Chipley Request for Legal Services Form (Responses)

<u>Tracking</u> Number	Timestamp	Email Address	Legal Service Requested	Summary of Request	<u>Date</u> Submitted	<u>Response</u> Deadline	<u>Contact</u> Name	Supporting Documentation for Request	<u>MBJ</u> Reviewed	Notes	Status
24-001	1/3/2024 9:08:04	tdonjuan@cityofchipley	Request for Formal Written Opinion to City Council	We spoke the other day about the new business coming in downtown that will be selling alcoholic beverages and will be having food trucks. They are wanting to apply for alcoholic beverage license 8COP this is typically the license type for a restaurant. On the application the zoning officer is required to sign off for zoning. Would there be any issues if the City approved and signed off on this establishment.	1/3/2024		Tamara Donjuan	<u>niquin</u>		Sent memo to TD	
24.022			Request for Memo to Administration/Staff (Legal	Are skateboards allowed on City sidewalks and public areas where not prohibited. Florida Statute 316.2065(9) & (11) basically indicate that Skateboarders are pedestrians and may use the sidewalk and/or crosswalk to cross the roadway. Attorney General Opinion Number: AGO 98-15, reflects same statutes and same opinion. City Ordinance: Sec. 34-87 Bicycles, etc prohibited. states: No person shall ride a bicycle, tricycle or velocipede, or other such vehicle or toy over or upon any public sidewalk within the city. Does a skateboard fall into the category of "other such vehicle or toy"?	1/18/2021	4/22/2020	Scott	https://drive.google.com/open? id=1gbl0SeH9Nsq8LP4owU3sOw3Z8gZ3 R6i	4/40/2020	Sent memo to	Complete
24-002	1/18/2024 12:52:31	ey.com director@washcomall.	Research)		1/18/2024	1/23/2024	Thompson Michael	<u>_R61</u>	1/19/2024	CST Sent resolution to	Complete
24-003	1/30/2024 10:28:48	com	Draft Document	Draft resolution for CRA budget amendment	1/30/2024	2/1/2024			1/30/2024		Complete
24-004	1/30/2024 10:29:24	director@washcomall. com	Draft Document	Draft Council resolution adopting Business Mentoring Program	1/30/2024	2/1/2024	Michael Maxwell		1/30/2024	Sent draft resolution to MM	Complete
24-005	2/20/2024 9:49:25	tdonjuan@cityofchipley .com	Document/Contract Review	I explained to the developer about a P&Z and city council approval would be needed because the property is located in our CDD. I never told him that he would have to rezone. He states that the new law that he does not have to conduct the review can you help on this and let me know if he is still required to go thru with the development procedures, we have for the CDD. I have will forward you the email. It will not attach correctly.	2/20/2024	2/29/2024	Tamara Donjuan		2/20/2024	Sent memo to TD	Complete

