintiffs filed with the Florida Supreme Court, December 23-24, 2010, and served on various Defendants herein who try to allege “surprise”, “ignorance” and or “confusion”. All Defendants and the Court can take judicial notice of this detailed document as Plaintiff’s Exhibit 38, posted on www.Judgeoneyourself.com since 2011.

20. Also included herein as Plaintiff’s Exhibit 39, is proof of additional facts, Defendants Maliciously conspire to deny as served on these various co-participants, notified and included in Townsend et al v. Heather Gray et al Docket NO: 12-13892, 11th DCA on appeal from 8:12-CV-

1198-T-17EAS as APPELLANT'S MOTION FOR SUPPLEMENTING INITIAL BRIEF AND MOTION FOR HABEAS CORPUS served October 24, 2012, on these same various defendants exposing their Frauds and Frauds on the Courts, in this continuing case as John Grant in the face to face meeting with Townsend at Idlewild on 11/10/2012 and in his e-mail admits he received his service and alerted David Gee, Mark Ober and others to do additional threats when Townsend refused to not pursue expose of the Malicious Enterprise as stated in these years of litigation showing damages still to these Plaintiffs.

21. Defaults per Judge Gomez (Twice) and Judge Padgett, have already been removed multiple times on Heather Gray even Judge Cook allowing her to illegally represent herself and her law firm and other defendants she was to litigate against but then defended against her own clients these Plaintiffs even after Gray had accepted a plea deal to be disbarred.

22. Additionally, Judge Holder overruled for Karen Harrod Townsend, Steven Tyler Harrod, Norma Harrod and now deceased Donald Harrod their Defaults just to continue the Malicious Prosecution.

23. It is prejudicial to Plaintiffs and additional Malicious Prosecution Delay and futility to try to allow any new counsel to try to defend concessions and admissions of illegal actions including "Hate Crimes" including illegal abduction of two children since 10/1999 and "Hate Crimes" done to a Religious Society since 1994, already made by Jeb Bush's

agents, co-participants, lawyers and judges who even he appointed to their positions on the Bench (Canady, Crenshaw, and others) and as facts already proved show these co-participants willfully continue to perjure themselves with no fear of an Honorable Court or Judge holding them accountable as even Charles Canady argued that even President Nixon was not above the law then also should not a Governor be held to the same standards of laws and ethics not just abducting proceeds and papers but herein abducting Children since 1999 and Religious Society Rights since 1994, done as collusion with John Grant et al as John Grant himself confessed November 10, 2012.

WHEREFORE, Plaintiffs move for an Honorable Court:

- 1. To Strike the Motion For Extension;**
- 2. For a Default on Defendant Jeb Bush; and**
- 3. Find Defendant(s) and their Counsel in Contempt of Court for their Frauds on the Courts;**
- 4. Issue Arrest warrants for the proved criminal actions of Defendants;**
- 5. For any and all relief, costs, fees and damages including Punitive Damages as this court deems proper and not forsaking Plaintiffs rights to have all relief and punitive damages established by a jury.**

**Randall Townsend, Pro Se and Per F.S.617.0834
P.O.Box 5 or 333 S. Tamiami Trail, #5
Osprey, Florida 34229
941 350-2677
Jfyrt59@hotmail.com
Judgeoneyourself.com
FOR ALL PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of September 25, 2015, by e-filing to the Clerk of the 13th Circuit 800 East Twiggs St. Tampa, Florida 33602 and by emails as follows TVG Electronic FILING CASE NO: 292015CA001928A001HC,
Shelley.cridlin@myfloridalegal.com;
Christina.santacroce@myfloridalegal.com;
Celia.wright@myfloridalegal.com; khornbee@hcsotampa.fl.us;
olindema@hcsotampa.fl.us; FLservice@gtlaw.com;
trammelic@gtlaw.com; moodym@gtlaw.com; richardb@gtlaw.com;
lgustofik@pcsonet.com; dconnolly@pcsonet.com;
araymond@dglawyers.com; cdenny@dglawyers.com;
corourke@dglawyers.com; scruggspa@aol.com; kkharrod@gmail.com;
epeyton@mcdonaldhopkins.com; daxelman@mcdonaldhopkins.com;
Tim and Karen Jeffers 15217 W. County Line Road Odessa, Florida 33556.

SUPPORTING AFFIDAVIT

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED RANDALL C. TOWNSEND, PRESENTING IDENTIFICATION, WHO UPON BEING DULY SWORN AND CAUTIONED EXECUTED AND STATED IN HIS OWN WORDS AND TOOK AN OATH THAT THE STATEMENTS AND THE THINGS CONTAINED THEREIN ARE TRUE AND CORRECT, TO THE BEST OF HIS KNOWLEDGE, INFORMATION AND BELIEF.

WITNESS MY HAND AND OFFICIAL SEAL THIS 25th DAY OF September, 2015,

BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

Randall C. Townsend, Pro Se and Per F.S.617.0834
P.O. Box 5 or 333 S. Tamiami Trail, #5
Osprey, Florida 34229
941 350-2677
FOR ALL PLAINTIFFS
Jfyrt59@hotmail.com
www.Judgeoneforyourself.com