

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
West Palm Beach Division
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In re: Case No. 21-15555 -EPK

PALM BEACH RESORT AND BEACH CLUB Chapter 11
CONDOMINIUM ASSOCIATION, INC.,

Debtor-in-Possession.

PALM BEACH RESORT AND BEACH CLUB
CONDOMINIUM ASSOCIATION, INC.,

Plaintiff.

Adv. Pro. No.: 21-01168-EPK

vs.

HPP HOLDINGS, LLC, *et. al.*,

Defendants.

**PLAINTIFFS MOTION FOR (A) ISSUANCE OF ALIAS SUMMONS
AS TO BRONZELLE PARHAM; AND VACATING CLERK'S DEFAULT AS TO
BRONZELL D. PARHAM**

Plaintiff, Palm Beach Resort and Beach Club Condominium Association, Inc. (the "Plaintiff" or "Debtor"), by undersigned counsel, pursuant to Bankruptcy Rule 7004 and Local Rule 7004, moves (the "Motion"), for the entry of an order (a) instructing the clerk of court to issue alias summons for the Defendant, Bronzell D. Parham; and (b) instructing the clerk of the court to vacate the Clerk's Default as to Bronzell D. Parham. In support of the Motion, the Plaintiff states as follows:

1. This adversary proceeding was commenced by the filing of the Complaint ("Complaint") on June 7, 2021 [Adv. ECF # 1].
2. On June 25, 2021 the Court issued its Summons (the "Initial Summons") and Order Setting Status Conference and Establishing Procedures and Deadline [Adv. ECF ## 2 and 3].

3. Given the nature of the Plaintiff's business, the number of defendants named in this adversary proceeding is voluminous. Indeed, the number of defendants surpasses 1,000.

4. On June 30, 2021, the Plaintiff mailed a package to each of the Alias Defendants, containing the Complaint, a Summons, and the Order Setting Status Conference and Establishing Procedures and Deadline, via First Class U.S. Mail. The Plaintiff certified mailing of the above in its certificate of service [Adv. ECF # 7].

5. On October 19, 2021, the Clerk of the Court entered a Default against Bronzell D. Parham [ECF # 28].

6. Subsequently, on November 23, 2021, Plaintiff learned that service was not successful at the address at which Bronzell D. Parham was served. Upon further investigation, Plaintiff believes that an alternative address for the Defendant, Bronzell D. Parham has been identified.

7. Accordingly, Plaintiff will endeavor to serve Bronzell D. Parham at the newly identified address of: 845 Cox Avenue, Hyattsville, MD 20783.

8. Accordingly, the Plaintiff requests the Court instruct the Clerk of Court to issue alias summons for Bronzell D. Parham, so the Plaintiff may attempt to serve her as detailed above, as well as vacating the default entered solely as against her.

WHEREFORE, Plaintiff, by and through undersigned counsel, respectfully requests this Court enter an order (a) granting the Motion; (b) directing the Clerk of the Court to issue alias summons on Bronzell D. Parham ; (c) vacating the Clerk's Default as against Bronzell D. Parham; and (d) granting such further and other relief as the Court deems just and proper.

Dated: November 24, 2021

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By: _____ /s/
IDO J. ALEXANDER, ESQ.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on November 24, 2021 to all parties on the list to receive e-mail notice/service for this case, via the Notice of Electronic Filing (which is incorporated herein by reference).

By: _____ /s/
Ido J. Alexander