COC: Current Litigation

as of February 27, 2023

Attorney	Case Name	Court Judge Docket No.	Description	Outside Counsel	Parties	ng	Hold sor ? in	
Goldhagen, Matt	COC v Annie Holmes	Court: Washington Co Circuit Civil Case No. 2023-CA-07 Judge: Christopher Patterson Magistrate Judge: N/A	Foreclosure of Code	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9693	Plaintiff(s): City of Chipley Defendant(s): Annie Holmes Third Parties: N/A		N	1/13/23 - Complaint filed & Summons Issued. Waiting on USPS PO Box Request to come back with Street Address for Service of Complaint & Summons. 2/14/23 Sent Summons & Complaint to Sherrif for service upon Defendant. 4/10/23 - Waiting for ROS from Sherrif. 5/11/23-Receive Return of Non Service. 6/26/23 - Vvaiting on service by Publication due being unable to serve Annie Holmes. 7/26/23 - Proof of Publication for 7/12/23 & 7/19/23 filed Waiting for Proof of Publication for 7/26/23 & 8/2/23. 8/18/23 - Filed Notice o Filing Affidavit of Publications. 8/22/23 - Clerk's default entered. Need to file Motion to Default Judgment & schedule hearing. 9/20/23 - Filed Notice of Substitution of Counsel. 12/22/23 - File Motion for Default Judgment. 3/4/24 - Motion for Final Default Jdgmt being reviewed by MJG.
Goldhagen, Matt	COC v Jeremie & Carlie Peters et al	Court: Washington Co County Civil Case No. 2023-CC-41 Judge: Frederick Peel Magistrate Judge: N/A	Foreclosure of Code Enforcement Lien /	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9694	Plaintiff(s): City of Chipley Defendant(s): Jeremie Peters, Carlie Petres, Kathy J. Warrington n/k/a Kathy Hartzog, John E. Hartzog, & Fareoffercashnow, Inc. Third Parties: N/A		N	1/13/23 - Complaint drafted & awaiting attorney's review. 3/20/23 - Followed w/Atty re: file complaint. 4/21/23 Follow up w/Atty re filing Complaint and othe pleadings. 5/1/23 - Complaint, Notice of Lis Pendens & Notice of Appearance filed w/Court. 6/23/23 - waiting on returns of service. 7/26/23 - FairOffer served on 7/20/23 & 8/9/23 Answer due deadline calendared. Kathy & John Hartzog served of 7/26/23 & 8/15/23 Answer due deadline calendared. Retur of Non-Service filed on 7/26/23 for Carlie Peters, may reside in Destin. 8/25/2 - Still awaiting service upon Carlie Peters and Jeremie Peters. 9/20/23 - Filed Notice of Substitution of Counsel. 11/30/23 - No answers filed. 3/4/24 - need Motion for Clerk Default.
Goldhagen, Matt	COC v. Estate of Joseph R. Ledlow et al	Court: Washington Co Circuit Civil Case No. 2023-CA-59 Judge: Christopher Patterson Magistrate Judge: N/A	Foreclosure of Code Enforcement Lien / 1278 Holley Ave. & 492 2nd Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9695	Plaintiff(s): City of Chipley Defendant(s): Estate of Joseph R. Ledlow a/k/a Joseph R. Ledlow, Deceased; All Heirs, Beneficiaries, Devisees, Legatees, Spouses & Creditors of Joseph R. Ledlow a/k/a Joseph R. Ledlow, Deceased Third Parties: N/A		N	1/13/23 - Complaint drafted & awaiting attorney's review. 3/20/23 - Followed I w/Atty re: file complaint. 4/21/23 Follow up w/Atty re filing Complaint and othe pleadings. 4/28/23 - Complaint, Notice of Lis Pendens & Notice of Appearanc filed w/Court. Waiting for service by Publication. 7/26/23 - Publications scheduled for 7/26/23, 8/2/23, 8/9/23, & 8/16/23. 8/18/23 - Filed Notice of Filing Affidavit of Publications. Need to file Motion to Appoint Admin Alitem. 9/20/23 - Filed Notice of Substitution of Counsel. 11/15/23 - Received a second recorded Order. Waiting for title work. Will amend the complaint to include new lien. 12/22/23 - Appoint Ad. Litem & Amend complaint to include 492 2nd Street CE Lien. 2/23/24 - Filed Amended Complaint and Motion to Appoint AAL and received Order appointing AAL. 3/25/24 Awaiting AAL repoint
Goldhagen, Matt	COC v. Estate of Mary C. MyDosh et al.	Court: Washington Co County Civil Case No. 2023-CC-39 Judge: Frederick Peel Magistrate Judge: N/A	Foreclosure of Code Enforcement Lien / 589 Main Street & 592 Main Street	Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9697	Plaintiff(s): City of Chipley Defendant(s): Estate of Mary C. Mydosh a/k/a Mary Mydosh a/k/a Marh Carmella Davis; Charles Smejkal, Jr.; All Heirs, Beneficiaries, Devisees, Legatees, Spouses & Creditors of Mary C. Mydosh a/k/a Mary Mydosh a/k/a Marh Carmella Davis, Deceased Third Parties: N/A		N	2/9/23 - Requested Title Work. 4/24/23 - Draft Complaint, Summons, Notice Action, Notice of Lis Pendens, Affidavit of Const. Service, Notice of Appearance and emailed to JAM for review. 4/28/23 - Complaint, Notice of L Pendens & Notice of Appearance filed w/Court. Waiting on service. 6/23/23 Waiting on service by publication. 7/26/23 - Waiting on Return of Service fo Smejkal & proof of publications (publications are scheduled for 7/26/23, 8/2/ 8/9/23, & 8/16/23, 8/18/23 - Filed Notice of Filing Affidavit of Publications. Need to file Motion for Clerk's Default & Appoint Admin Alitem. 9/20/23 - File Notice of Substitution of Counsel. 11/30/23 - In process of getting admin ad litem/attorney ad litem appointed. 12/22/23 - Drop Count I of Complaint & Appoint Ad. Litem. 1/3/24 - Received Order Appointing AAL - Kristi Novonglosky. Waiting to receive AAL report.
Goldhagen, Matt	COC v. Nancy Elizabeth White	Court: Washington Co. Case No. N/A Judge: N/A Magistrate Judge: N/A	Foreclosure of Code Enforcement Lien / 737 Sinclair St.	Mart Gordnagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com	Plaintiff(s): City of Chipley Defendant(s): Nancy Elizabeth White Third Parties: N/A		N	2/24/23 - Need to bring motion back to magistrate to enter an amended order that identifies both parcels (correct scriviners error). 3/20/23 - Tax deed sale scheduled. COC filed claim for surplus funds. 12/22/23 - Interpleader suit file
Goldhagen, Matt	COC v. Estate of Dennie Gilmore a/k/a Dennie Gilmore, Deceased et al	Court: Washington Co Circuit Civil Case No. 2023-CA-47 Judge: Christopher Patterson Magistrate Judge: N/A	Foreclosure of Code Enforcement Lien /	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9699	Plaintin(S): City of Crippey Defendant(S): Estate of Dennie Gilmore a/k/a Dennie Gilmore, Deceased; All Heirs, Beneficiaries, Devisees, Legatees, Spouses & Creditors of Dennie Gilmore a/k/a Dennie Gilmore, Deceased Third Portios: N/A		N	1/13/23 - Complaint drafted & awaiting attorney's review. 3/20/23 - Followed w/Atty re: file complaint. 4/10/23 Notarized Aff. Const. Service. File Complair Summons, NOA & NOLis Pendens. Notice of Action in Foreclosure publication is currently running and will be complete on 5/10/23. Answer to complaint du May 19. 6/23/23 - Drafting motion to appoint administrator ad litem for estate 9/20/23 - Filed Notice of Substitution of Counsel. 11/30/23 - In process of getting admin ad litem/attorney ad litem appointed. 1/3/24 - File Motion to Appoint AAL. 1/5/24 - Received Order Appointing AAL - Kristi Novonglosky. Waiting to receive AAL report.

