

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, STATE OF FLORIDA  
CIVIL DIVISION

MARCO MORANTE,

Plaintiff,

v.

CASE NO: 2024-015118-CA-01

ERIKA GIRALDI aka ERIKA JAYNE LAIA  
RIBATALIADA and MICHAEL MINDEN,

Defendants.

/

**MOTION TO RECONSIDER THE AMENDED ORDER STRIKING DEFENDANTS'  
COMBINED MOTION TO DISMISS MARCO MORANTE'S COMPLAINT FOR LACK  
OF PERSONAL JURISDICTION**

Defendants, ERIKA GIRALDI aka ERIKA JAYNE LAIA RIBATALIADA and MICHAEL MINDEN, by and through the undersigned counsel, hereby move this Honorable Court to reconsider its Order on March 21<sup>st</sup> striking Defendants' Combined Motion to Dismiss on the following grounds:

1. Defendants, all residents of California, were sued by Marco Morante in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida in a complaint filed on August 9, 2024.
2. The complaint has four counts. It is premised on conduct and alleged damages which accrued sometime between 2016 and 2021.
3. The undersigned was informed of the complaint and undertook representation of the defendants sometime in the first week of October.

4. On October 3<sup>rd</sup>, I received a call from Bruce Bealke and Jenna Garmon. We discussed timing for a response on behalf of the defendants. I was asked and agreed to accept service for one of the defendants.
5. The telephone call was followed by an email from Bealke and Garmon saying they were agreeable to an extension of time to respond to the complaint for all three defendants to November 4, 2024.
6. Their email did mention that one defendant was not yet served. They said that Bealke and an attorney, Eric Garmon would be in Tampa in the “next few weeks”. The email said that they wanted to meet me in person to “discuss possible ways to resolve this dispute”. The email is attached as **Exhibit 1**.
7. The next two weeks were disastrous due to Hurricane Helen. I spoke with Bealke next on October 22, 2024. He followed that call with an email on the morning of October 23, 2024. He was concerned that I was filing a motion to dismiss for lack of personal jurisdiction. His tone and words changed to argumentative and insulting. The email is attached as **Exhibit 2**.
8. Attached to the complaint in this matter are numerous exhibits filed in a US District Court Case in the Central District where the same core allegations have been made in a Federal Court case based on the same facts raised in the complaint here. The Plaintiff in that case is a client of Bealke and a business partner with Morante. The defendants in the California case include the three defendants in this matter. The California case includes an additional five defendants: American Express Company and Secret Service Defendants Robert Savage, Steve Scarince and Kenneth Henderson. That case is on appeal of an order

denying an anti-slap motion entered by the US District Court Judge. The matter is pending in the 9<sup>th</sup> US Circuit Court of Appeals. All discovery is stayed in that case.

9. Bealke continued to call me and discuss making a “deal” until November 18th. That day I realized the Florida action was filed to further the California case. The plaintiff doesn’t even bother to establish anything actionable occurring beyond the 2016-2017 timeframe that would give rise to a cause of action in Florida. The demand that I assist him in such an abuse of the Florida court system is beyond the pale.
10. As the middle of November approached, I began to get more and more pressure to agree to file an answer and waive any jurisdictional motions or any other motion that would prevent Bealke and Garmon from beginning to take discovery of the witnesses and parties in the California case. Bealke offered to not seek any discovery from my clients and to also not go to the press with what he said was unfavorable information about Ms. Girardi for 6 months. By the 18<sup>th</sup> of November, I was convinced that Mr. Bealke and his client were just wanting to use this Court and the Florida judicial system to get around the stay in California. I informed Bealke and Garmon I would not be a party to such conduct. I told them I would defend my clients as I saw fit. **(See Exhibit 3)**
11. On December 2, 2024, I filed the Combined Motion to Dismiss For Lack of Personal Jurisdiction. That same day and for several days thereafter I tried to work with Bealke and Garmon to schedule the combined motion to dismiss. My legal assistant spoke with the Court’s judicial assistant and was told that a hearing from 90 minutes up to 3 hours would likely require time on non-jury trial calendar. I looked up the form for special setting in this Court’s online information and offered to work with Ms. Garmon to stipulate to a joint motion for a special setting. I even suggested scheduling a case management conference

and asking the Court for guidance. I did tell them I has a December trial and a February trial. The December trial was for 3 days. The February was for six days with 3 days of pretrial hearings. The Friday before the February trial I was served with a Motion for Case Management Conference that include email exhibits which were incomplete and misleading as was the text of the motion itself. I was in trial prep and then over a week long trial which ended on Monday evening the 17<sup>th</sup> (actually a holiday). **(See Exhibit 4)**

12. I did not hear from Bealke nor Garmon until March 10, 2025. Garmon included me on an email message with the Court's judicial assistant. Garmon had been communicating with judicial assistant to schedule a hearing on Morante's Motion for Case Management Conference. I did not even notice the email until that evening. At 5:30PM, however, I did see an email from Bealke telling me there was 9:00AM hearing on the Motion for Case Management Conference. It was aggressive stating that Bealke suggest in the "strongest terms" that I attend the hearing. Being aware there was a hearing I was able to move some other matters and be present via ZOOM. For the Court's information, I have been a sole practioner since February. I am winding down my practice for personal reasons. That process is very stressful and overwhelming often. I have been associating new counsel or referring out cases for 3 months. It is extremely time consuming. When the Court called our case, I pointed out that no notice of hearing had been filed, nor had I received proper notice. The Court said that nothing would be heard at that time and that the Court was setting a CMC on its own. **(see Exhibit 5)**

13. I heard the Court make that statement. Because of mistakes at my office, my calendar was not updated when my staff received the notice of hearing. I did not realize the hearing was set for the morning of the 20<sup>th</sup>. That was not a willful nor intentional act. I am sincerely

sorry that I did not appear for the hearing. That is my fault and my responsibility. It was not anything that my clients did. But for the complete failure to notice the hearing on the 11<sup>th</sup>, the hearing on the 20<sup>th</sup> would not have been ordered. The emails with the Court's judicial assistant in scheduling did not include me until a clerk from Garmon's office emailed whether the hearing on the 11<sup>th</sup> would be via Zoom. When the judicial assistant responded with an affirmative answer, Garmon replied with a thank you. I was courtesy copied on that March 10, 2025, 1:20pm email. Again, I cannot express how embarrassed I am and how much regret I have for missing that hearing. Plaintiff brought in a third attorney to cover that hearing. I had been communicating with Mr. Stearns from the 15<sup>th</sup> to the 17<sup>th</sup> after he contacted me to see if we could come to some agreement. Mr. Stearns knew I was aware of the hearing and had discussed the issues with him. He emailed me after the hearing and informed me that the Court had entered an order striking the Combined Motion to Dismiss. Actually he emailed me 3 times and we spoke on the phone. He knew that the CMC was set by the Court because of the failure to file or serve a Notice of Hearing for the prior hearing. I doubt he informed the Court nor reminded the Court of his client's co-counsel willful concealing the time of the scheduling of the hearing on March 11<sup>th</sup>. Mr. Stearns would not tell me what was said by him but he pointed out that the Court wanted the order to include the Court's willingness to entertain a motion for default. **(see Exhibit 6)**

14. The failure to attend the hearing was my fault. It was not the fault of any of my three clients. Any sanction or consequence should be mine. And the plaintiff's conduct in the entirety of the context of the case is so egregious at the least, that neither the plaintiff, his counsel, nor his business partner should benefit from my mistake.

Wherefore, Defendants pray that this Court vacate the Order Dismissing The Combined Motion To Dismiss and for such other relief as the Court sees fit.

**CERTIFICATE OF SERVICE:**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed and provided to the parties with the Florida Court's E-Filing Portal this 10th day of April 10, 2025.

/s/ James L. Wilkes, II

James L. Wilkes, II, Esq.  
Florida Bar No. 0405337  
WILKES & ASSOCIATES, P.A.  
3550 Buschwood Park Drive, Suite 230  
Tampa, Florida 33618  
Telephone: (813) 873-0026  
Facsimile: (813) 286-8820  
[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)  
[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)  
[FL@yourcasematters.com](mailto:FL@yourcasematters.com)  
*Attorney for the Defendants*

# Exhibit 1

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Sunday, October 6, 2024 8:26 PM  
**To:** james-wilkesmchugh <[james@yourcasematters.com](mailto:james@yourcasematters.com)>  
**Cc:** Eric Garmon <[eric@garmon-bealke.com](mailto:eric@garmon-bealke.com)>; [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)  
**Subject:** Fw: Extension to file responsive Pleading

Jim:

Good evening I see that there is another hurricane bearing down on your neck of the woods. God willing you and your staff will remain safe.

I just wanted to reconfirm our agreement as outlined below.

Please let me know by return email as soon as possible.

All the best,

Bruce Bealke

310-562-6856

----- Forwarded message -----

From: BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
Date: On Fri, Oct 4, 2024 at 8:48 AM  
Subject: Fw: Extension to file responsive Pleading  
To: [james@yourcasematters.com](mailto:james@yourcasematters.com) <[james@yourcasematters.com](mailto:james@yourcasematters.com)>  
Cc: [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com) <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>, Eric Garmon <[eric@garmon-bealke.com](mailto:eric@garmon-bealke.com)>

Jim:

On behalf of Jenna and Eric we really appreciated our time with you yesterday on the phone.

As we discussed, we are agreeable to extending your time for responsive pleadings from 30 days from yesterday up to and including November 3, 2024.

You also agreed that you will accept service on behalf of Laia Ribatallada.

Sometime in the next few weeks, Eric and I will be in the Tampa Bay area and would like to meet with you in person to discuss possible ways to resolve this dispute.

If you need to reach me, I include my personal mobile below. Feel free to text me.

Keep up the great work for the elderly, they need you.

All the best,



Bruce Bernard Bealke

Attorney At Law  
Illinois State Bar No. 6200543  
77 W Wacker Dr.  
Suite 45001  
Chicago IL 60601

mobile 310 562 6856

# Exhibit 2

## Evelyn Y. Cisneros

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**From:** Jim Wilkes  
**Sent:** Thursday, November 14, 2024 5:52 PM  
**To:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Subject:** RE: Morante v Girardi et al

Bruce, you are correct. When you told me about the FL Supreme Court case on defamation you sent me, I couldn't find it so I had asked Robert about it and he knew the case. I just now am putting together that your emails were not reaching me. Evan sent me a copy of the complaint. What time do you want to talk?

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Thursday, November 14, 2024 4:01 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Fw: Morante v Girardi et al

I suspect you never got this...

Sent from [Proton Mail](#) for iOS

----- Forwarded message -----

From: BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
Date: On Wed, Oct 23, 2024 at 9:01 AM  
Subject: Fw: Morante v Girardi et al  
To: [james@yourcasematters.com](mailto:james@yourcasematters.com) <[james@yourcasematters.com](mailto:james@yourcasematters.com)>  
Cc: [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com) <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>, Eric Garmon <[eric@garmon-bealke.com](mailto:eric@garmon-bealke.com)>

Jim:

I hope that you have had some good fortune to avoid most of the problems with the recent hurricanes in the Tampa Bay area.

