

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA, IN AND FOR PALM BEACH COUNTY
CIVIL DIVISION**

AMERICAN EXPRESS NATIONAL BANK,

Plaintiff,

vs.

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

YIFENG ZHANG,

Defendant(s),

and

TRUIST BANK,

Garnishee.

**ANSWER OF GARNISHEE AND DEMAND TO JUDGMENT CREDITOR FOR
PAYMENT OF STATUTORY GARNISHMENT FEE**

Garnishee, Truist Bank (“Garnishee”), by its undersigned attorneys, answers the Writ of Garnishment served on June 17, 2024 (the “Writ”), with respect to Defendant(s), Yifeng Zhang (*Garnishee’s Reference No. 261327*), as follows:

1. At the time of this Answer and at the time of the service of the writ, plus one business day to allow Garnishee sufficient time to act expeditiously on the writ, and at all times between those periods, Garnishee was not and is not indebted to Defendant for any sum of money.

2. At the time of this Answer and at the time of the service of the writ, plus one business day to allow Garnishee sufficient time to act expeditiously on the writ, and at all times between those periods, Garnishee did not have and does not have any goods, money, chattels, effects or other tangible or intangible property of Defendant(s) in its possession or control.

3. Garnishee does not know of any other person who may be indebted to or who has possession or control of any tangible or intangible personal property of Defendant(s).

DEMAND FOR PAYMENT OF STATUTORY GARNISHMENT FEE

Garnishee has retained the undersigned attorneys to represent its interest in this matter and is obligated to pay them reasonable attorneys' fees for their services herein. Garnishee is entitled to recover those attorneys' fees in accordance with, and it hereby demands that Plaintiff pay its undersigned attorneys the statutory \$100.00 attorneys' fee required in part payment of those attorneys' fees pursuant to, Florida Statutes § 77.28. **The statutory garnishment fee of \$100.00 should be made payable to "Burr & Forman LLP" and reference Yifeng Zhang or 261327.**

DESIGNATION OF EMAIL ADDRESSES

Counsel for Garnishee, pursuant to Rule 2.516 of the Florida Rules of Judicial Administration, hereby designates the following primary and secondary email addresses for service of court documents: Primary email address: TB.FL.Garnishment@burr.com; Secondary email address: clane@burr.com.

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2024, I electronically filed the foregoing with the Clerk of the Circuit Court in Palm Beach County, Florida, by using the Florida Courts E-Filing Portal system, which will send a notice of electronic filing to AMERICAN EXPRESS LEGAL, Joshua James Knurr, Esq., Joshua.J.Knurr@aexp.com, 9550 Regency Square Blvd., Suite 501, Jacksonville, FL 32225, Attorney for Plaintiff.

/s/W. Patrick Ayers

W. Patrick Ayers, Esq.
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Attorneys' for Garnishee, Truist Bank