COC: Current Litigation

as of February 27, 2023

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Goldhagen, Matt	COC v. Estate of Martha Pippin	Court: Washington Co. Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 777 West Boulevard & 499 Martin Luther King Drive	Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9700	Plaintiff(s): City of Chipley Defendant(s): Estate of Martha D. Deal Pippin; Michael Brian Tyalor; Amanda Taylor Third Parties: N/A		Y	5/17/23 - Possible Homestead property. 3/4/24 - Review title work.
Goldhagen, Matt	COC v. Richard Barrentine	Court: Washington Co. Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 1219 Johnson Avenue	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9701	Plaintiff(s): City of Chipley Defendant(s): Richard Barrentine and Diana Barrentine Third Parties:		у	4/28/23 - Waiting for recorded lien. 8/28/23 - received title work. 9/8/23 - Title work shows mortgage foreclosure suit filed. Researching whether junior lien foreclosure or intervene in existing foreclosure suit to claim surplus funds. 12/22/23 - Moratorium until May.
Goldhagen, Matt	COC v. Sandra Brewer	Court: Washington Co. Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 746 West Blvd.	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90	Plaintiff(s): City of Chipley Defendant(s): Sandra Brewer and Iplusive Expressions, LLC Third Parties:		N	4/12/23 - Lien recorded. 8/25/23 - Waiting for title work. 3/4/24 - Receive title work & need to draft Complaint.
Goldhagen, Matt	COC v. Stephanie Broxton	Court: Washington Co Circuit Civil Case No. 2023-CA-86 Judge: Christopher Patterson Magistrate Judge: N/A	Appeal of Code Enforcement Lien / 653 Bennett Drive	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90	Plaintiff(s): City of Chipley Defendant(s): Stephanie Broxton Third Parties:		N	6/22/23 - Order finding Violation. 30 day waiting period for appeal. Broxton filed appeal 31 days after Order. COC filed Motion to Dismiss. 8/22/23 - Judge denied Motion to Dismiss. 10/26/23 - Order dismissing appeal due to Appellant's failure to file the required brief. 12/22/23 - Waiting on direction from Council - CRA grant received.
Goldhagen, Matt	COC v. Joshua Deans	Court: Washington Co. Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 745 763 1st Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9707	Plaintiff(s): City of Chipley Defendant(s): Joshua Deans and Jeremy Deans Third Parties:		И	6/22/23 - Order finding Violation. 30 day waiting period for appeal. 9/25/23 - Waiting for title work.
Goldhagen, Matt	COC v. Latonia Mckinnie	Court: Washington Co. Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 1167 6th Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (650) 638-9708	Plaintiff(s): City of Chipley Defendant(s): Latonia Mckinnie Third Parties:		N	6/22/23 - Order finding Violation. 30 day waiting period for appeal. 11/15/23 - Received recorded Order. Waiting for title work. 12/22/23 - Follow up w/TD re: magistrate.
Goldhagen, Matt	Lora Bell v. COC	Court: Washington Co Circuit Civil Case No. 2023-CA-77 Judge: Christopher Patterson Magistrate Judge: N/A	Interpleader Complaint / 737 Sinclair Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9709	Plaintiff(s): Hon. Lora Bell, Clerk of Court Defendant(s): City of Chipley, Nancy E. White, Amy K. Hill, William M. Hill, Andrew H. Hill, Tina M. Hill, Monica N. Hill, Christina Hill, and Teannah Hill Third Parties: N/A	John Y. Roberts , Esq. FL Bar No. 049687 1 2879 Madiso n Street P.O. Box 1544 Mariana , FL 322477 (850) 526- 3865	N	7/18/23 COC served with Complaint. Answer filed 8/9/23. 9/20/23 - Filed Notice of Substitution of Counsel. 11/17/23 - Clerk filed motion for interpleader Hearing hasn't been scheduled due to all parties not being personally served. 1/23/24 Hrg on Bell's Motion for Judgment of Interpleader scheduled for 1/30/24. 2/26/24 - Hearing on Motion for Interpleader heard on 1/30/24 & Order granting Motion was entered on 1/31/24. 3/16/24 Regions filed motion for final order & schedule hrg for 6/3/24. 3/18/24 - MJG drafting MSJ.
Goldhagen, Matt	CPD v. Nipul Metha	Court: Washington Co Circuit Civil Case No. 2023-CA-85 Judge: Christopher Patterson Magistrate Judge: N/A	Forfeiture	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9710	Plaintiff(s): Chipley Police Department Defendant(s): Nipul Metha, Atul Modi, and Nitya, Inc. d/b/a Gas Mart/77 Gas Mart	.1865	N	8/4/23 - Petition for Final Order of Forfeiture filed with the Court. 8/9/23 - Atul Modi and Gas Mart served with Petition & Summons. 8/25/23 - Serve Nipul Metha. 1/29/24 File Motion for Prob. Cause. 2/23/24 Metha served. Modi filed statement w/Court.