When we last spoke, we had agreed to a 30 day extension for you to file a responsive pleading. We also discussed about coming in person to Tampa to discuss possible resolution.

This morning I looked at my notes from our phone call, and I was struck by the fact that you said you were planning to possibly file a motion to dismiss based on personal jurisdiction.

I would direct your attention to Florida's long arm statute as it pertains to this case:

“48.193 Acts subjecting person to jurisdiction of courts of state.—

(1)(a) A person, whether or not a citizen or resident of this state, who personally or through an agent does any of the acts enumerated in this subsection thereby submits himself or herself and, if he or she is a natural person, his or her personal representative to the jurisdiction of the courts of this state for any cause of action arising from any of the following acts:

1. Operating, conducting, engaging in, or carrying on a business or business venture in this state or having an office or agency in this state.”

You had mentioned you thought there was no jurisdiction based on your assertion that “the tort occurred outside the state of Florida”

As you can see above, there is no requirement that a tort occur in the state of Florida if the person has been “operating, conducting, engaging in or carrying on a business or business venture in the state.”

Attached are two exhibits from the Los Angeles case. They show unequivocally that your client was engaging in and carrying on an entertainment business/business venture in both Miami-Dade and Orlando.

Indictment count 4  
TRANSACTION #84

Date: 4/14/2016

Amount: \$9156

Invoice # 5 - 1206

\*Erika Girardi and Marco Marco worked together for nearly 4 years  
brought up any issue with billing

\*American Express statements reveal hotel and travel purchases co

\*Corresponding texts with Laia Ribatella confirm client's knowled

\*American Express made NO effort at time of transaction or after

**\*American Express refunded Erika Jayne \$78**

**ERIKA JAYNE**  
— LIVE —  
SATURDAY **MAY 14TH**  
HOSTED BY:  
**MARCO MARCO**  
STAR OF  
**Bravo**  
**Real Housewives**  
**House 2**  
1915 NW MIAMI CT | MIAMI, FL | FOR TABLE RESERVATIONS 305-521-9056  
TICKETS: [WANTICKETS.COM/ERIKAJAYNE](http://WANTICKETS.COM/ERIKAJAYNE)

**WE**  
**W**  
**B**  
SOUTH FLORIDA  
QUEEN  
JUDGE  
SATURDAY  
1915 NW MIAMI  
[WWW.WA](http://WWW.WA)







Indictment count 5  
TRANSACTION #96

Date: 5/23/2016

Amount: \$9256.37

Invoice #

\*Erika Girardi and Marco Marco worked together for nearly 4 years  
brought up any issue with billing

\*American Express statements reveal hotel and travel purchases co

\*Corresponding texts with Laia Ribatella confirm client's knowled

**\*American Express made NO effort at time of transaction or after**

**\*American Express refunded Erika Jayne \$78**



theprettytymess • Follow

Parliament House Orlando



theprettytymess Last night in

346w



Amazing wo

340w Reply



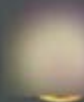
#BRITNEYSPEARS

341w Reply



Liked by kevinmylrea22 and 1

JUNE 4, 2016



Follow

I think it is rather obvious that filing a motion based on lack of personal jurisdiction given the Florida long arm statute regarding carrying on a business venture is not only a loser, it is likely frivolous.

Please call me to discuss.

All the best,

Bruce Bealke

310 562 6856



# Exhibit 3

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**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Thursday, November 14, 2024 11:09 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** I'm sorry to end our phone call abruptly

As much as I admire you as a practitioner, I am not really interested in what you think of the lawsuit.

If you want to try bounce it out on a motion go right ahead. Such a motion is would be frivolous.

Your clients clearly come under the Long arm statue.

Your clients clearly have not only defamed Marco. They have also torturously interfered with his business.

I have tried very hard to be cooperative with you.

I will defend my client vigorously without delay.

As I said, I will keep that deal open till tomorrow, but you have to file tomorrow and agree to the terms that I laid out. If you do that, I will honor my word.

I'll be honest. I'm a little surprised. you told me you were going to do this: you were going to answer you were going to make it easy for me.

You have had a month and you now tell me you have not read it. You tell me Evan sent it you.

I realize you're just trying to guard her. I get it.

Please enter your appearance tomorrow or I will be forced to file for a default judgment against your clients next week.

Many people believe you are a fact witness if that turns out to be true, I will make a motion to disqualify you.

Best of luck in your trial. None of this is personal, sir. I understand what you're trying to do.

# Exhibit 4



502 Harmon Ave  
Panama City, FL  
32401  
t. 850-238-3201  
f. 850-252-1015  
Jenna@GarmonLawPC.com  
www.GarmonLawPC.com



**February 7, 2025**

*Submitted via electronic filing*  
Honorable Daryl E. Trawick  
Circuit Court Judge  
Dade County Courthouse  
73 West Flagler St., Miami, FL 33130

**Re: Marco Morante v. Erika Girardi et al**  
**Miami-Dade County Case No.: 2024-015118-CA-01**

Dear Judge Trawick,

I am writing to respectfully request that the Court set a case management conference in the above-referenced matter. Opposing counsel has filed a motion to dismiss but has made no effort to schedule a hearing for the motion despite numerous attempts from my office to coordinate. Please see attached emails. This lack of action is causing undue delays in the prosecution of this case, which is prejudicial to my client.

To ensure the timely progression of this matter, I also request that the Court issue a scheduling order. A scheduling order would provide clear deadlines and facilitate the efficient resolution of this case.

Thank you for your attention to this matter. Please let me know if any additional information or documentation is required to assist in setting the case management conference or issuing the scheduling order.

Sincerely,

Jenna Garmon, Esq.  
**THE GARMON LAW FIRM, PLLC**

Enclosures: Emails  
CC: Jim Wilkes, Esq.  
Clients



Jenna Garmon <jenna@garmonlawpc.com>

---

**SERVICE OF COURT DOCUMENT CASE NUMBER 132024CA01511801GE01 Marco Morante vs Erika Girardi et al**

---

Jenna Garmon <jenna@garmonlawpc.com>

Sun, Nov 24, 2024 at 9:52 AM

To: "jimw@yourcasematters.com" <jimw@yourcasematters.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, jlwstaff@yourcasematters.com

Mr. Wilkes,

Your motion references exhibits, but they are not filed. Can you please provide copies of these exhibits?

Thank you,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

----- Forwarded message -----

From: <[eservice@myflcourtaccess.com](mailto:eservice@myflcourtaccess.com)>

Date: Fri, Nov 22, 2024 at 4:18 PM

[Quoted text hidden]

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

Jenna Garmon <jenna@garmonlawpc.com>

Mon, Dec 2, 2024 at 3:46 PM

To: jimw@yourcasematters.com

Cc: BealkeLaw <BealkeLaw@protonmail.com>, jlwestaff@yourcasematters.com

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

--

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)



Jenna Garmon <jenna@garmonlawpc.com>

---

## SECOND ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

Jenna Garmon <jenna@garmonlawpc.com>

Mon, Dec 9, 2024 at 10:16 AM

To: jimw@yourcasematters.com

Cc: BealkeLaw <BealkeLaw@protonmail.com>, jlwestaff@yourcasematters.com, Chris Taylor <chris@garmonlawpc.com>

Dear Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. You will recall as a measure of our good faith, we granted you a thirty day extension to file a responsive pleading, which turned into two months. If no response is received from you or your staff in a timely manner, I will pursue court intervention including costs and fees for your dilatory tactics and conduct.

Kind regards,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Dec 2, 2024 at 3:46 PM Jenna Garmon <jenna@garmonlawpc.com> wrote:

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

--

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
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Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)







Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jim Wilkes** <jimw@yourcasematters.com>

Fri, Dec 13, 2024 at 1:37 PM

To: Jenna Garmon <jenna@garmonlawpc.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, TPA JLW Staff <JLWStaff@yourcasematters.com>

Ms. Garmon, Your email today stated it was your third attempt to set the hearing. I have not received a second attempt per my outlook email. As I am sure you know, you can take the initiative and set a motion for hearing after clearing the dates with opposing counsel. If you provide me with the available dates, I will respond with my availability. By the way, there isn't just one motion. These motions will require at least an hour for argument. I have not received any response to the motions. Do you intend to file anything? My scheduling assistant will look at dates of availability. I do see that we will require a special setting. Do you want to appear telephonically? I have limited availability over the next 2 months because of trials in January and February. Nevertheless, I will try to be available if we can get the time from the court. Please stop threatening me and telling me how little regard you have for the motions I have filed to date. And send me your "second attempt" email.

Jim Wilkes

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

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## THIRD AND FINAL ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

Jenna Garmon <jenna@garmonlawpc.com>

Fri, Dec 13, 2024 at 1:07 PM

To: jimw@yourcasematters.com

Cc: BealkeLaw <BealkeLaw@protonmail.com>, jlwstaff@yourcasematters.com, Chris Taylor <chris@garmonlawpc.com>

Bcc: Thomas UTTERBACK <tomback47@yahoo.com>, Marco Morante <marco@marcomarco.net>, Chris Psaila <chris@marcomarco.net>

Mr. Wilkes,

This shall be our third and final attempt to coordinate the scheduling of your motion to dismiss. We all know your motion is without merit and your delay in scheduling, or even responding to a single one of my emails, just furthers my point.

Again, please coordinate with me to set your motion for a hearing pursuant to the administrative orders in Miami-Dade County. I will seek sanctions, costs, and fees. Schedule your motion or withdraw it. You are delaying the inevitable.

Thank you,

--

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Dec 9, 2024 at 10:16 AM Jenna Garmon <jenna@garmonlawpc.com> wrote:

Dear Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. You will recall as a measure of our good faith, we granted you a thirty day extension to file a responsive pleading, which turned into two months. If no response is received from you or your staff in a timely manner, I will pursue court intervention including costs and fees for your dilatory tactics and conduct.

Kind regards,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401

Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Dec 2, 2024 at 3:46 PM Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

--

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

--

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
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502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)



Jenna Garmon <jenna@garmonlawpc.com>

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Jenna Garmon <jenna@garmonlawpc.com>

Mon, Dec 16, 2024 at 3:45 PM

To: Jim Wilkes <jimw@yourcasematters.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, TPA JLW Staff <JLWStaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Mr. Wilkes,

Special sets are only given for 15 minutes at a time. Judge Trawick's motion calendar has the following dates and times available: January 21, 23, 28, and 30 from 9 a.m. until 10:30 a.m. February 4, 6, 11, 13 9 a.m. to 10:30 a.m. Below is a screenshot.

