

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

PLAINTIFF'S OPPOSITION REPLY TO
MOTION TO DISMISS, Charles Denny IV

Dickinson & Gibbons

COMES NOW, PLAINTIFF'S RANDALL TOWNSEND, PRO SE FOR ALL
PLAINTIFFS AND UPON OUR OPINION AND BELIEFS STATES:

1. Per PROSSER, LAW OF TORTS §46 (West 4th ed 1971):

“All persons who actively participate in a tortious act, or who aid or encourage the wrongdoer in furtherance of a common plan or design to commit the tortious act, are equally liable with the wrongdoer for the act. Those who ratify and adopt the wrong doers’s act that are done for their benefit are also equally liable with the wrongdoer for the act. Traditionally, all such aiders and abettors are joined as defendants in one action and each is held liable for the entire damage.” Matthew Bender and Company, Inc. Assault and Battery 20.04

2. **Plaintiffs filed August 1, 2007 in the underlying case 02-03812
PLAINTIFF'S OBJECTION TO ORDER DISMISSING PLAINTIFFS
AMENDED COMPLAINT WITH PREJUDICE**
3. **By Judge Crenshaw recusal of herself on September 22, 2006, all her orders were Moot including her Case Management Order of March 27, 2006.**
4. **On April 5, 2007, Townsend now as proved the FBCCP Officer filed with Verified Affidavit, Motion to Disqualify Judge Barbas and Motion For Change Of Venue**
5. **Denny and Dickinson & Gibbons were fired by Townsend 2/14/2007 so his actions of his July 26, 2007, Motion To Dismiss Plaintiffs Complaint With Prejudice for Repeated Violations of a Case Management Order was illegal.**
6. **The September 11, 2007 letter of Denny searching for the Barbas Order later filed but backdated to July 3, 2007, shows more proofs of their criminal collusion in the Malicious Enterprise.**
7. **Barbas jurisdiction had been pulled to Federal**

**Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
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FOR ALL PLAINTIFFS
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of September 17, 2015, by hand or email or 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; trammellc@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; kjeffers@citruspark.org for 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 IDENTIFICATON, 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 17th DAY OF September, 2015,
BY ID PRODUCED _____
NOTARY PUBLIC: _____
Respectfully submitted,

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