COC: Current Litigation

as of February 27, 2023

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Goldhagen, Matt		Court: Washington Co Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 5871 7th Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): City of Chipley Defendant(s): [DEFENDANT] Third Parties: [THIRD PARTIES]		z	12/22/23 - Special Magistrate to amend order to correct address.
Goldhagen, Matt	COC v. Terry Davis	Court: Washington Co Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 504 MLK Drive	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): City of Chipley Defendant(s): Terry Davis Third Parties: [THIRD PARTIES]		Ν	3/4/25 Rcv title work & draft complaint.
Goldhagen, Matt	COC v. Edith Juanita Hogan	Court: Washington Co Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 737 Pecan Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): City of Chipley Defendant(s): Edith Juanita Hogan, Third Parties: [THIRD PARTIES]		z	3/4/24 MBJ to follow-up with TD.
Goldhagen, Matt	COC v. Thelma Wood	Court: Washington Co Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 771 Pecan Street	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): City of Chipley Defendant(s): Thelma Wood Third Parties: [THIRD PARTIES]		Y	3/4/24 Title Work ordered. 3/14/24 Hold - per TD owner is trying to comply.
Goldhagen, Matt	COC v. Pamela Moore et. al.	Court: Washington Co Case No. Judge: Magistrate Judge:	Foreclosure of Code Enforcement Lien / 869 Chesnut Hill	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): City of Chipley Defendant(s): Pamela Moore, David A. Marshall Third Parties: [THIRD PARTIES]		Ν	3/4/24 Title Work ordered.
Goldhagen, Matt	Chipley Course, LLC v. COC	Court: Washington Co Circuit Civil Case No. 2023-CA-123 Judge: Timothy Register Magistrate Judge: N/A	Breach of Contract - Dec. Judgment	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): Chipley Course, LLC Defendant(s): City of Chipley Third Parties: N/A	Mitch Dever, Esq. FL Bar No. 093973 0 PO Box	N	12/22/23 - Prepare Complaint re: dec. relief. 1/25/24 Receive Amended Complaint from Chipley Gulf Course. Draft Answer to Amended Complaint and Counterclaim for Declaratory Relief. 2/7/24 COC filed an Answer and Counterclaim. 3/19/24 Responded to CGC's discovery request. Send discovery to CGC. Depo of P. Tanner scheduled for 4/23/24.
Goldhagen, Matt	Godfrey Environmental	Court: Washington Co Case No. Judge: Magistrate Judge:	Godfrey Environmental	Matt Goldhagen Blankenship Jordan P.A. 1512 Highway 90 Chipley, FL 32428 matt@blankenshipjordanpa. com (850) 638-9689	Plaintiff(s): [PLAINTIFF] Defendant(s): [DEFENDANT] Third Parties: [THIRD PARTIES]		N	12/22/23 - Monitor. Dismissed w/o prejudice