21 9AM - 10:30AM Motion Calendar January 21, 2025 Available	22 9AM - 10AM Foreclosure Calendar January 22, 2025 Available	23 9AM - 10:30AM Motion Calendar January 23, 2025 Available
28 9AM - 10:30AM Motion Calendar January 28, 2025 Available	29 9AM - 10AM Foreclosure Calendar January 29, 2025 Available	30 9AM - 10:30AM Motion Calendar January 30, 2025 Available
4 9AM - 10:30AM Motion Calendar February 4, 2025 Available	5 9AM - 10AM Foreclosure Calendar February 5, 2025 Available	6 9AM - 10:30AM Motion Calendar February 6, 2025 Available
11 9AM - 10:30AM Motion Calendar February 11, 2025 Available	12 9AM - 10AM Foreclosure Calendar February 12, 2025 Available	13 9AM - 10:30AM Motion Calendar February 13, 2025 Available

Do any of these days work for you?

To what other motions are you referring? I do not mind helping you schedule, however, as you are the movant, the rules imply that you are to schedule it as well as upload supporting documents through courtMAP. **Please have your staff register you at this address so we can schedule: <https://cmap.jud11.flcourts.org/ebench/register.jsp>**

Yes, we will be filing a response, however, the local rules give us until seven days prior to the scheduled hearing.

With regard to your statement that I have little regard for your motion; in fact, quite the opposite. Your motion was well written. I respect and acknowledge your strong advocacy for victims of nursing homes. But here, we have a difference of legal opinion, and your motion, despite its persuasive tone, is simply misguided.

Please consider this my final good faith attempt to schedule. I have provided you with a link to the scheduling platform above. There are also video tutorials here: <https://www.jud11.flcourts.org/Programs-and-Services/Online-Services/courtmap>

Per your request, I will forward you attempt number 2 and attempt number 3.

I look forward to hearing from you soon.

Thank you,  
Jenna Garmon, Esq.

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jim Wilkes** <jimw@yourcasematters.com>

Tue, Dec 17, 2024 at 12:48 AM

To: Jenna Garmon <jenna@garmonlawpc.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, TPA JLW Staff <JLWStaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Jenna., these are 3 Motion to Dimiss over lack of personal jurisdiction. I assume you will file a robust response, accordingly my experience tells me that we will likely need 90 minutes to do all 3 motions. Each are unique so each must be argued separately. Do you want to consider a stipulation and jointly ask for a special set hearing?

On Dec 16, 2024, at 4:45 PM, Jenna Garmon <jenna@garmonlawpc.com> wrote:

Mr. Wilkes,

Special sets are only given for 15 minutes at a time. Judge Trawick's motion calendar has the following dates and times available: January 21, 23, 28, and 30 from 9 a.m. until 10:30 a.m. February 4, 6, 11, 13 9 a.m. to 10:30 a.m.

Below is a screenshot.

[Quoted text hidden]

[Quoted text hidden]



image.png  
59K



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jenna Garmon** <jenna@garmonlawpc.com>

Tue, Dec 17, 2024 at 7:08 AM

To: Jim Wilkes <jimw@yourcasematters.com>

Cc: TPA JLW Staff <jlwstaff@yourcasematters.com>, BealkeLaw <BealkeLaw@protonmail.com>, Chris Taylor <chris@garmonlawpc.com>

Jim,

Thanks for getting back to me. By special set, are you asking for all three motions to be heard back to back at 90 minutes each? Essentially asking for a half day before the court? Thank you for the clarification.

Jenna

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jim Wilkes** <jimw@yourcasematters.com>  
To: Jenna Garmon <jenna@garmonlawpc.com>

Tue, Dec 17, 2024 at 1:37 PM

90 mins total

On Dec 17, 2024, at 7:09 AM, Jenna Garmon <jenna@garmonlawpc.com> wrote:

[Quoted text hidden]





Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jenna Garmon** <jenna@garmonlawpc.com>

Tue, Dec 17, 2024 at 2:01 PM

To: Jim Wilkes <jimw@yourcasematters.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, TPA JLW Staff <jlwstaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Which date of the ones I sent you work?

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
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Panama City, Florida 32401  
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Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## Schedule for Depositions

2 messages

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**Jenna Garmon** <jenna@garmonlawpc.com>

Thu, Dec 26, 2024 at 10:20 AM

To: Jim Wilkes <jimw@yourcasematters.com>

Cc: Bruce Bealke <bbealke@gmail.com>, TPA JLW Staff <jlwstaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Mr. Wilkes,

I am reaching out to coordinate with you for depositions. I propose the following. Please confirm your availability:

1. Davis Rahal on January 15, 2025 (Las Vegas)
2. Nick Geurtz on January 22, 2025 (Miami)
3. Erika Girardi on January 29, 2025 (Manhattan)

All of those days are Wednesdays, and my understanding is that Ms. Girardi will not have any performances for "Chicago" on Wednesdays. The depositions will be in person, but we have no objection if you would like to attend via Zoom.

I look forward to hearing from you at your earliest convenience.

--

Jenna Garmon, Esq.  
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---

**Jim Wilkes** <jimw@yourcasematters.com>

Thu, Dec 26, 2024 at 4:20 PM

To: Jenna Garmon <jenna@garmonlawpc.com>

We cannot participate in any activity while personal jurisdiction is pending. I have local counsel in Miami trying to find a date to hear the motions. I am in trial from February 10th through the 21st. Are you available in March?

On Dec 26, 2024, at 11:20 AM, Jenna Garmon <jenna@garmonlawpc.com> wrote:

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jim Wilkes** <jimw@yourcasematters.com>

Wed, Dec 18, 2024 at 5:33 PM

To: BealkeLaw <BealkeLaw@protonmail.com>

Cc: "jenna@garmonlawpc.com" <jenna@garmonlawpc.com>, TPA JLW Staff <JLWStaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Counsel, I told you I have a 2 week trial commencing on February 10 that has been set in the 6th Circuit. I can try to clear dates for Feb 3-5 if the court has availability. My read of the court rules leads me to believe a special setting will be necessary.

Do you want to send an email to the JA asking for clarification of how the court will entertain argument? A motion over personal jurisdiction requires the court to make a ruling on mixed questions of law and fact. Your complaint appears deficient on its face. I am assume you intend to present some fact based arguments which I don't see in the court file.

The complaint fails to specify requisite facts defining which acts occurred including date, time and location that gives rise to jurisdiction in Florida over any of my 3 clients. Let me know if get dates from the court. If you do, I will try to accommodate you

Jim

On Dec 18, 2024, at 4:59 PM, BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

---

## FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

---

**Jenna Garmon** <jenna@garmonlawpc.com>

Wed, Dec 18, 2024 at 5:50 PM

To: Jim Wilkes <jimw@yourcasematters.com>

Cc: BealkeLaw <BealkeLaw@protonmail.com>, TPA JLW Staff <JLWStaff@yourcasematters.com>, Chris Taylor <chris@garmonlawpc.com>

Mr. Wilkes,

Again, please have your staff sign you up on courtMAP. I provided you instructions and a link. That is the way to schedule hearings. Also a special set is not going to be accommodated as it's only available in 5 minute increments.

You also sent me an email around 1 am the other morning asking to confer with me. Having me email the JA to set your motion and then telling me it's deficient on its face is not conferring.

Set your motion. I am not scheduling it for you. My efforts to assist are clearly not appreciated.

Jenna Garmon, Esq.  
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Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

[Quoted text hidden]



Jenna Garmon <jenna@garmonlawpc.com>

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## Hearing

1 message

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**Jim Wilkes** <jimw@yourcasematters.com>

Sat, Jan 11, 2025 at 5:35 PM

To: Jenna Garmon <jenna@garmonlawpc.com>

Jenna, did you ever go online and look at hearing times. You wrote earlier that we had to schedule the hearing; implying that you couldn't seek dates and coordinate the hearing yourself. I am incredibly busy with hearings and 2 two week trials scheduled for February alone. My suggestion is that you look at dates on the court calendar for a 90 minute hearing. I am in trial starting February 7 with the trial court calendar call for the February 10th 2 week trial docket. From the 7th through the 23rd I have no availability at this time. The new Rules of Civil Procedure are causing courts to schedule case management conferences almost randomly. The system will likely be overloaded by summer. (Justice Labarga wrote in dissent that Florida judges don't have the resources available like are available at the federal level to handle cases under the newly adopted federal procedural standards).

Let me know what dates and times you find so we can agree to setting the hearing on personal jurisdiction.

Also, we can't do anything in the case until personal jurisdiction is ruled upon.

Thank you,  
Jim Wilkes

# Exhibit 5

---

**From:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Sent:** Monday, November 18, 2024 4:48:09 AM

**To:** Laia Ribatallada <[laia@erikajayne.com](mailto:laia@erikajayne.com)>; [mm@mikeyminden.com](mailto:mm@mikeyminden.com) <[mm@mikeyminden.com](mailto:mm@mikeyminden.com)>

**Subject:** FW: Morante v Girardi et al

I want to see your pro hac motion, please. Also, there is no way Mikey and Laia meet the standard for personal jurisdiction. See *Estes v Rodin* 259 So 3<sup>rd</sup> 183 (3<sup>rd</sup> DCA). I do not think Erika met that standard. All of your evidence is linked to the 2016,2017 facts alleged in California. None of that is relevant. There is no way you have alleged facts within the last two years to even support any claims against them. Your irrelevant exhibits are a smoke screen. Mr. Morante appears to be using the Florida courts to do and end run around the California case. Florida's interest in this case is clearly so attenuated, you never even contemplated bringing those claims here. If you read the case law, you will see that Florida has a lot of legal prohibitions against recasting defamation claims. And you leave out the intervening statements made about Erika by your clients and others which show that any statements she made around the time of the LA Times story were justified as responses to the clear attempt to destroy not only her career to implicate her as a criminal with the malicious intent to see her prosecuted. You even implied that in your call to me where you said that if she doesn't comply with your demands, she will be having to take the Fifth. Bruce, that is not ethical in Florida. Your emails clearly show that we have not made any agreement yet on anything except my agreement to accept service on Laia. I have not received any service from you or Ms. Garmon for Laia, to date. I suggest you stop threatening sanctions where you have not even come to an agreement with me.

Before we go further, however, I want to explore your right to practice law in Florida. You are a member of a Florida firm, Garman-Bealke, LLC., with an attorney named Eric Garmon. Yet you are using a different name for your firm, or it appears. My concerns may be something you can explain. In the meantime, I think we should take a step back. I want to have a call with Ms. Garmon today or at least sometime this week to address the issues I have raised as well as many other points you have brought up. If you default my clients when you have lulled me into thinking I was still negotiating with

you, I will assure you that such conduct will not be well received. I also have become concerned with your latest demands about named individuals who you want to depose now. The witnesses are parties to an action where Morante is not a party. Now, you have disclosed that you intend to use the Florida case as a subterfuge to avoid California law. I will not participate in interfering with the case at the 9<sup>th</sup> Circuit nor at the US District Court. What was originally suggested was you wanted to do discovery directed towards nonparties in the California case. Your last email has exceeded anything I can conceive of entertaining. I need to discuss with Ms. Garmon to clarify her position. What you are proposing in your last messages and email reek of forum shopping and perhaps, contempt of court. It is time for you to stop speaking until I can sort all the hysteria and belligerence coming from you. If Ms. Garmon will not work with me to resolve this, I have already contacted a firm in Miami about bringing all of this to the Court's attention. Obviously, I am okay with you participating in a call with Ms. Garmon.

