

IN THE COUNTY COURT IN AND FOR
ORANGE COUNTY, FLORIDA

LVNV FUNDING LLC AS ASSIGNEE OF
ACCOUNTS MANAGEMEN

Plaintiff

CASE NO: 07-SC-15402-71

vs.

ROSEMARY KEITH

Defendant

MOTION FOR FINAL JUDGMENT OF
CONTINUING WRIT OF GARNISHMENT

and

WALMART INC.

Garnishee

COMES NOW the Plaintiff, by and through its undersigned attorneys and respectfully moves this Court for an entry of a Final Judgment of Continuing Writ of Garnishment and as grounds therefore would show this Court that:

1. On April 30, 2009, a judgment was entered against the Defendant, ROSEMARY KEITH in the sum of \$1,635.46 plus interest at the rate set forth in Section 55.03, Florida Statutes from the date of the judgment. The current amount outstanding on the Judgment is \$3,387.51, which includes post judgment cost and interest.

2. The Garnishee has filed an Answer in the above referenced cause showing that it was and will continue to be indebted to the Defendant. Accordingly, the Plaintiff is entitled to a continuing judgment as a matter of law for amounts set forth in the Continuing Writ of Garnishment, plus additional sums as they are withheld from the Defendant's wages in accordance with State and Federal law together with post judgment interest and costs.

WHEREFORE, the Plaintiff respectfully requests that this Court enter a Final Judgment of Continuing Writ of Garnishment in its favor and to award the Plaintiff the costs incurred in this garnishment action.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail to: Rosemary Keith PO BOX 585384 ORLANDO, FL 32858-5384 and WALMART INC. ATTN: PAYROLL P.O. BOX 82 Bentonville, AR 72716, on the date filed with the Florida E-filing portal.

HAYT, HAYT & LANDAU, P.L.
Attorneys for the Plaintiff
7765 SW 87th Ave, Suite 101
Miami, Florida 33173
Telephone: 305-661-6660
Facsimile: 305-412-3940
Email: garnishment@haytfla.com

BY: *Jennifer Cruz Mesa*
Dana M. Stern, Esq., FBN: 37092
Jason S. Dragutsky, Esq., FBN: 757551
Jennifer Cruz Mesa, Esq., FBN: 94459

HHL File # 1012488

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Dana M. Stern*
Jason S. Dragutsky*
Robert J. Orovitz* **
Jennifer Cruz Mesa*
Jonathan D. Stern*
Ralph Breeden, III**
Alexandria Capers **
Clayton Wright,**
Julio Perez-Bravo**

Licensed in Florida*
Licensed in Georgia **

Law Offices Of

HAYT, HAYT & LANDAU, P.L.

GALLOWAY PROFESSIONAL PARK
7765 S.W. 87TH AVENUE
SUITE 101

MIAMI, FLORIDA 33173
TELEPHONE (305) 661-6660
TOLL FREE (877) 474-0834
FACSIMILE (305) 412-3242
July 12, 2021

EMANUEL HAYT (1929- 1983)
LILLIAN R. HAYT (1928- 1963)
BERNARD D. LANDAU (1930- 2005)

ROSEMARY KEITH
PO BOX 585384
ORLANDO, FL 32858-5384

~~LVNV FUNDING LLC IS AN ASSIGNEE OF ACCOUNTS MANAGEMENT~~
Original Creditor: PROVIDIAN FINANCIAL CORP
Account Number: XXXXXXXXXXXXX5076
Customer: ROSEMARY KEITH
File Number: 1012488

Dear Rosemary Keith:

Pursuant to your request, please find enclosed documentation verifying the debt owed to LVNV
~~FUNDING LLC AS ASSIGNEE OF ACCOUNTS MANAGEMENT~~

If you have any questions or wish to discuss this matter in further detail, please feel free to contact me.

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Very truly yours,

HAYT, HAYT & LANDAU, P.L.

By: 

Dana Stern

IN THE COUNTY COURT IN AND FOR
ORANGE COUNTY, FLORIDA
CASE NO.: 07-SC-15402-71

LVNV FUNDING LLC AS ASSIGNEE OF
ACCOUNTS MANAGEMENT
Plaintiff,

vs.

ROSEMARY KEITH
Defendant(s)

and

WALMART INC.
Garnishee

FINAL JUDGMENT OF CONTINUING WRIT OF GARNISHMENT

THIS CAUSE having come to be heard on the Plaintiff's Motion for Final Judgment of Continuing Garnishment, and the Court finding the Garnishee is indebted to the Defendant it is hereby:

ORDERED AND ADJUDGED as follows:

1. That the above named Garnishee shall pay unto the above named Plaintiff the sum it has withheld from the Defendant's wages in accordance with the Continuing Writ of Garnishment since the date of service of the writ.

2. This Final Judgment of Garnishment shall act as a Continuing Writ of Garnishment to the judgment debtor's employer who shall continue to pay unto Plaintiff, that portion of Defendant's salary or wages not to exceed 25% of Defendant's disposable earnings for the workweek or the amount by which his/her disposable earnings for that week exceed 30 times the minimum wage under Section 6(a) (1) of the Fair Labor Act of 1938 (29 U.S.C. 206(a) (1), as amended, as same become due, whichever is less, until the judgment is satisfied or until otherwise provided by Court Order; Section 77.0305, Florida Statutes.

3. The total amount of the Final Judgment outstanding is \$3,387.51, which includes post judgment cost and shall continue to accrue interest in accordance with Section 55.03, Florida Statutes.

4. Garnishee shall collect up to \$5.00 (Five Dollars) against the salary or wages of the Defendant for administrative costs for the first deduction and up to \$2.00 (Two Dollars) for each deduction thereafter.

5. Garnishee shall send payments to HAYT, HAYT & LANDAU, P.L., 7765 SW 87 Avenue, Suite 101 Miami, Florida 33173.

6. Garnishee is directed to notify the court and the Plaintiff in writing upon the termination of Defendant's employment.

DONE AND ORDERED on this _____ day _____ 2021.

COUNTY COURT JUDGE

Copies Furnished to:

HAYT, HAYT & LANDAU, P.L. 7765 SW 87 Avenue, Suite 101 Miami, Florida 33173
Rosemary Keith PO BOX 585384 ORLANDO, FL 32858-5384
WALMART INC. c/o ATTN: PAYROLL P.O. BOX 82 BENTONVILLE AR 72716

HHL File # 1012488

Original Signed

AUG 17 2021

CARLYS. L. L. L. L.
County Clerk