

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF FLORIDA, ORLANDO DIVISION

GLENN HUNTER BROWN SR,

Plaintiff,

vs.

REGIONS BANK ,

Defendant.

Case No. 6:08-bk-03082-KSJ

Chapter 7

MOTION FOR FINAL JUDGMENT AND APPLICATION/MOTION FOR WRIT
(AFTER JUDGMENT)

Plaintiff, GLENN HUNTER BROWN SR., by and through his undersigned counsel, hereby moves this Honorable Court for the issuance of a Final Judgment upon which execution shall lie and an accompanying Writ of Garnishment, and as grounds therefore alleges:

1. That the Plaintiff was granted a Motion for Violation of Automatic Stay and Creditor Misconduct (Document 22) on November 7, 2008, for the sum of \$2,421.00, including actual damages to debtor and \$1,000.00 in attorney's fees to debtors attorney.
2. That the Court stated in its order (Document 30) it shall enter a Final Judgment upon which the execution shall lie if Defendant does not timely pay the full awarded damages.
3. Defendant failed to pay Plaintiff within the 30 days of the entry of the Order (Document 30) 11/07/2008.

4. That Plaintiff has reason to believe that the above Gamishee, has in its hands, possession, or control, goods, .monies, chattels or effects belonging to the defendant.
5. That the property or things sought to be garnished is not (1) wages for personal labor or services due to the head of a family residing in the State of Florida, (2) the cash surrender value of life insurance policies issued upon the lives of citizens or residents of the State of Florida, (3) disability income benefits due under any policy or contract of life, health, accident, or other insurance.

DATED this 18th day of March, 2009.

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2009 a copy of the foregoing was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.

Regions Bank
Registered Agent Name & Address
CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE FL 32301 US

Respectfully Submitted,

/s/ Richard Nazareth
RICHARD M. NAZARETH, ESQ.
FL BAR #35006
The Nazareth Law Firm, P.A.
Attorneys At Law
625 E. Colonial Drive
Orlando, Fl. 32803
Ph: (321) 319-0587
Fax: (866) 449-8042
Counsel for the Plaintiff

1 UNITED STATES BANKRUPTCY COURT
2 MIDDLE DISTRICT OF FLORIDA

3 * * * * *

4 In re: GLENN HUNTER BROWN)
5 Debtor(s).) Bankruptcy No.: 08BK3082
6) Chapter 7
7 GLENN HUNTER BROWN,)
Plaintiff,) Adversarial
8 Vs.) Proceeding:
9 REGIONS BANK,)
Defendant.)
0 _____
1 _____

2 WRIT OF EXECUTION

3 TO THE UNITED STATES MARSHAL FOR THE MIDDLE DISTRICT OF FLORIDA:

4 On _____, a judgment (Document 30) was entered in the docket
5 of the above entitled Court and action, in favor of GLENN HUNTER BROWN, as Judgment
6 Creditor, and against REGIONS BANK, as Judgment Debtor, for:

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8 \$ 1,421.00 Principal
9 \$ 1,000.00 Attorney Fees
0 \$ _____ Interest, and
1 \$ _____ costs, making a total amount of
2 \$ 2,421.00 JUDGMENT AS ENTERED

3 WHEREAS, according to an affidavit and request for issuance of write of execution
4 filed herein, it appears that further sums have accrued since the entry of judgment,
5 to writ:

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\$ 0.00 Accrued interest, and
\$ 600.00 Accrued costs and fees, making a total of
\$ 600.00 ACCRUED INTEREST, COSTS AND FEES

Credit must be given for payments and partial satisfaction in the amount of:
\$ 0,00 Which is to be first credited against the total accrued interest, costs and fees, with any excess credited against the Judgment as entered, leaving a net balance of

\$ 3021.00 ACTUALLY DUE on the date of issuance of this writ, of which
(Clerk to Complete)

\$ _____ Is due on the Judgment as entered, and bears interest at _____% per annum, in the amount of \$ _____ PER DAY, from the date of entry of the judgment to the date of issuance of this writ, to which must be added the accrued costs and fees and the commissions and cost of the officer executing this writ. (Interest rate and mount per day to be completed by attorney.)

Notice by mail of the sale under the writ of execution has or Has not been requested. The following named persons have requested such notice of sale:

NAME	ADDRESS

YOU ARE THEREFORE COMMANDED to satisfy the said Judgment with interest and cost as provided by law and your costs and disbursements out of the personal property of said debtor, except that for any period, 75 percent of the disposable earnings of the debtor during this period or for each week of the period 30 times the minimum hourly wage prescribed by section 6 (a)(1) of the Federal Fair Labor Standards Act of 1938 [29 USC 206 (a) (1)], and in effect at the time the earnings are payable, whichever is greater, is exempt from any levy of execution pursuant to this writ, and if sufficient personal property cannot be found, then out of his real property; or if the Judgment be a lien upon real property, then out of the real property belonging to such debtor, and make return of this writ within not less than ten (10) days nor more than sixty (60) days after your receipt thereof with what you have done endorsed hereon.

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U.S. Bankruptcy Court
Lee Ann Bennett, Clerk of Court

Deputy Clerk