And maybe you can clear up all that you have said to convince me this isn't just a sham. If this is serious litigation, I have to look at filing counter claims against Mr. Morante. Under Florida law, compulsory counterclaims are to be filed in the same matter. I know what you have told me about how strong you think Mr. Morante's case is against my clients. I think you are woefully mistaken. I think Morante may well be more exposed than anyone as it currently looks. Take a step back, think of all you have said in the last weeks and maybe you will understand my point. I told you to stop threatening me. You cannot help yourself. My advice is to drop this now. If you can't, take a breath and clearly tell me your exact terms for an agreement with my clients. Mikey and Laia will not be a part of this. That I am not going to negotiate. And I am not going to do anything until I speak with your Florida counsel and work out exactly your role in a Florida firm that appears active according to the Secretary of State.

Jim Wilkes

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Thursday, November 14, 2024 4:01 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Fw: Morante v Girardi et al

I suspect you never got this...

Sent from [Proton Mail](#) for iOS

----- Forwarded message -----

From: BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>



Date: On Wed, Oct 23, 2024 at 9:01 AM

Subject: Fw: Morante v Girardi et al

To: [james@yourcasematters.com](mailto:james@yourcasematters.com) <[james@yourcasematters.com](mailto:james@yourcasematters.com)>

Cc: [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com) <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>, Eric Garmon <[eric@garmon-bealke.com](mailto:eric@garmon-bealke.com)>

Jim:

I hope that you have had some good fortune to avoid most of the problems with the recent hurricanes in the Tampa Bay area.

When we last spoke, we had agreed to a 30 day extension for you to file a responsive pleading. We also discussed about coming in person to Tampa to discuss possible resolution.

This morning I looked at my notes from our phone call, and I was struck by the fact that you said you were planning to possibly file a motion to dismiss based on personal jurisdiction.

I would direct your attention to Florida's long arm statute as it pertains to this case:

“48.193 Acts subjecting person to jurisdiction of courts of state.—

(1)(a) A person, whether or not a citizen or resident of this state, who personally or through an agent does any of the acts enumerated in this subsection thereby submits himself or herself and, if he or she is a natural person, his or her personal representative to the jurisdiction of the courts of this state for any cause of action arising from any of the following acts:

1. Operating, conducting, engaging in, or carrying on a business or business venture in this state or having an office or agency in this state.”

You had mentioned you thought there was no jurisdiction based on your assertion that “the tort occurred outside the state of Florida”

As you can see above, there is no requirement that a tort occur in the state of Florida if the person has been “operating, conducting, engaging in or carrying on a business or business venture in the state.”

Attached are two exhibits from the Los Angeles case. They show unequivocally that your client was engaging in and carrying on an entertainment business/business venture in both Miami-Dade and Orlando.

Indictment count 4  
TRANSACTION #84

Date: 4/14/2016

Amount: \$9156

Invoice # 5 - 1206

\*Erika Girardi and Marco Marco worked together for nearly 4 years  
brought up any issue with billing

\*American Express statements reveal hotel and travel purchases co

\*Corresponding texts with Laia Ribatella confirm client's knowled

\*American Express made NO effort at time of transaction or after

**\*American Express refunded Erika Jayne \$78**

**ERIKA JAYNE**  
— LIVE —  
SATURDAY **MAY 14TH**  
HOSTED BY:  
**MARCO MARCO**  
Bravo  
Real Housewives  
1915 NW MIAMI CT | MIAMI, FL | FOR TABLE RESERVATIONS 305-521-9056  
TICKETS: WANTICKETS.COM/ERIKAJAYNE

**WE**  
**W**  
SOUTH FLORIDA QUEEN JUDGE SATURDAY  
1915 NW MIAMI CT | MIAMI, FL | FOR TABLE RESERVATIONS 305-521-9056  
WWW.WANTICKETS.COM/ERIKAJAYNE





Indictment count 5  
TRANSACTION #96

Date: 5/23/2016

Amount: \$9256.37

Invoice #

\*Erika Girardi and Marco Marco worked together for nearly 4 years  
brought up any issue with billing

\*American Express statements reveal hotel and travel purchases co

\*Corresponding texts with Laia Ribatella confirm client's knowled

**\*American Express made NO effort at time of transaction or after**

**\*American Express refunded Erika Jayne \$78**



theprettytymess • Follow

Parliament House Orlando



theprettytymess Last night in

346w



Amazing wo

340w Reply



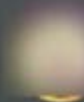
#BRITNEYSPEARS

341w Reply



Liked by kevinmylrea22 and 1

JUNE 4, 2016



Follow



I think it is rather obvious that filing a motion based on lack of personal jurisdiction given the Florida long arm statute regarding carrying on a business venture is not only a loser, it is likely frivolous.

Please call me to discuss.

All the best,

Bruce Bealke

310 562 6856

---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Tuesday, November 19, 2024 2:54 PM  
**To:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Cc:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Re: The order approving my pro hoc vice admission

Mr. Wilkes,

To add on to what Bruce stated, by end of week I am expecting your responsive pleading filed by close of business, 5 pm EST on Friday, November 22. Please allow this email to serve as confirmation that no further extensions will be given. A two month extension to file an answer is beyond generous.

Sincerely,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Tue, Nov 19, 2024 at 1:09 PM BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

Hi Jim.

Jenna and I fully expect all your responsive pleadings will be filed this week.

Please confirm.

Sent from [Proton Mail](#) for iOS

On Mon, Nov 18, 2024 at 1:59 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Okay. I will get Laia to sign the waiver and will return it to you. I do not intend to file a motion raising personal jurisdiction for Erika at this time. I also do not perceive Erika's motions to dismiss as such that would preclude beginning discovery. My focus is on the allegations in your complaint about the Girardi conspirators. That is where the financial affairs were always planned and carried out. I don't see the AMEX connection. I also don't see Morante ever being defamed. My insight on the AMEX issues are founded upon the breadth of their distribution. I certainly don't see the Secret Service and the DOJ as complicit. Nevertheless, I will not get in your way if

they don't mind your seeking the discovery. The law may extinguish your claims in Florida. Your and other defamed persons with SOL problems have energized those who think defamation is not an act that lives on. The single action rule may way heavy. Disregard for corporate form is also present in this case. If you have any dream of going in search of the facts to prove your vision of what exists in your case, I am giving you a chance to do that. If that's all you want, you should have no problem with the way I am willing to follow procedure.

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Monday, November 18, 2024 4:33 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)  
**Subject:** RE: The order approving my pro hoc vice admission

Jim, there's nothing to talk about.

We sent you the return of service for Laia that you've agreed to take.

We are not altering our approach.

Please follow your responsive pleadings answer/any motions or answer this week, please.

We are confident in our pleadings, and if you wish to follow a counter claim, feel free to do so.

Have a pleasant day.

Sent from [Proton Mail](#) for iOS

On Mon, Nov 18, 2024 at 1:26 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Can I talk to you and your co-counsel now?

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Sunday, November 17, 2024 5:39 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Re: The order approving my pro hoc vice admission

Jim:

The deal is extremely simple and it's not difficult to understand.

If you agree to file an answer tomorrow and put in your answer, your affirmative defense of statute of imitations, waive any and all motions to dismiss at this stage including but limited to personal jurisdiction (all three defendants have actively carried on business ventures in the state of Florida; to claim otherwise is simply untrue) and stipulate to the depositions on the dates of my choosing of the following Individuals:

Peter Grimm,

Robert Savage,

Kenneth Henderson,



Steve Scarince,

Brian Murphy,

Jeff Irvine.

Laureen Seeger

George Pence,

Larry Middleton

Assuming you do all of the above I will stipulate to not propound any discovery to your three clients in any manner for six months. Further, I will have my clients both CHRIS and Marco agree to not do any press of any type for the same six month.

I will not dismiss any of your clients until I have these depositions or there is a global settlement, which is the point of these depositions.

Should you not agree to these terms, We will protect our clients rights accordingly.

Be aware that any motion to dismiss for personal jurisdiction will be deemed by me as frivolous. Laia and Mikey traveled everywhere she went.

It will be met with the motion for sanctions and other appropriate relief.

Bruce

On Mon, Nov 11, 2024 at 4:00 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Thanks

> On Nov 11, 2024, at 12:43 PM, BealkeLaw  
> <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

>

>

> Empty Message

> <2024.8.19 PROPOSED ORDER GRANTING MOTION TO  
APPEAR PRO HAC VICE (Movant).pdf>

---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Tuesday, November 19, 2024 2:54 PM  
**To:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Cc:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
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Sincerely,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
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Panama City, Florida 32401  
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Fax: (850) 252-1015  
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On Mon, Nov 18, 2024 at 1:59 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

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they don't mind your seeking the discovery. The law may extinguish your claims in Florida. Your and other defamed persons with SOL problems have energized those who think defamation is not an act that lives on. The single action rule may way heavy. Disregard for corporate form is also present in this case. If you have any dream of going in search of the facts to prove your vision of what exists in your case, I am giving you a chance to do that. If that's all you want, you should have no problem with the way I am willing to follow procedure.

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Monday, November 18, 2024 4:33 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)  
**Subject:** RE: The order approving my pro hoc vice admission

Jim, there's nothing to talk about.

We sent you the return of service for Laia that you've agreed to take.

We are not altering our approach.

Please follow your responsive pleadings answer/any motions or answer this week, please.

We are confident in our pleadings, and if you wish to follow a counter claim, feel free to do so.

Have a pleasant day.

Sent from [Proton Mail](#) for iOS

On Mon, Nov 18, 2024 at 1:26 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Can I talk to you and your co-counsel now?

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Sunday, November 17, 2024 5:39 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Re: The order approving my pro hoc vice admission

Jim:

The deal is extremely simple and it's not difficult to understand.

If you agree to file an answer tomorrow and put in your answer, your affirmative defense of statute of imitations, waive any and all motions to dismiss at this stage including but limited to personal jurisdiction (all three defendants have actively carried on business ventures in the state of Florida; to claim otherwise is simply untrue) and stipulate to the depositions on the dates of my choosing of the following Individuals:

Peter Grimm,

Robert Savage,

Kenneth Henderson,

Steve Scarince,

Brian Murphy,

Jeff Irvine.

Laureen Seeger

George Pence,

Larry Middleton

Assuming you do all of the above I will stipulate to not propound any discovery to your three clients in any manner for six months. Further, I will have my clients both CHRIS and Marco agree to not do any press of any type for the same six month.

I will not dismiss any of your clients until I have these depositions or there is a global settlement, which is the point of these depositions.

Should you not agree to these terms, We will protect our clients rights accordingly.

Be aware that any motion to dismiss for personal jurisdiction will be deemed by me as frivolous. Laia and Mikey traveled everywhere she went.

