

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

AMERICAN EXPRESS NATIONAL BANK

Plaintiff,

MB

vs.

YIFENG ZHANG,
Defendants.

CASE NO.: 50-2023-CA-015964-XXXA-

DIVISION:

**MOTION AND AFFIDAVIT FOR
FINAL JUDGMENT AFTER DEFAULT OF STIPULATION**

Plaintiff, AMERICAN EXPRESS NATIONAL BANK, by and through the undersigned attorney, moves this Court for entry of a Final Judgment After Default of Stipulation against the Defendants, and would state as follows:

Lisa DiSalle, Esq., an attorney duly admitted to practice law in the Courts of the State of Florida, affirms under penalty of perjury:

1. I am an attorney with American Express, the plaintiff in the above-entitled action. I am fully familiar with the facts and circumstances of this matter, and submit this motion and affidavit in support of a Final Judgment after default of Stipulation of Settlement.
2. The above stipulation of settlement commenced by agreement entered into on January 17, 2024.
3. The terms of the Stipulation were as follows: Defendant(s) agrees to pay Plaintiff the settlement sum of \$55,233.12 on account number [REDACTED]. A one-time payment of \$55,233.12 is to be made by January 22, 2024.
4. On January 22, 2024, Yifeng Zhang (Zhang) defaulted by not making the payment due on January 22, 2024, and all subsequent payments.
5. That on February 5, 2024 the Plaintiff sent a letter to the Defendant notifying him/her of the Default and providing a ten (10) day period to cure the Default.
6. That the Defendant has not cured the Default within the ten (10) day period provided.

¹ On April 1, 2018 American Express Centurion Bank changed its name to American Express National Bank and American Express Bank FSB, merged with American Express National Bank with American Express National Bank as the surviving entity after the merger. See <https://www.occ.treas.gov/topics/licensing/interpretations-and-actions/2018/interpretations-and-actions-jan-2018.html>. See also, 12 U.S.C. § 35; 12 CFR 5.24 and 12 U.S.C. § 1828 et seq.

7. Defendant, Zhang has paid pursuant to the stipulation of settlement the sum of \$133.12.

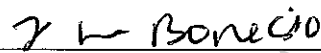
8. That after giving credit for payments, the following amounts are due \$55,129.00 principal and \$400.00 (filing fee) + \$11 (summons) + \$55 (service) Costs.

WHEREFORE, Plaintiff respectfully request this Honorable Court to enter Final Judgment in the amount of \$55,129.00 principal and \$400.00 (filing fee) + \$11 (summons) + \$55 (service) Costs.



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Sworn to and subscribed before me
this 13 day of March, 2024.


Notary Public
My Commission Expires:



Affiant Personally Known by Me