

**IN THE COUNTY COURT
15TH JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA**

AMERICAN EXPRESS NATIONAL BANK
Plaintiff,

vs.

YIFENG ZHANG
Defendant.

CITIBANK
Garnishee.

CASE NO.: 50-2023-CA-015964-XXXXA-MB
DIVISION:

FIRST NOTICE TO DEFENDANT

I HEREBY CERTIFY that a copy of the Writ of Garnishment, Motion for Writ of Garnishment and Notice to Defendant of Right Against Garnishment of Wages, Money and Other Property (Defendant is an individual) are included with this Certificate and have been served on the Defendant by U.S. Mail and/or email to Yifeng Zhang at 1400 Sailboat Circle, Wellington, FL, 33414 day 5 of March, 2026.

/s/ Joshua James Knurr

Lisa DiSalle, Esquire

Florida Bar No.: 186236

Joshua James Knurr, Esquire

Florida Bar No.: 1016695

Staff Attorneys for the Plaintiff

American Express National Bank

9550 Regency Square Blvd.

Suite 410

Jacksonville, FL 32225

877-305-0433

Primary Email: flpleadings@aexp.com

Secondary Service Email:

Lisa.DiSalle@aexp.com;

Joshua.J.Knurr@aexp.com

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MOTION FOR WRIT OF GARNISHMENT
(AFTER JUDGMENT)

Plaintiff moves the Court to issue a Writ of Garnishment against the above named Garnishee and as grounds therefore alleges that the Plaintiff obtained a judgment against the above named defendant for the sum of \$55,595.00 less payment and/or adjustment in the amount of \$2,929.12 the above referenced case on April 11, 2024, and that there still remains due and unpaid on said judgment the sum of \$53,145.69 . The Plaintiff does not believe that the defendant has in possession visible property upon which a levy can be made sufficient to satisfy the said judgment. The Plaintiff has reason to believe that the above named garnishee has in said garnishee's hands, possession or control goods, monies, chattels, or effects belonging to the defendant, and move the Court that a writ of garnishment may issue against.

The Plaintiff further moves the Court to award to the Plaintiff the costs incurred in this garnishment action.

/s/ Joshua James Knurr

Joshua James Knurr, Esquire
Florida Bar No.: 1016695
American Express Legal
Staff Attorney for the Plaintiff
9550 Regency Square Blvd.
Suite 410
Jacksonville, FL 32225
877-305-0433
Service Email: Joshua.J.Knurr@aexp.com

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WRIT OF GARNISHMENT

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to summon the garnishee, CITIBANK 10086 JOG RD, BOYNTON BEACH, FL 33437 to serve an answer to this writ on American Express Legal, plaintiff's attorney, whose address is 9550 Regency Square Blvd., Suite 501, Jacksonville, FL 32225, within 20 days after service on the garnishee, exclusive of the day of service, and to file the original with the clerk of this court either before service on the attorney or immediately thereafter, stating whether the garnishee is indebted to defendant, Yifeng Zhang at the time of the answer or was indebted at the time of service of the writ, or at any time between such times, and in what sum and what tangible and intangible personal property of the defendant the garnishee is in possession or control of at the time of the answer or had at the time of service of this writ, or at any time between such times, and whether the garnishee knows of any other person indebted to the defendant or who may be in possession or control of any of the property of the defendant. The amount set in plaintiff's motion is \$53,145.69.

DATED on 02/26/2026, 2026.

Mike Caruso
As Clerk of the Court

By — *Michelle Essop* —
As Deputy Clerk



NOTICE TO DEFENDANT OF RIGHT AGAINST GARNISHMENT OF WAGES, MONEY AND OTHER PROPERTY

The Writ of Garnishment delivered to you with this Notice means that wages, money and other property belonging to you have been garnished to pay a court judgment against you. **HOWEVER, YOU MAY BE ABLE TO KEEP OR RECOVER YOUR WAGES, MONEY OR PROPERTY. READ THIS NOTICE CAREFULLY.**

State and federal laws provide that certain wages, money, and property, even if deposited in a bank, savings and loan, or credit union, may not be taken to pay certain types of court judgments. Such wages, money, and property are exempt from garnishment. The major exemptions are listed below on the form for Claim of Exemption and Request for Hearing. This list does not include all possible exemptions. **YOU SHOULD CONSULT A LAWYER FOR SPECIFIC ADVICE.**

TO KEEP YOUR WAGES, MONEY AND OTHER PROPERTY FROM BEING GARNISHED, OR TO GET BACK ANYTHING ALREADY TAKEN, YOU MUST COMPLETE A FORM FOR CLAIM OF EXEMPTION AND REQUEST FOR HEARING AS SET FORTH BELOW AND HAVE THE FORM NOTARIZED. YOU MUST FILE THE FORM WITH THE CLERK'S OFFICE WITHIN 20 DAYS AFTER THE DATE YOU RECEIVE THIS NOTICE OR YOU MAY LOSE IMPORTANT RIGHTS. YOU MUST ALSO MAIL OR DELIVER A COPY OF THIS FORM TO THE PLAINTIFF AND THE GARNISHEE AT THE ADDRESSES LISTED ON THE WRIT OF GARNISHMENT.