It will be met with the motion for sanctions and other appropriate relief.

Bruce

On Mon, Nov 11, 2024 at 4:00 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Thanks

> On Nov 11, 2024, at 12:43 PM, BealkeLaw  
> <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

>

>

> Empty Message

> <2024.8.19 PROPOSED ORDER GRANTING MOTION TO  
APPEAR PRO HAC VICE (Movant).pdf>

---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Friday, December 13, 2024 2:07 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** THIRD AND FINAL ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

This shall be our third and final attempt to coordinate the scheduling of your motion to dismiss. We all know your motion is without merit and your delay in scheduling, or even responding to a single one of my emails, just furthers my point.

Again, please coordinate with me to set your motion for a hearing pursuant to the administrative orders in Miami-Dade County. I will seek sanctions, costs, and fees. Schedule your motion or withdraw it. You are delaying the inevitable.

Thank you,

--

Jenna Garmon, Esq.  
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Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Dec 9, 2024 at 10:16 AM Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

Dear Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. You will recall as a measure of our good faith, we granted you a thirty day extension to file a responsive pleading, which turned into two months. If no response is received from you or your staff in a timely manner, I will pursue court



intervention including costs and fees for your dilatory tactics and conduct.

Kind regards,

Jenna Garmon, Esq.  
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Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Dec 2, 2024 at 3:46 PM Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

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**Sent:** Monday, December 16, 2024 4:45 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,  
Special sets are only given for 15 minutes at a time. Judge Trawick's motion calendar has the following dates and times available: January 21, 23, 28, and 30 from 9 a.m. until 10:30 a.m. February 4, 6, 11, 13 9 a.m. to 10:30 a.m. Below is a screenshot.

The screenshot displays a calendar grid for Judge Trawick's motion calendar. It shows dates from January 21 to February 13, 2025. For each date, there are two time slots: 9AM - 10:30AM and 9AM - 10AM. Each slot is marked with a blue 'MC' icon and a blue 'Available' button. The dates shown are: January 21, 22, 23, 28, 29, 30; February 4, 5, 6, 11, 12, 13.

Date	Time Slot	Status
January 21, 2025	9AM - 10:30AM	Available
January 22, 2025	9AM - 10AM	Available
January 23, 2025	9AM - 10:30AM	Available
January 28, 2025	9AM - 10:30AM	Available
January 29, 2025	9AM - 10AM	Available
January 30, 2025	9AM - 10:30AM	Available
February 4, 2025	9AM - 10:30AM	Available
February 5, 2025	9AM - 10AM	Available
February 6, 2025	9AM - 10:30AM	Available
February 11, 2025	9AM - 10:30AM	Available
February 12, 2025	9AM - 10AM	Available
February 13, 2025	9AM - 10:30AM	Available

Do any of these days work for you?

To what other motions are you referring? I do not mind helping you schedule, however, as you are the movant, the rules imply that you are to schedule it as well as upload supporting documents through courtMAP. **Please have your staff register you at this address so we can schedule:** <https://cmap.jud11.flcourts.org/ebench/register.jsp>

Yes, we will be filing a response, however, the local rules give us until seven days prior to the scheduled hearing.

With regard to your statement that I have little regard for your motion; in fact, quite the opposite. Your motion was well written. I respect and acknowledge your strong advocacy for victims of nursing homes. But here, we have a difference of legal opinion, and your motion, despite its persuasive tone, is simply misguided.

Please consider this my final good faith attempt to schedule. I have provided you with a link to the scheduling platform above. There are also video tutorials

here: <https://www.jud11.flcourts.org/Programs-and-Services/Online-Services/courtmap>

Per your request, I will forward you attempt number 2 and attempt number 3.

I look forward to hearing from you soon.

Thank you,  
Jenna Garmon, Esq.

On Fri, Dec 13, 2024 at 1:37 PM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Ms. Garmon, Your email today stated it was your third attempt to set the hearing. I have not received a second attempt per my outlook email. As I am sure you know, you can take the initiative and set a motion for hearing after clearing the dates with opposing counsel. If you provide me with the available dates, I will respond with my availability. By the way, there isn't just one motion. These motions will require at least an hour for argument. I have not received any response to the motions. Do you intend to file anything? My scheduling assistant will look at dates of availability. I do see that we will require a special setting. Do you want to appear telephonically? I have limited availability over the next 2 months because of trials in January and February. Nevertheless, I will try to be available if we can get the time from the court. Please stop threatening me and telling me how little regard you have for the motions I have filed to date. And send me your "second attempt" email.

Jim Wilkes

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Monday, December 2, 2024 4:46 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

**Subject:** FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

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**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Tuesday, December 17, 2024 8:09 AM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Jim,

Thanks for getting back to me. By special set, are you asking for all three motions to be heard back to back at 90 minutes each? Essentially asking for a half day before the court? Thank you for the clarification.

Jenna

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On Tue, Dec 17, 2024 at 12:48 AM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Jenna., these are 3 Motion to Dimiss over lack of personal jurisdiction. I assume you will file a robust response, accordingly my experience tells me that we will likely need 90 minutes to do all 3 motions. Each are unique so each must be argued separately. Do you want to consider a stipulation and jointly ask for a special set hearing?

On Dec 16, 2024, at 4:45 PM, Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

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Do any of these days work for you?

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Per your request, I will forward you attempt number 2 and attempt number 3.

I look forward to hearing from you soon.

Thank you,  
Jenna Garmon, Esq.

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Jim Wilkes

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Monday, December 2, 2024 4:46 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

**Subject:** FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

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Thank you,

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**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Tuesday, December 17, 2024 3:01 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Which date of the ones I sent you work?

Jenna Garmon, Esq.  
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90 mins total

On Dec 17, 2024, at 7:09 AM, Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

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**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff  
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**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>

**Sent:** Wednesday, December 18, 2024 4:59 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com); TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>

**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Jim:

Jenna and I want you to immediately set your motion on the courts calendar.

I urge you in the strongest terms to pick a date in early to mid February and let's have all three motions heard.

Bruce Bealke

Sent from [Proton Mail](#) for iOS

On Mon, Dec 16, 2024 at 10:48 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

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Jenna Garmon, Esq.

On Fri, Dec 13, 2024 at 1:37 PM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Ms. Garmon, Your email today stated it was your third attempt to set the hearing. I have not received a second attempt per my outlook email. As I am sure you know, you can take the initiative and set a motion for hearing after clearing the dates with opposing counsel. If you provide me with the available dates, I will respond with my availability. By the way, there isn't just one motion. These motions will require at least an hour for argument. I have not received any response to the motions. Do you intend to file anything? My scheduling assistant will look at dates of availability. I do see that we will require a special setting. Do you want to appear telephonically? I have limited availability over the next 2 months because of trials in January and February. Nevertheless, I will try to be available if we can get the time from the court. Please stop threatening me and telling me how little regard you have for the motions I have filed to date. And send me your "second attempt" email.

Jim Wilkes

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Monday, December 2, 2024 4:46 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff  
<[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

**Subject:** FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing.  
Bruce and I are available starting mid-January. Judge  
Trawick's motion days are Tuesdays and Thursdays.  
Please coordinate with us through courtmap per the  
court's administrative orders.

Thank you,

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Fax: (850) 252-1015

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**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Wednesday, December 18, 2024 6:50 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

Again, please have your staff sign you up on courtMAP. I provided you instructions and a link. That is the way to schedule hearings. Also a special set is not going to be accommodated as it's only available in 5 minute increments.

You also sent me an email around 1 am the other morning asking to confer with me. Having me email the JA to set your motion and then telling me it's deficient on its face is not conferring.

Set your motion. I am not scheduling it for you. My efforts to assist are clearly not appreciated.

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On Wed, Dec 18, 2024 at 5:33 PM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Counsel, I told you I have a 2 week trial commencing on February 10 that has been set in the 6th Circuit. I can try to clear dates for Feb 3-5 if the court has availability. My read of the court rules leads me to believe a special setting will be necessary.

Do you want to send an email to the JA asking for clarification of how the court will entertain argument? A motion over personal jurisdiction requires the court to make a ruling on mixed questions of law and fact. Your complaint appears deficient on its face. I am assume you intend to present some fact based arguments which I don't see in the court file. The complaint fails to specify requisite facts defining which acts occurred including date, time and location that gives rise to jurisdiction in Florida over any of my 3 clients. Let me know if get dates from the court. If you do, I will try to accommodate you  
Jim

On Dec 18, 2024, at 4:59 PM, BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

Jim:

Jenna and I want you to immediately set your motion on the courts calendar.

I urge you in the strongest terms to pick a date in early to mid February and let's have all three motions heard.

Bruce Bealke

Sent from [Proton Mail](#) for iOS

On Mon, Dec 16, 2024 at 10:48 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Jenna., these are 3 Motion to Dismiss over lack of personal jurisdiction. I assume you will file a robust response, accordingly my experience tells me that we will likely need 90 minutes to do all 3 motions. Each are unique so each must be argued separately. Do you want to consider a stipulation and jointly ask for a special set hearing?

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<[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

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January 21, 23, 28, and 30 from 9 a.m. until 10:30 a.m. February 4, 6, 11, 13 9 a.m. to 10:30 a.m. Below is a screenshot.  
<image.png>

Do any of these days work for you?

To what other motions are you referring? I do not mind helping you schedule, however, as you are the movant, the rules imply that you are to schedule it as well as upload supporting documents through courtMAP.  
**Please have your staff register you at this address so we can**

**schedule: <https://cmap.jud11.flcourts.org/ebench/register.jsp>**

Yes, we will be filing a response, however, the local rules give us until seven days prior to the scheduled hearing.

With regard to your statement that I have little regard for your motion; in fact, quite the opposite. Your motion was well written. I respect and acknowledge your strong advocacy for victims of nursing homes. But here, we have a difference of legal opinion, and your motion, despite its persuasive tone, is simply misguided.

Please consider this my final good faith attempt to schedule. I have provided you with a link to the scheduling platform above. There are also video tutorials here: <https://www.jud11.flcourts.org/Programs-and-Services/Online-Services/courtmap>

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I look forward to hearing from you soon.

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**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

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Thank you,

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---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Thursday, December 26, 2024 11:20 AM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** Bruce Bealke <[bbealke@gmail.com](mailto:bbealke@gmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Schedule for Depositions

Mr. Wilkes,

I am reaching out to coordinate with you for depositions. I propose the following. Please confirm your availability:

1. Davis Rahal on January 15, 2025 (Las Vegas)
2. Nick Geurtz on January 22, 2025 (Miami)
3. Erika Girardi on January 29, 2025 (Manhattan)

All of those days are Wednesdays, and my understanding is that Ms. Girardi will not have any performances for "Chicago" on Wednesdays. The depositions will be in person, but we have no objection if you would like to attend via Zoom.

I look forward to hearing from you at your earliest convenience.

