

IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CASE NO. 25-76070-CC-05
CIVIL DIVISION

TWJ 1101, LLC dba Panorama Tower,

Plaintiff,

vs.

Yifeng Zhang

Defendant(s).

PLAINTIFF'S MOTION FOR DEFAULT BY THE COURT

Plaintiff, by and through undersigned counsel, moves for entry of a default by the Court against Defendant(s), Yifeng Zhang, for failure to serve or file written defenses on the undersigned as required by law and failure to deposit any money into the court registry as required by Fla. Stat. § 83.60(2).

I DO HEREBY CERTIFY that no copy of an answer or other pleading of the Defendants in the above styled cause has been served upon the Plaintiff or its attorney prior to the time of filing this Motion for Default by the Court. Further, a diligent search has not produced a valid social security number or date of birth. Without the aforesaid information a report from the Department of Defense Manpower Data Center confirming the military status of the defendant(s) cannot be obtained.

I HEREBY CERTIFY a true and correct copy hereof was served upon Yifeng Zhang, at 1100 BRICKELL BAY DR APT 85A , MIAMI, FL 33131 by US First Class Mail on this 28 day of May, 2025.

Respectfully submitted,

s/ Elizabeth S. Rivera, Esq. _____
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