IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CASE NO. 12012447 CI-011

TERRY GENE BOLLEA, PROFESSIONALLY KNOWN AS HULK HOGAN,

Plaintiff,

v.

GAWKER MEDIA, LLC AKA GAWKER MEDIA, NICK DENTON, A.J. DAULERIO,

Defendants,

and

JPMORGAN CHASE BANK, N.A.,

Garnishee.

ANSWER TO WRIT OF GARNISHMENT AND DEMAND FOR STATUTORY <u>PAYMENT PURSUANT TO FLA. STAT. § 77.28</u>

Garnishee, JPMORGAN CHASE BANK, N.A. ("Garnishee"), by and through undersigned counsel, hereby answers the Writ of Garnishment (the "Writ") and states as follows:

1. At the time of service of the Writ (plus sufficient time not to exceed one business day for Garnishee to act expeditiously on the Writ), at the time of this Answer, and at all times between such times, Garnishee was indebted to Defendant, Albert J. Daulerio, a/k/a "A.J. Daulerio," 1165 Cabana Road #2, Riviera Beach, FL 33404, by virtue of the following deposit account titled in the name of Defendant:

Account ending in **Example** in the amount of \$1,505.78

2. Garnishee retains the total amount of \$1,505.78 subject to the Writ pursuant to Florida Statutes § 77.19 and subject to offset for applicable administrative fees pursuant to the account agreement between Garnishee and Defendant.

3. At the time of this Answer and at the time of the service of the Writ, and at all times between those periods, Garnishee has had no other goods, money, chattels, effects, or other tangible or intangible property of Defendant in its possession or control.

4. Garnishee does not know of any other persons indebted to Defendant or who may have any of the property of Defendant in their possession or control.

5. Garnishee has been obligated to retain counsel in this matter and is required to pay its attorneys a reasonable fee, for which it is entitled to an award or fees as provided by Florida Statutes § 77.28.

6. These responses are based upon a search of data contained in JPMorgan Chase Bank, N.A.'s centralized customer identification and account information system. That system may not necessarily capture all relevant information concerning the judgment debtor or accounts.

WHEREFORE, the Garnishee demands payment to "WARGO & FRENCH, LLP" in the amount of \$100.00 pursuant to Florida Statutes § 77.28 forthwith for the part payment of its attorney fee. Payment shall be sent to 201 S. Biscayne Boulevard, Suite 1000, Miami, Florida 33131, and should include the title of the action and its corresponding case number. Garnishee further prays for the entry of an Order dissolving the Writ herein, and for such other and further relief as this Court deems just and proper.

DESIGNATION OF EMAIL ADDRESSES

Counsel for Garnishee, pursuant to Rule 2.516 of the Florida Rules of Judicial Administration, hereby designates the following primary and secondary email addresses for

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service of court documents: <u>Primary email address</u>: *wf-fl-garn@wargofrench.com*; <u>Secondary</u> <u>email address</u>: *wf-fl-garn2@wargofrench.com*.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via E-

Service this 18th day of August, 2016 upon, Kenneth G. Turkel, Esq., [kturkel@bajocuva.com].

WARGO & FRENCH, LLP

Attorneys for Garnishee 201 S. Biscayne Boulevard Suite 1000 Miami, Florida 33131 Telephone: (305) 777-6000 Facsimile: (305) 777-6001 E-mail: wf-fl-garn@wargofrench.com E-mail: wf-fl-garn2@wargofrench.com

JOSEPH D. WARGO Florida Bar No. 934194