--

Jenna Garmon, Esq.  
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---

**Attachments:**

Letter requesting CMC.pdf

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Friday, February 7, 2025 5:06 PM

**To:** [ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)

**Cc:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Bruce Bealke <[bbealke@gmail.com](mailto:bbealke@gmail.com)>

**Subject:** Marco Morante v. Erika Girardi et al Miami-Dade County Case No.: 2024-015118-CA-01

Dear Mr. Soto,

We are attempting to schedule a case management conference. Please see attached correspondence. Opposing counsel is copied on this email.

Thank you in advance for your assistance.

Sincerely,

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
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Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
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---

From: noreply@jud11.flcourts.org <noreply@jud11.flcourts.org>  
Sent: Monday, March 3, 2025 3:17 PM  
Subject: COURT EVENT STATUS UPDATE: 2024-015118-CA-01

This is a system generated email. Please do not reply to this message.

Please DO NOT efile documents received from courtMAP. The Court will efile all documents once approved.

Please verify your scheduled time, as the duration may have been updated.

Sequence Number: 19  
Category: Motion Calendar  
Schedule Date and Time: 03-11-2025 9:00 AM - 03-11-2025 10:30 AM Scheduled Before: Daryl E. Trawick (CA07) Case Number: 2024-015118-CA-01  
Style: Marco Morante vs Erika Girardi et al  
Motion: Motion for Case Management Conference  
Scheduler: Bealke, Bruce B.  
Created Date: 03-03-2025 3:17 PM  
Status: Ready

Courthouses are open to the public as of June 28, 2021. The Eleventh Circuit remains committed to your health. We continue to follow, and urge you to follow, all CDC guidelines.

At this time, your matter may be heard via the Zoom platform in our Virtual Courtroom, or in person in the designated Courtroom in our Courthouse. Please check the official notice for your matter to determine whether it will be heard remote via Zoom or in person

If the hearing is in person, you must appear at the Courthouse. If your matter is proceeding remote in the Virtual Courtroom via the Zoom platform, the Court will send you an email with a Zoom link and instructions approximately a day before the hearing. If you resolve your matter, please cancel it in courtMAP, or, if you have no access to courtMAP, cancel it by calling the judge's judicial assistant.

Please visit the Judge's webpage ([https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.jud11.flcourts.org%2fAbout-the-Court%2fJudges%2fJudicial-Directory&c=E,1,BIAaKgBVVWu2Q9RO2LtkqqUr7s-WstGArGmvOllgNEDASOGGo\\_DI96IAoKJtRSAfnP57nnRSDRIQ0kM0CGV6AspDCyiCNqi631f8M8mAgA1s,&typo=1](https://linkprotect.cudasvc.com/url?a=https%3a%2f%2fwww.jud11.flcourts.org%2fAbout-the-Court%2fJudges%2fJudicial-Directory&c=E,1,BIAaKgBVVWu2Q9RO2LtkqqUr7s-WstGArGmvOllgNEDASOGGo_DI96IAoKJtRSAfnP57nnRSDRIQ0kM0CGV6AspDCyiCNqi631f8M8mAgA1s,&typo=1)) for additional instructions.

The 11th Judicial Circuit serves the citizens of Miami-Dade County Florida. The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Monday, March 10, 2025 2:26 PM  
**To:** Soto, Albert <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)>  
**Cc:** Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>; Bruce Bealke <[bbealke@gmail.com](mailto:bbealke@gmail.com)>; Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; [a862b9789+matter1799667327@maildrop.clio.com](mailto:a862b9789+matter1799667327@maildrop.clio.com)  
**Subject:** Re: Case No. 2024-015118-CA-01

Thank you for the clarification.

Jenna Garmon, Esq.  
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On Mon, Mar 10, 2025 at 1:24 PM Soto, Albert <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)> wrote:

All hearings are by zoom, unless directed by the court. So yes, it is by zoom.

---

**From:** Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Sent:** Monday, March 10, 2025 2:17 PM  
**To:** Soto, Albert <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)>  
**Cc:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Subject:** Case No. 2024-015118-CA-01

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello,

I am just confirming Case No. 2024-015118-CA-01 is set to be heard by zoom tomorrow morning at 9 am Eastern Time?

Thank

--

Respectfully,

Chris Taylor

The Garmon Law Firm

(850) 238-3201

---

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**Sent:** Monday, March 10, 2025 5:33 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)

**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Jim:

As you should know by now there is a hearing tomorrow at 9 AM Eastern 8 AM central on Zoom with Judge Trawick. I urge you in the strongest terms to make sure you show up for the hearing or have someone in your office be able to deal with the issues.

We have tried for weeks if not months on end to be cordial with you so far, you have refused to schedule your motion. Tomorrow is a case management conference or at least A motion to schedule a case management conference.

We are looking forward to getting a trial date and moving forward with discovery and motions.

Sent from [Proton Mail](#) for iOS

On Wed, Dec 18, 2024 at 9:15 PM, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Counsel, your complaint does not sufficiently allege any basis for specific or general jurisdiction in Florida against the 3 California resident. There is no description of dates, times or any acts sufficient to support either a defamation claim or a claim for tortious interference with a contract. No actual contract is even attached to the complaint. The reference to the February 2023 LA Times article fails to state any fact that supports either of the pled counts. Having re-read the papers, I will ask the court to rule on the papers pending before the court. I see no need for a hearing. This is your burden and I believe you have not come close to presenting either facts or law to sustain your obligation

Jim

On Dec 18, 2024, at 4:59 PM, BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)> wrote:

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Bruce Bealke

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Do any of these days work for you?

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---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Tuesday, March 11, 2025 8:22 AM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Fw: COURT EVENT HEARING REMINDER: 2024-015118-CA-01

----- Forwarded message -----

From: noreply <[noreply@jud11.flcourts.org](mailto:noreply@jud11.flcourts.org)>  
Date: On Fri, Mar 7, 2025 at 4:01 AM  
Subject: Fw: COURT EVENT HEARING REMINDER: 2024-015118-CA-01  
To:  
Cc:

This is a system generated email. Please do not reply to this message.

**Your case is scheduled for the following:**

Category: Motion Calendar  
Scheduled Date and Time: Mar 11 2025 9:00AM  
Judge Name: Daryl E. Trawick (CA07)  
Case Number: 2024-015118-CA-01  
Style: Marco Morante vs Erika Girardi et al  
Motion: Motion for Case Management Conference  
Scheduler: Bealke, Bruce B.  
Created Date: Mar 03 2025

**Reminder:**

- All courtesy copies and supporting documents are due now.
- You must follow meet and confer requirements.
- Check notice of hearing for location.
- If this matter resolves or you wish to cancel, follow instructions in [judge's webpage](#). This hearing remains set until cancelled.

The 11th Judicial Circuit serves the citizens of Miami - Dade County Florida. The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and / or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

---

**From:** Bruce Bealke <[bbealke@gmail.com](mailto:bbealke@gmail.com)>  
**Sent:** Tuesday, March 11, 2025 8:26 AM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Subject:** Fwd: Case No. 2024-015118-CA-01

Bruce Bealke  
310 562 6856  
(Please excuse any typos)  
Sent from my iPad

Begin forwarded message:

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Date:** March 10, 2025 at 1:32:18 PM CDT  
**To:** "Soto, Albert" <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)>  
**Cc:** Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>, Bruce Bealke <[bbealke@gmail.com](mailto:bbealke@gmail.com)>, Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>, TPA JLW Staff <[jlwstaff@yourcasematters.com](mailto:jlwstaff@yourcasematters.com)>, [a862b9789+matter1799667327@maildrop.clio.com](mailto:a862b9789+matter1799667327@maildrop.clio.com)  
**Subject:** Re: Case No. 2024-015118-CA-01

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Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Mon, Mar 10, 2025 at 1:24 PM Soto, Albert <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)> wrote:

All hearings are by zoom, unless directed by the court. So yes, it is by zoom.

---

**From:** Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Sent:** Monday, March 10, 2025 2:17 PM  
**To:** Soto, Albert <[ASoto@jud11.flcourts.org](mailto:ASoto@jud11.flcourts.org)>  
**Cc:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Subject:** Case No. 2024-015118-CA-01

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hello,

I am just confirming Case No. 2024-015118-CA-01 is set to be heard by zoom tomorrow morning at 9 am Eastern Time?

Thank

--

Respectfully,

Chris Taylor

The Garmon Law Firm

(850) 238-3201

---

**From:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>  
**Sent:** Wednesday, March 12, 2025 3:04 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>  
**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)  
**Subject:** Morante v. Girardi, et al MEET AND CONFER REQUEST

**March 12, 2025**

**VIA EMAIL and TEXT MESSAGE**

James Lewis Wilkes II  
Wilkes & Associates, P.A.  
3550 Buschwood Park Dr Ste 230  
Tampa, FL 33618-4437

**Re: Morante vs. Girardi, et. al – Meet and Confer Request**

Dear Jim,

Pursuant to the Court's request, this correspondence serves as our formal request to meet and confer with you regarding the above-referenced pending case. We are prepared to accommodate any date and time that works for you and remain committed to expediting this matter to reach a trial date as soon as possible.

Our goal in this meet and confer is to address the issues raised in your motion and to ensure that all procedural and evidentiary matters are resolved efficiently and in accordance with the Court's directives. The following issues necessitate discussion:

**I. Motion to Dismiss for Lack of Personal Jurisdiction**

We respectfully submit that your motion to dismiss fails to account for fundamental principles of Florida's long-arm statute and its well-established doctrines of general jurisdiction. Accordingly, we intend to oppose the motion with multiple affidavits and other admissible evidence.

Florida's long-arm statute, as interpreted in *Internet Solutions Corp. v. Marshall*, 39 So. 3d 1201, provides a clear basis for asserting jurisdiction in this matter. We are confident that the evidence we will present will demonstrate the appropriateness of jurisdiction under both statutory and constitutional standards.

**II. Evidentiary Hearing**

During today's proceedings before Judge Trawick, you indicated a desire for an evidentiary hearing on your motion. We found this statement unexpected, particularly in light of your December 18 email, in which you unequivocally stated:

*"Having re-read the papers, I will ask the court to rule on the papers pending before the court. I see no need for a hearing. This is your burden, and I believe you have not come close to presenting either facts or law to sustain your obligation."*

Given this prior statement, we believe the motion can and should be resolved based on the motion, your affidavits, and the response we will file with our affidavits once a hearing date is set.

That said, if you proceed with requesting an evidentiary hearing, we will seek the opportunity to depose any witnesses you identify for the hearing. Additionally, we will request jurisdictional depositions of three named defendants should you choose not to have them testify, as well as depositions of third-party witnesses with personal knowledge of actions that invoke both Florida's long-arm statute and general jurisdiction.

**Conclusion**

Given that the only motion currently filed is your motion to dismiss for lack of personal jurisdiction, we respectfully submit that no other matters are of relevance arise for which we should meet and confer at this time.

We trust that this correspondence clarifies our position on the issues at hand. Please let us know your availability for a meet and confer at your earliest convenience. Please provide one or more dates and time and we will work around your schedule. We remain committed to resolving these matters expeditiously and in good faith.

