

IN THE CIRCUIT COURT, FOURTH  
JUDICIAL CIRCUIT, IN AND FOR  
DUVAL COUNTY, FLORIDA

CASE NO.: 2017-CA-771  
DIVISION: CV-H

The CITY OF JACKSONVILLE, a  
municipal corporation,

Plaintiff,

vs.

COWEALTH LLC, a Florida limited  
liability company, and BASIC PRODUCTS  
LLC, a Florida limited liability company,

Defendants.

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**MOTION TO STRIKE ANSWER**

Plaintiff, the CITY OF JACKSONVILLE (the “City”), moves to strike the Answer filed on March 7, 2017, by JoAnn M. Brown on behalf of Defendants, COWEALTH LLC and BASIC PRODUCTS LLC (collectively, “Defendants”). Mrs. Brown is a managing member of each Defendant, as well as Defendants’ registered agent; however, according to Florida Bar records, she is not an attorney. Mrs. Brown’s representation of Defendants in this litigation is impermissible because it is the unlicensed practice of law. Therefore, the Answer should be stricken and Defendants should be allowed an opportunity to retain counsel. See Colby Materials, Inc. v. Caldwell Constr., Inc., 926 So. 2d 1181, 1183–84 (Fla. 2006) (citing Torrey v. Leesburg Reg’l Med. Ctr., 769 So. 2d 1040 (Fla. 2000)).

WHEREFORE, the City requests that the Court enter an order striking the Answer filed by JoAnn M. Brown on behalf of Defendants and granting Defendants fifteen (15) days to obtain counsel, or granting such other relief as the Court finds appropriate.

DATED this 9th day of March, 2017.

**OFFICE OF GENERAL COUNSEL**

*/s/ Jacob J. Payne*  
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*Counsel for the City*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 9th day of March, 2017, a true and correct copy of the foregoing was filed with the Clerk of Court via the Florida Courts e-Filing Portal and to the following by U.S. Mail:

CoWealth LLC  
c/o Joann Brown  
5638 Commonwealth Avenue  
Jacksonville, FL 32254

Basic Products, LLC  
c/o Joann Brown  
5638 Commonwealth Avenue  
Jacksonville, FL 32254

*/s/ Jacob J. Payne*  
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Jacob J. Payne  
Assistant General Counsel