

IN THE COUNTY COURT OF THE THIRTEENTH JUDICIAL CIRCUIT,
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

PAY YOUR MORTGAGE, LLC,

Plaintiff,

Case No. 22-CA-

v.

UNI TRUSTEE SERVICES, LLC, as Trustee of the
611 Valencia Park Drive Land Trust,

Defendant.

COMPLAINT

Plaintiff, PAY YOUR MORTGAGE, LLC (“Plaintiff”), by and through its undersigned counsel, sues Defendant, UNI TRUSTEE SERVICES, LLC, as Trustee of the 611 Valencia Park Drive Land Trust (“Defendant”), and would show:

1. All conditions precedent to the filing of this action have been satisfied.
2. Venue is proper in Hillsborough County, Florida, as the subject property is located here and the cause of action accrued here.
3. This is an action to foreclose an equitable lien in an amount in excess of \$15,000 but less than 30,000, exclusive of interest, attorney’s fees, and costs.
4. On or about December 5, 2021, Defendant purchased the following property in Hillsborough County, Florida (“the Property”):

Lot 34, Block 2, Oak Glen, according to Map or Plat thereof as recorded in Plat Book 79, Page 26 of the Public Records of Hillsborough County, Florida
More commonly known as: 611 Valencia Park Dr, Seffner, FL 34584

Defendant has been the owner of the Property since that time.
5. The acquisition cost of the Property and initial fix-up expenses totaled \$16,900. At the time, the parties agreed that Defendant would repay that amount upon acquisition.

6. Defendant failed to repay this money as agreed.

7. Equity regards Defendant's actions as wrongful. After all, without the money of Plaintiff's predecessor in interest, Defendant never would have been able to procure title to the Property, retain title, or rent it out in the manner that it did.

8. In light hereof, this Court should impose an equitable lien on the Property in Plaintiff's favor in the amount of \$16,900, plus interest and costs of collection. If Plaintiff does not pay that sum by a specified date, this Court should schedule the Property for public auction on the first available date.

WHEREFORE Plaintiff demands that this Court take jurisdiction of this cause and the parties hereto; impose an equitable lien in Plaintiff's favor on the Property, declare that lien is superior to Defendant's interest in the Property, and determine the amounts due to Plaintiff under the terms of thereof (to include the lien amount, costs, and interest). Plaintiff further demands that this Court set a date by which these sums are to be paid and schedule a foreclosure sale if those amounts are not paid by that date.

January 5, 2022

/s/ Jake C. Blanchard

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