We look forward to your prompt response and remain available to discuss these matters further at your earliest convenience.

Sincerely,

*/s/ Bruce Bealke*

Bruce Bealke, Esq.

310 562 6856

FL PHV#1057242

---

**Attachments:**

218817376 Notice Of Hearing.pdf

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Friday, March 14, 2025 12:42 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>; Rosslynn Roberts <[office@garmonlawpc.com](mailto:office@garmonlawpc.com)>; [a862b9789+matter1799667327@maildrop.clio.com](mailto:a862b9789+matter1799667327@maildrop.clio.com)

**Subject:** Notice of Hearing/ CASE NUMBER 132024CA01511801GE01 Marco Morante vs Erika Girardi et al

**Good Afternoon,**

**Please find attached a courtesy copy of the Notice of Hearing, as efiled, setting the Case Management Conference for March 20, 2025 at 9 a.m. EST.**

**Zoom instructions are included in the notice.**

**Thank you,**

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

----- Forwarded message -----

From: <[eservice@myflcourtagency.com](mailto:eservice@myflcourtagency.com)>

Date: Fri, Mar 14, 2025 at 11:35 AM

Subject: SERVICE OF COURT DOCUMENT CASE NUMBER 132024CA01511801GE01 Marco Morante vs Erika Girardi et al

To:

Notice of Service of Court Documents

Filing Information

Filing #: [218817376](#)

Filing Time: 03/14/2025 12:35:07 PM ET

Filer: Jenna Garmon 850-238-3201

Court: Eleventh Judicial Circuit in and for Miami-Dade County, Florida

Case #: 132024CA01511801GE01

Court Case #: 2024-015118-CA-01

Case Style: Marco Morante vs Erika Girardi et al

Documents Click on the file name below to download or print your document NOW. The link expires in 14 days

#### Documents

Title	File
Notice Of Hearing	<a href="#">NOH CMC Morante .pdf</a>

#### E-service recipients selected for service:

Name	Email Address
N/A	<a href="mailto:office@garmonlawpc.com">office@garmonlawpc.com</a>
James L Wilkes II	<a href="mailto:JimW@yourcasematters.com">JimW@yourcasematters.com</a>
	<a href="mailto:jlwstaff@yourcasematters.com">jlwstaff@yourcasematters.com</a>
	<a href="mailto:Fl@yourcasematters.com">Fl@yourcasematters.com</a>
Jenna Garmon	<a href="mailto:jenna@garmonlawpc.com">jenna@garmonlawpc.com</a>
	<a href="mailto:eservice@garmonlawpc.com">eservice@garmonlawpc.com</a>
	<a href="mailto:office@garmonlawpc.com">office@garmonlawpc.com</a>
Bruce B. Bealke	<a href="mailto:BealkeLaw@protonmail.com">BealkeLaw@protonmail.com</a>

#### E-service recipients not selected for service:

Name	Email Address
No Matching Entries	

This is an automatic email message generated by the Florida Courts E-Filing Portal. This email address does not receive email.

**Document Access Link(s) will be active for 14 days (excluding weekends) after the Clerk accepts the submission or it is abandoned. In addition to access to the link for 14 days (excluding weekends), the documents will also be available, after acceptance by the Clerk, to counsel of record in the portal on the My Cases page, by clicking on the case number and then the document name, or by accessing the Clerk's website.**

If you are not associated with this case and wish to be removed, please click [here](#) to request to be removed from the E-service list.

Thank you,  
The Florida Courts E-Filing Portal

The following identifier(s) are associated with this transaction:

request\_id#:218817376;Audit#:750677141;UCN#:132024CA01511801GE01;

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

Case No.: 2024-015118-CA-01

Division: CA07

MARCO MORANTE

Plaintiff,

vs.

ERIKA GIRARDI AKA ERIKA JAYNE, LAIA  
RIBATALLADA and MICHAEL MINDEN

Defendants

**NOTICE OF HEARING**

**To each party and to the attorney of record for each party in this action:**

NOTICE IS GIVEN that a hearing has been set for **March 20, 2025 at 9 a.m. EST** via Zoom Video. At that time, or as soon after that time as the docket permits, the following matter will be heard by the Court: **Case Management Conference.**

**Zoom Instructions**

**Meeting ID: 369 197 3247**

**<https://zoom.us/j/3691973247?omn=94302410300>**

PLEASE GOVERN YOURSELF ACCORDINGLY.

**CERTIFICATE OF SERVICE**

I certify that a copy of this document was electronically served via the Florida Courts E-Filing Portal to James L. Wilkes, II, Esq., attorney for Erika Girardi aka Erika Jayne, Laia Ribatallada, and Michael Minden, 3550 Buschwood Park Drive, Suite 230, Tampa, Florida 33618, e-mail address [jimw@yourcasematters.com](mailto:jimw@yourcasematters.com), [jlwstaff@yourcasematters.com](mailto:jlwstaff@yourcasematters.com), and Bruce Bealke, Esq., *Pro Hac Vice Counsel for Plaintiff* at [BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com) on March 14, 2025.



Respectfully submitted,

**The Garmon Law Firm, PLLC**

/S/ JENNA GARMON

---

Jenna Garmon, Esq.

Attorney for Plaintiff

Florida Bar Number: 1002531

The Garmon Law Firm, PLLC

502 Harmon Ave

Panama City, Florida 32401

Telephone: (850) 238-3201

Fax: (850) 252-1015

E-Mail: Jenna@GarmonLawPC.com

Secondary E-Mail: eService@GarmonLawPC.com

**NOTICE TO PERSONS WITH DISABILITIES:**

**If you are a person with a disability who needs an accommodation to participate in a court proceeding, please contact Alean Simpkins, the Eleventh Judicial Circuit Court ADA Coordinator Lawson E. Thomas Courthouse Center, 175 NW 1st Ave., Suite 2400, Miami, FL 33128, Telephone [305-349-7175](tel:305-349-7175); TDD [305-349-7174](tel:305-349-7174); Email [ADA@jud11.flcourts.org](mailto:ADA@jud11.flcourts.org); Fax (305) 349-7355 at least seven (7) days before your scheduled court appearance or immediately upon receiving this notification if the time before the scheduled appearance is less than seven (7) days; if you are hearing or voice impaired, call 711.**

---

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>  
**Sent:** Friday, March 14, 2025 3:32 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>; Chris Taylor <[chris@garmonlawpc.com](mailto:chris@garmonlawpc.com)>  
**Subject:** Re: FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

I sent you and your staff a courtesy copy of the filed notice of hearing. Please advise if you didn't receive it. It was sent around 12:30 pm today.

Jenna Garmon, Esq.  
The Garmon Law Firm, PLLC  
Adoption & Family Law  
502 Harmon Ave  
Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

On Fri, Mar 14, 2025 at 1:34 PM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Please send the NOH for the hearing we attended this week. Thanks  
Jenna, my scheduler is well versed in the Dade County calendar system. All the circuits are, or have, rapidly moved in the same direction. It would seem that

On Dec 16, 2024, at 4:45 PM, Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)> wrote:

Mr. Wilkes,  
Special sets are only given for 15 minutes at a time. Judge Trawick's motion calendar has the following dates and times available: January 21, 23, 28, and 30 from 9 a.m. until 10:30 a.m. February 4, 6, 11, 13 9 a.m. to 10:30 a.m. Below is a screenshot.

<image.png>

Do any of these days work for you?

To what other motions are you referring? I do not mind helping you schedule, however, as you are the movant, the rules imply that you are to schedule it as well as upload supporting documents through courtMAP. **Please have your staff register you at this address so we can schedule:** <https://cmap.jud11.flcourts.org/ebench/register.jsp>

Yes, we will be filing a response, however, the local rules give us until seven days prior to the scheduled hearing.

With regard to your statement that I have little regard for your motion; in fact, quite the opposite. Your motion was well written. I respect and acknowledge your strong advocacy for victims of nursing homes. But here, we have a difference of legal opinion, and your motion, despite its persuasive tone, is simply misguided.

Please consider this my final good faith attempt to schedule. I have provided you with a link to the scheduling platform above. There are also video tutorials here: <https://www.jud11.flcourts.org/Programs-and-Services/Online-Services/courtmap>

Per your request, I will forward you attempt number 2 and attempt number 3.

I look forward to hearing from you soon.

Thank you,  
Jenna Garmon, Esq.

On Fri, Dec 13, 2024 at 1:37 PM Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)> wrote:

Ms. Garmon, Your email today stated it was your third attempt to set the hearing. I have not received a second attempt per my outlook email. As I am sure you know, you can take the initiative and set a motion for

hearing after clearing the dates with opposing counsel. If you provide me with the available dates, I will respond with my availability. By the way, there isn't just one motion. These motions will require at least an hour for argument. I have not received any response to the motions. Do you intend to file anything? My scheduling assistant will look at dates of availability. I do see that we will require a special setting. Do you want to appear telephonically? I have limited availability over the next 2 months because of trials in January and February. Nevertheless, I will try to be available if we can get the time from the court. Please stop threatening me and telling me how little regard you have for the motions I have filed to date. And send me your "second attempt" email.

Jim Wilkes

**From:** Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>

**Sent:** Monday, December 2, 2024 4:46 PM

**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>

**Cc:** BealkeLaw <[BealkeLaw@protonmail.com](mailto:BealkeLaw@protonmail.com)>; TPA JLW Staff <[JLWStaff@yourcasematters.com](mailto:JLWStaff@yourcasematters.com)>

**Subject:** FIRST ATTEMPT TO SCHEDULE/Motion to Dismiss hearing/GIRARDI ET AL

Mr. Wilkes,

Please set your Motion to Dismiss for a hearing. Bruce and I are available starting mid-January. Judge Trawick's motion days are Tuesdays and Thursdays. Please coordinate with us through courtmap per the court's administrative orders.

Thank you,

--

Jenna Garmon, Esq.

The Garmon Law Firm, PLLC

Adoption & Family Law

502 Harmon Ave

Panama City, Florida 32401

Ph: (850) 238-3201

Fax: (850) 252-1015

[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

--

Jenna Garmon, Esq.  
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Panama City, Florida 32401  
Ph: (850) 238-3201  
Fax: (850) 252-1015  
[www.GarmonLawPC.com](http://www.GarmonLawPC.com)

# Exhibit 6

---

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>  
**Sent:** Saturday, March 15, 2025 4:54 PM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** [jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com); BealkeLaw <[bealkelaw@protonmail.com](mailto:bealkelaw@protonmail.com)>  
**Subject:** Morante adv. Girardi

Jim:

Good afternoon. I wanted to reach out and introduce myself as I just made my appearance.

I would also like to jump on a call Monday to discuss the CMC hearing this week and perhaps even resolve the matter without court intervention. Let me know when you are free Monday to discuss.

Thanks and have a great weekend.

