

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 MOTION FOR CLARIFICATION FOR
DEFENDANT CHARLES DENNY IV, AS ALLEGED COUNSEL FOR
RON BECK, TO FILE A PROPER NOTICE OF APPEARANCE OF
WHO HE OR HIS FIRM REPRESENTS IN THIS 15CA1928 Case.

COMES NOW, RANDALL TOWNSEND, PRO SE, FOR ALL PLAINTIFFS AND
STATES:

1. It appears Mr. Denny as in this case has not filed a proper Notice Of
Appearance.

2. In the underlying case Townsend v. Ron Beck, et al., case 02-03812,
Attorney Denny never provided a Notice Of Appearance yet on January 21,
2003, page 9 line 7, of the Transcript, Mr. Denny states:

“It was complicated, Your Honor, because there are some 20
defendants, including the entire congregation of First Baptist
Church of Citrus Park. My firm represents all of the
defendants. And so we would be making the same arguments,
essentially, on behalf of the other defendants.”

3. It appears that Mr. Denny is alleging at that time since 2003, he

represented also the F.S.617, Corporation "Not For Profit", and violate F.S.817.02 taking the proceeds of Plaintiffs herein, which as now the facts prove he knew then as he was advised by Townsend before entering the chambers of Judge Arnold on January 21, 2003, he was illegally assisting in frauds and crimes and he was violating the Corporation Not For Profit then through now that this is an intentional act to do a conflict of interest as the cases at the last minute handed to the court and to Plaintiff Townsend cited even that day of January 21, 2003, cases that if one Sherardized these cases that a "Fraud on the Court" was attempted and with the intentional assistance of Judge Arnold and others till now completed and then and continues still to Mr. Denny's Motion To Dismiss as filed in this related case by continuing to try to conceal his "Fraud on the Court" and malfeasance to the "Non Sect" members and the Corporation as a F.S. 617, Corporation "Not For Profit".

WHEREFORE, Plaintiffs request that the court order:

- 1. Defendant Denny IV to properly file Notices of Appearance for this case 15CA1928 and 02-03812 and any other case as employed by or for the representation of FBCCP and that DENNY IV specifically name those he or DICKINSON & GIBBONS, represented in these cases for Ron Beck or FBCCP or related others.**
- 2. Find to the fullest extent of the laws, Mr. Denny and his co-participants in violation of the laws;**

3. ISSUE NE EXEAT FORM 1.917 WRITS on Denny IV and his co-participants;
4. Award Compensation for Plaintiffs to the fullest relief per our laws including Punitive Damages established by a jury.

Respectfully Submitted by:
Randall Townsend, Pro Se and Per F.S.617.0834
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941 350-2677
FOR ALL PLAINTIFFS
Jfyrt59@hotmail.com
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was provided this day of _____ 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; 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 ____ DAY OF _____, 2015,
BY ID PRODUCED _____

NOTARY PUBLIC: _____

Respectfully submitted,

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