

MARIE FLORENCE BEAUBIEN-CORDON

IN THE COUNTY COURT, IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

Plaintiff,

CIVIL DIVISION

v.

CASE NO. _____

LERICHE AND ASSOCIATES, LLC
And ALL OTHERS IN POSSESSION

Defendant(s).

COMPLAINT FOR REMOVAL OF NON-RESIDENTIAL TENANT

COMES NOW MARIE FLORENCE BEAUBIEN-CORDON, hereinafter the Plaintiff, and sues **LERICHE AND ASSOCIATES, LLC** and All Others in Possession, hereinafter Defendant(s), and alleges:

1. That this is an action for removal of Tenants from real property in Miami-Dade County, Florida, as authorized by Florida Statutes §83.20(2).

2. Plaintiff is the Owner and Defendant(s) is the Tenant in possession of the following described real property in said County:

685 N.E. 126 Street
North Miami, Florida 33161

3. Defendant(s) occupy said premises from month to month pursuant to an oral agreement at \$1,850.00 per month plus tax due on the 13th day of each month.

4. Defendant(s) has failed to pay the rent and taxes due on April 13, 2022 and May 13, 2022. The total amount of rent due at this time is \$3,947.90.

5. The three (3) days notice in writing requiring the payment of such rent or the possession of the premises has been duly served but Defendant(s) refuses to do either. The term of the Notice has expired and the Defendant(s) continues in possession of the premises without permission of Plaintiff. A copy of the said Notice showing the date of service thereof, the amount of the rent due as of the date of service, the rental rate, and the time each payment is due is attached to this Complaint marked Plaintiff's "Exhibit A," and is hereby made a part hereof.

6. All conditions precedent have been performed or have occurred.

7. Plaintiff was required to retain the undersigned law firm to prosecute this action on her behalf and has obligated herself to pay reasonable attorney's fees. Plaintiff is entitled to an award of attorney's fees and court costs pursuant to §83.251 and §57.105 of the Florida Statutes.

8. Plaintiff is entitled to the Summary Procedure provided for in Chapter 51 of the Florida Statutes.

WHEREFORE, Plaintiff demands Judgment for possession of the property pursuant to Florida Statute §83.20(2); costs, and reasonable attorney's fees pursuant to Florida Statutes §83.251 and §57.105, and for such other relief as the court deems just and proper.

S/ MARLIE CORDON, ESQUIRE

FLORIDA BAR NO.: 977550

CORDON LAW OFFICES

335 Northwest 54th Street

Miami, Florida 33127

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Marlie Cordon, Esquire

May 16, 2022

Ms. Naomi Leriche
Registered Agent for
LERICHE & ASSOCIATES, LLC
And ALL OTHERS IN POSSESSION
685 N.E. 126TH STREET
NORTH MIAMI, FLORIDA 33161

*Coowner
Ninethera Turenne
5/20/22 @ 10:52AM
146 #2080*

RE: THREE (3) DAY NOTICE TO PAY RENT OR DELIVER POSSESSION.
685 N.E. 126TH STREET, NORTH MIAMI, FLORIDA 33161

Ms. Leriche:

You are hereby advised that the above-named law firm has been retained by Ms. Florence Beaubien-Cordon to represent her interest in the above-and-herein addressed property.

You occupy the above referenced premises from month to month pursuant to an oral agreement, at \$1,850.00 per month plus tax, due on the 13th day of each month. You failed to pay the rent due from April 13, 2022 and May 13, 2022. Thus, pursuant to F.S. §83.20, this Notice to Pay Rent or Deliver Possession is herewith given you.

You are hereby notified that you are indebted to my client in the sum \$3,947.90 for the unpaid rent and use of the premises at 685 N.E. 126TH STREET, MIAMI, FLORIDA 33161.

On behalf of my client, I DEMAND PAYMENT OF THE RENT at Cordon Law Offices, 335 N.W. 54 Street, Miami, Florida 33127, OR POSSESSION OF THE PREMISES WITHIN THREE (3) DAYS (excluding Saturday, Sunday, and legal holidays) from the date of the receipt of this Notice to Pay Rent or Deliver Possession. To wit, on or before 5/25, 2022.

GOVERN YOURSELF ACCORDINGLY!



Marlie Cordon, Esquire

I hereby certify that the foregoing THREE (3) DAY NOTICE was hand delivered to the above addressee (), posted on the front door at the above address because the addressee was not home () on this 20 day of May, 2022.

Kenny Gallego #2080

EXHIBIT A