Jason

**Jason P. Stearns**  
*Partner*

---

**p** | 813-488-2926  
**f** | 813-488-2960  
**e** | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)  
201 North Franklin Street | Suite 3550 | Tampa, FL 33602  
[www.sgrlaw.com](http://www.sgrlaw.com) | [My Bio](#)



---

**Attachments:**

DRAFT - Morante Proposed Order Denying Motion to Dismiss as Abandoned.docx

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>**Sent:** Thursday, March 20, 2025 1:39 PM**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>**Cc:** Perez, Anelys <[aeperez@sgrlaw.com](mailto:aeperez@sgrlaw.com)>; Bruce Bealke <[bruce@garmon-bealke.com](mailto:bruce@garmon-bealke.com)>; Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>**Subject:** RE: Morante adv. Girardi

Jim:

Good afternoon. We attended the CMC this morning and noted your absence. The Court ruled that your motion to dismiss is deemed abandoned and that it would entertain a motion for default. I have memorialized the court's ruling in the attached proposed order that I was asked to prepare by the Court. Please call me if you would like to discuss or if you have any questions about the order or what transpired at the hearing.

Jason

**Jason P. Stearns***Partner*

---

**p** | 813-488-2926**f** | 813-488-2960**e** | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)

201 North Franklin Street | Suite 3550 | Tampa, FL 33602

[www.sgrlaw.com](http://www.sgrlaw.com) | [My Bio](#)

---

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>**Sent:** Monday, March 17, 2025 9:40 AM**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>**Cc:** Perez, Anelys <[aeperez@sgrlaw.com](mailto:aeperez@sgrlaw.com)>**Subject:** RE: Morante adv. Girardi

Jim:

How does 11:30 work for you?

Jason

**Jason P. Stearns***Partner*



---

p | 813-488-2926  
f | 813-488-2960  
e | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)  
201 North Franklin Street | Suite 3550 | Tampa, FL 33602  
[www.sgrlaw.com](http://www.sgrlaw.com) | My Bio

---



---

**From:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Sent:** Monday, March 17, 2025 9:11 AM  
**To:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>  
**Subject:** Re: Morante adv. Girardi

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

What time are you available?

On Mar 15, 2025, at 4:54 PM, Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)> wrote:

Jim:

Good afternoon. I wanted to reach out and introduce myself as I just made my appearance.

I would also like to jump on a call Monday to discuss the CMC hearing this week and perhaps even resolve the matter without court intervention. Let me know when you are free Monday to discuss.

Thanks and have a great weekend.

Jason

**Jason P. Stearns**  
*Partner*

---

p | 813-488-2926  
f | 813-488-2960  
e | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)  
201 North Franklin Street | Suite 3550 | Tampa, FL 33602  
[www.sgrlaw.com](http://www.sgrlaw.com) | My Bio

---

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

MARCO MORANTE,

Plaintiff,

vs.

ERIKA GIRARDI aka ERIKA JAYNE, LAIA  
RIBATALIADA and MICHAEL MINDEN,

Defendants.

---

**ORDER DENYING DEFENDANTS' COMBINED MOTION TO DISMISS MARCO  
MORANTE'S COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

THIS CAUSE came before the Court for hearing on March 20, 2025, and the Court, for the reasons stated below and in open court, and being otherwise duly advised in the premises, finds:

1. Defendants' Combined Motion to Dismiss Marco Morante's Complaint for Lack of Personal Jurisdiction is **DENIED**.
2. On August 9, 2024, Plaintiff Marco Morante filed a complaint against Erika Girardi a/k/a Erika Jayne, Laia Ribatallada, and Michael Minden. (DIN # 4)
3. On November 22, 2024, the Defendants filed a Combined Motion to Dismiss Marco Morante's Complaint for Lack of Personal Jurisdiction. (DIN # 23-27)
4. Defendants did not take any action to set or attempt to set the Combined Motion to Dismiss for hearing.
5. On February 10, 2025, Plaintiff filed a Motion for Case Management Conference. The Motion for Case Management Conference stated that Plaintiff attempted for months to

schedule a hearing on Defendants' Combined Motion, but that Defendants refused to schedule the Combined Motion to Dismiss for hearing or to participate in discovery while the motion was pending. The e-mail correspondence attached as Exhibit A to the Motion for Case Management Conference supports Plaintiff's position.

6. On March 11, 2025, the Court held a case management conference, at which counsel for all parties was present. After hearing argument of counsel, the Court directed the parties to attend a case management conference on March 20, 2025 to discuss, among other things, the scheduling of the hearing on the Combined Motion to Dismiss.

7. Plaintiff filed and served the Notice of Hearing for the Case Management Conference to be heard on March 20, 2025 at 9:00 a.m. (DIN # 30).

8. On March 20, 2025 at 9:00 a.m., counsel for Plaintiff appeared at the scheduled case management conference. Counsel for Defendants did not appear.

9. Accordingly, the Court finds that Defendants have abandoned their Combined Motion to Dismiss, which is therefore DENIED.

10. The Court will entertain a motion for default by Plaintiff.

DONE and ORDERED in Chambers at Miami-Dade County, Florida, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

---

HONORABLE DARYL E. TRAWICK  
Circuit Court Judge

---

**Attachments:**

2025 03 20 Morante Proposed Order Denying Motion to Dismiss as Abandoned.docx

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>**Sent:** Thursday, March 20, 2025 3:27 PM**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>**Cc:** Perez, Anelys <[aeperez@sgrlaw.com](mailto:aeperez@sgrlaw.com)>; Bruce Bealke <[bruce@garmon-bealke.com](mailto:bruce@garmon-bealke.com)>; Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>**Subject:** RE: Morante adv. Girardi

Jim:

Good afternoon. You might have noticed that we filed the proposed order and then retracted it. That was an error on our end.

In any event, we made a few minor edits (added the case number and included the DIN for the motion for case management conference). See attached. We plan to file this before close of business today. I can't imagine you would have any comments about the substance given that you were not present, but my offer to discuss with you still stands. I am free the remainder of the afternoon if you want to call my direct line. (813-488-2926)

We will upload the proposed order around 5:00 pm. Thanks

Jason

**Jason P. Stearns***Partner*

p | 813-488-2926

f | 813-488-2960

e | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)

201 North Franklin Street | Suite 3550 | Tampa, FL 33602

[www.sgrlaw.com](http://www.sgrlaw.com) | [My Bio](#)

---

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>**Sent:** Thursday, March 20, 2025 1:39 PM**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>**Cc:** Perez, Anelys <[aeperez@sgrlaw.com](mailto:aeperez@sgrlaw.com)>; Bruce Bealke <[bruce@garmon-bealke.com](mailto:bruce@garmon-bealke.com)>; Jenna Garmon <[jenna@garmonlawpc.com](mailto:jenna@garmonlawpc.com)>**Subject:** RE: Morante adv. Girardi

Jim:

Good afternoon. We attended the CMC this morning and noted your absence. The Court ruled that your motion to dismiss is deemed abandoned and that it would entertain a motion for default. I have memorialized the court's ruling in the attached proposed order that I was asked to prepare by the Court. Please call me if you would like to discuss or if you have any questions about the order or what transpired at the hearing.

Jason

**Jason P. Stearns**  
*Partner*

---

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**f** | 813-488-2960  
**e** | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)  
201 North Franklin Street | Suite 3550 | Tampa, FL 33602  
[www.sgrlaw.com](http://www.sgrlaw.com) | [My Bio](#)



---

**From:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>  
**Sent:** Monday, March 17, 2025 9:40 AM  
**To:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Cc:** Perez, Anelys <[aeperez@sgrlaw.com](mailto:aeperez@sgrlaw.com)>  
**Subject:** RE: Morante adv. Girardi

Jim:

How does 11:30 work for you?

Jason

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**Jason P. Stearns**  
*Partner*

**p** | 813-488-2926  
**f** | 813-488-2960  
**e** | [jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)  
201 North Franklin Street | Suite 3550 | Tampa, FL 33602  
[www.sgrlaw.com](http://www.sgrlaw.com) | [My Bio](#)



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**From:** Jim Wilkes <[jimw@yourcasematters.com](mailto:jimw@yourcasematters.com)>  
**Sent:** Monday, March 17, 2025 9:11 AM  
**To:** Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)>  
**Subject:** Re: Morante adv. Girardi

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

What time are you available?

On Mar 15, 2025, at 4:54 PM, Stearns, Jason <[jstearns@sgrlaw.com](mailto:jstearns@sgrlaw.com)> wrote:

Jim:

Good afternoon. I wanted to reach out and introduce myself as I just made my appearance.

I would also like to jump on a call Monday to discuss the CMC hearing this week and perhaps even resolve the matter without court intervention. Let me know when you are free Monday to discuss.

Thanks and have a great weekend.

Jason

**Jason P. Stearns**

*Partner*

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**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

MARCO MORANTE,

Plaintiff,

Case No.: 2024-015118-CA-01

v.

ERIKA GIRARDI aka ERIKA JAYNE,  
LAIA RIBATALIADA, and  
MICHAEL MINDEN,

Defendant.

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**ORDER DENYING DEFENDANTS' COMBINED MOTION TO DISMISS MARCO  
MORANTE'S COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

THIS CAUSE came before the Court for hearing on March 20, 2025, and the Court, for the reasons stated below and in open court, and being otherwise duly advised in the premises, finds:

1. Defendants' Combined Motion to Dismiss Marco Morante's Complaint for Lack of Personal Jurisdiction is **DENIED**.

2. On August 9, 2024, Plaintiff Marco Morante filed a complaint against Erika Girardi a/k/a Erika Jayne, Laia Ribatallada, and Michael Minden. (DIN 4).

3. On November 22, 2024, the Defendants filed a Combined Motion to Dismiss Marco Morante's Complaint for Lack of Personal Jurisdiction. (DIN 23-27).

4. Defendants did not take any action to set or attempt to set the Combined Motion to Dismiss for hearing.

5. On February 10, 2025, Plaintiff filed a Motion for Case Management Conference. (DIN 28). The Motion for Case Management Conference stated that Plaintiff attempted for months to schedule a hearing on Defendants' Combined Motion, but that Defendants refused to schedule

the Combined Motion to Dismiss for hearing or to participate in discovery while the motion was pending. The e-mail correspondence attached as Exhibit A to the Motion for Case Management Conference supports Plaintiff's position.

6. On March 11, 2025, the Court held a case management conference, at which counsel for all parties was present. After hearing argument of counsel, the Court directed the parties to attend a case management conference on March 20, 2025 to discuss, among other things, the scheduling of the hearing on the Combined Motion to Dismiss.

7. Plaintiff filed and served the Notice of Hearing for the Case Management Conference to be heard on March 20, 2025 at 9:00 a.m. (DIN 30).

8. On March 20, 2025 at 9:00 a.m., counsel for Plaintiff appeared at the scheduled case management conference. Counsel for Defendants did not appear.

9. Accordingly, the Court finds that Defendants have abandoned their Combined Motion to Dismiss, which is therefore DENIED.

10. The Court will entertain a motion for default by Plaintiff.

DONE and ORDERED in Chambers at Miami-Dade County, Florida, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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HONORABLE DARYL E. TRAWICK  
Circuit Court Judge