

Form 1.997

Civil Cover Sheet

The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of reporting judicial workload data pursuant to Florida Statute 21.075.

I. CASE STYLE

Circuit Court

08-16475 FC 16

CYNTHIA A. RODRIGUEZ
Petitioner-Wife,

Case No. _____

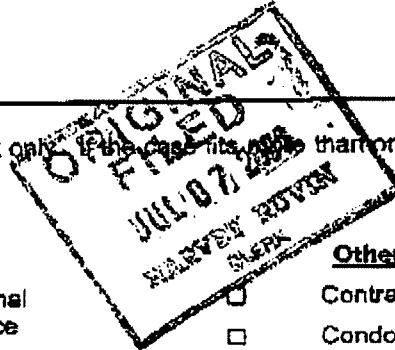
vs.

Judge: _____

ALEXANDER E. RODRIGUEZ,
Respondent-Husband.

II. TYPE OF CASE

(place a check mark in one box only if the case fits more than one type of case, select the most definitive.)



Domestic Relations

- Simplified dissolution
- Dissolution
- Support - IV-D
- Support - Non IV-D
- URESA - IV-D
- URESA - Non IV-D
- Domestic violence
- Other domestic relations

Torts

- Professional malpractice
- Products liability
- Auto negligence
- Other negligence

Other Civil

- Contracts
- Condominium
- Real property/mortgage foreclosure
- Eminent domain
- Other

III. IS JURY TRIAL DEMANDED IN COMPLAINT?

- Yes
- No

DATE: July 7, 2007

SIGNATURE OF ATTORNEYS FOR PARTY INITIATING ACTION:

Maurice Jay Kutner
MAURICE JAY KUTNER

Earle S. Lilly
EARLE S. LILLY

LAW OFFICES OF KUTNER AND ASSOCIATES

11TH FLOOR, COURTHOUSE TOWER, 44 WEST FLAGLER STREET, MIAMI, FLORIDA 33130-1808 • TELEPHONE (305) 377-2011

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

FAMILY DIVISION

CASE NO.

07-1097876-10

IN RE: THE MARRIAGE OF

CYNTHIA A. RODRIGUEZ,

Petitioner-Wife,

and

ALEXANDER E. RODRIGUEZ,

Respondent-Husband.

ORIGINAL
FILED
JUL 07 2008
MOTION TO APPEAR
PRO HAC VICE

Attorneys Earle S. Lilly and John E. Van Ness respectfully request the Court to permit them to appear in this cause, as counsel for the Petitioner-Wife, on a pro hac vice basis and state:

1. Attorneys Earle S. Lilly and John E. Van Ness are members in good standing of the State Bar of Texas, have never been disbarred, and neither is the subject of any grievance proceeding.

2. Attorneys Earle S. Lilly and John E. Van Ness agree to be bound by the Rules of the Florida Bar and the Local Rules of this Court; and, that all papers filed in this cause will be signed by a lawyer licensed by the Florida Bar.

WHEREFORE, it is requested that this motion be granted.

07/06/2008 SUN 22:40 FAX 954 (22 6652 tms_mi_aaa2

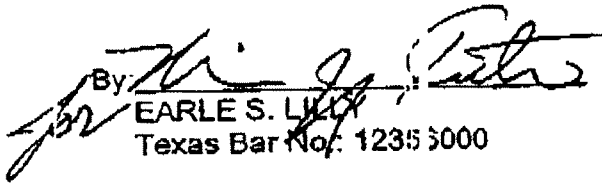
[Rodriguez vs. Rodriguez, Motion to Appear Pro Hac Vice]

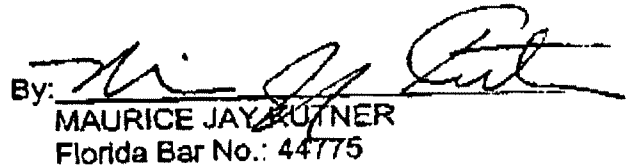
CERTIFICATE OF SERVICE

WE CERTIFY that a copy of the Motion to Appear Pro Hac Vice will be served on the Respondent with the initial service of process.

LILLY LAW OFFICE
4544 Post Oak Place - Suite 380
Houston, Texas 77027
Phone: (713) 966-4444
Fax: (713) 966-4466

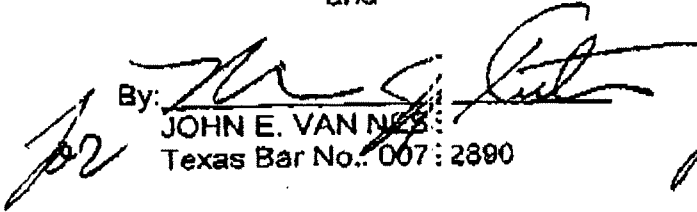
KUTNER AND ASSOCIATES
11th Floor - Courthouse Tower
44 West Flagler Street
Miami, Florida 33130-1808
Phone: (305) 377-9411
Fax: (305) 377-4758

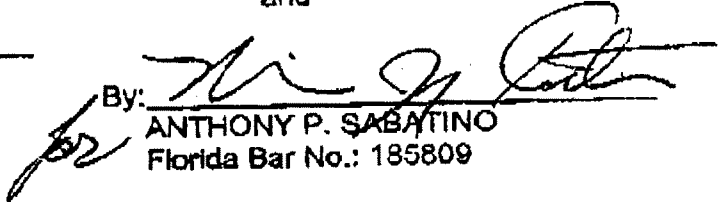
By: 
EARLE S. LILLY
Texas Bar No.: 12353000

By: 
MAURICE JAY KUTNER
Florida Bar No.: 44775

and

and

By: 
JOHN E. VAN NESS
Texas Bar No.: 0072890

By: 
ANTHONY P. SABATINO
Florida Bar No.: 185809

and

[Rodriguez v. Rodriguez, Petition for Dissolution of Marriage]

Sunrise Avenue, Coral Gables, Florida 33133. The Wife is entitled to receive, the marital home and contents, as lump sum alimony and partial equitable distribution.

13. **EXCLUSIVE POSSESSION:** The Wife is entitled to continuing temporary and permanent exclusive possession of the marital residence, to provide a home for herself and the minor children.

14. **EQUITABLE DISTRIBUTION:** The Wife claims and is entitled to an equitable distribution of all assets acquired during the marriage, pursuant to Section 61.075, Florida Statutes.

15. **AUTOMOBILE FOR THE WIFE:** The Wife needs and is entitled to possession and title to the automobile she is presently driving.

16. **PERSONAL PROPERTY:** The Wife is in need of and entitled to exclusive possession of and title to the real and personal property now in her possession. This includes the personal property contained in the marital residence.

17. **LIFE AND MEDICAL INSURANCE:** The Husband has and is maintaining life and medical insurance for the benefit of the Wife and minor children. He should be required to continue to maintain that or comparable insurance.

18. **DEBTS:** The parties have incurred certain debts, which the Husband should be required to discharge.

19. **ATTORNEYS' FEES, SUIT MONIES, AND COSTS:** The Wife has obligated herself to pay reasonable attorneys' fees, suit monies, and costs to her attorneys and other professionals in this action and asks for a judgment against the Husband for a sum considered to be a reasonable fee for those services, based upon her need and his ability to pay.