If you request a hearing, it will be held as soon as possible after your request is received by the court. The plaintiff must file any objection within **8** business days, if you hand delivered to the plaintiff a copy of the form for Claim of Exemption and Request for Hearing, or in alternatively, **14** business days if you mailed a copy of the form for claim and request to the plaintiff. If the plaintiff files an objection to your Claim for Exemption and Request For Hearing, the clerk will notify you and the other parties of the time and date of the hearing. You may attend the hearing with or without an attorney. If the plaintiff fails to file an objection, no hearing is required, the writ of garnishment will be dissolved and your wages, money or property will be released.

YOU SHOULD FILE THE FORM FOR CLAIM OF EXEMPTION IMMEDIATELY TO KEEP YOUR WAGES, MONEY OR PROPERTY FROM BEING APPLIED TO THE COURT JUDGMENT. THE CLERK CANNOT GIVE YOU LEGAL ADVICE. IF YOU NEED LEGAL ASSISTANCE, YOU SHOULD SEE A LAWYER. IF YOU CAN'T AFFORD A PRIVATE LAWYER, LEGAL SERVICES MAY BE AVAILABLE. CONTACT YOUR LOCAL BAR ASSOCIATION OR ASK THE CLERK'S OFFICE ABOUT ANY LEGAL SERVICES PROGRAM IN YOUR AREA.

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_____ /

CLAIM OF EXEMPTION AND REQUEST FOR HEARING

I claim exemptions from garnishment under the following categories as checked:

- _____ 1. Head of family wages. (You must check a or b below.)
- _____ a. I provide more than one-half of the support for a child or other dependent and have net earnings of \$750.00 or less per week.
- _____ b. I provide more than one-half of the support for a child or other dependent, have net earnings of more than \$750.00 per week, but have not agreed in writing to have my wages garnished.
- _____ 2. Social Security benefits
- _____ 3. Supplemental Security Income benefits
- _____ 4. Public Assistance (welfare).
- _____ 5. Workers' Compensation.
- _____ 6. Unemployment Compensation.
- _____ 7. Veterans' benefits.
- _____ 8. Retirement or profit-sharing benefits or pension money.
- _____ 9. Life insurance benefits or cash surrender value of a life insurance policy or proceeds of annuity contract.
- _____ 10. Disability income benefits.
- _____ 11. Prepaid College Trust Fund or Medical Savings Account.
- _____ 12. Other exemptions as provided by law. (Explain)

I request a hearing to decide the validity of my claim. Notice of the hearing should be given to me at:

Address: _____

Telephone: _____

The statements made in this request are true to the best of my knowledge and belief.

Defendant's Signature

Date

STATE OF FLORIDA
COUNTY OF PALM BEACH

Sworn and subscribed to before me this _____ day of _____, 20____
by _____ who is personally known to me or who has
produced _____ as identification and who did [] did not []
take an oath.

MIKE CARUSO
CLERK OF CIRCUIT COURT

Deputy Clerk

Notary Public

CERTIFICATE OF SERVICE

I certify that a copy of the attached document has been furnished to the plaintiff or the plaintiff's attorney:

Plaintiff or Plaintiff's Attorney

Address

City, State, and Zip Code

by _____ hand delivery or _____ mail
(check one)

this _____ day of _____, 20_____.

Signature of person filing document

Address

City, State, and Zip Code

Telephone number

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Defendants.

FINAL JUDGMENT AFTER DEFAULT OF STIPULATION

Based upon stipulation by the parties and an affidavit reflecting the default on the stipulation by the Defendant and the outstanding indebtedness, it is

ORDERED AND ADJUDGED that plaintiff, AMERICAN EXPRESS NATIONAL BANK 115 W. Towne Ridge Parkway, Sandy, Utah 84070, recover from defendant, Yifeng Zhang, residing at 1400 Sailboat Circle, Wellington, Florida 33414 (), the sum of \$55,129.00 on principal, with costs in the sum of \$466.00, making a total of \$55,595 for which let execution issue.

PLAINTIFF SHALL SERVE A COPY OF THIS FINAL JUDGMENT ON DEFENDANT WITHIN 5 DAYS BY U.S. MAIL AND FILE A CERTIFICATE OF SERVICE. A CERTIFICATE OF SERVICE IS REQUIRED BEFORE A MOTION TO COMPEL OR WRIT OF GARNISHMENT WILL BE ENTERTAINED BY THE COURT

DONE AND ORDERED at West Palm Beach, Palm Beach, Florida.

50-2023-CA-015964-XXXX-MB 04/11/2024

James Sherman Judge
ADMINISTRATIVE OFFICE OF THE COURT

50-2023-CA-015964-XXXX-MB 04/11/2024
James Sherman
Judge

JUDGE

Copies to:

Lisa DiSalle, Esquire
Joshua James Knurr, Esquire
Staff Attorneys for Plaintiff
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Jacksonville, FL 32225
877- 305-0433
flpleadings@aexp.com
Lisa.DiSalle@aexp.com
Joshua.J.Knurr@aexp.com

NOT A CERTIFIED COPY