

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

**AMERICAN EXPRESS NATIONAL BANK
Plaintiff,**

vs.

**CASE NO.: 50-2023-CA-015964-XXXX-MB
DIVISION:**

**YIFENG ZHANG
Defendant.**

**CITIBANK
Garnishee.**

**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

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