APPENDIX

In the Supreme Court of the United States

No. 25A442

Palanikumar Gnanam, et al., Petitioner(S)

v.

Nathaniel Chibuzor Keita, et al., Respondent(S)

On Petition For A Writ Of Certiorari To The District Court Of Appeal Of Florida, Fifth District

APPENDIX FOR PETITION FOR WRIT OF CERTIORARI

Pro se Petitioners/Appellants/Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, under the protection of US Supreme Court precedent for Pro Se litigants[1] entitling them to liberal construction, file this appendix, titled "APPENDIX FOR PETITION FOR WRIT OF CERTIORARI".

[1] "The U.S. Supreme Court has established that filings by pro se litigants are to be held to less stringent standards in recognition of the unique challenges they face in navigating legal procedures without professional assistance, *Haines v. Kerner*, 404 U.S. 519 (1972). In *Erickson v. Pardus*, 551 U.S. 89 (2007), the Court further emphasized that pro se pleadings are to be liberally construed to provide access to justice. Consistent with these principles, courts have a responsibility to ensure that pro se litigants are not prejudiced by their lack of formal legal training and to allow reasonable leniency in procedural requirements to prevent unjust outcomes due to technical legal errors."

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CONSTITUTIONAL PROVISIONS AND STATUTES INVOLVED

A. U.S. CONST. ART. VI, CL. 2 (SUPREMACY CLAUSE)

"This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding."

B. U.S. CONST. AMEND. XIV, § 1 (DUE PROCESS CLAUSE)

"No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law..."

C. 11 U.S.C. § 362(a) (AUTOMATIC STAY)

This section imposes the immediate and automatic injunction (the "automatic stay") on most collection actions against the debtor and the property of the estate the moment a bankruptcy case is filed.

(a) Except as provided in subsection (b) of this section, a petition filed under section 301, 302, or 303 of this title, or an application filed under section 5(a)(3) of the Securities Investor Protection Act of 1970, operates as a stay, applicable to all entities, of—
(1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced

before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title.

(2) the enforcement, against the debtor or against property of the estate, of a judgment obtained before the commencement of the case under this title.

(3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.

(4) any act to create, perfect, or enforce any lien against property of the estate.

(5) any act to create, perfect, or enforce against property of the debtor any lien to the extent that such lien secures a claim that arose before the commencement of the case under this title.

(6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title.

(7) the setoff of any debt owing to the debtor that arose before the commencement of the case under this title against any claim against the debtor.

(8) the commencement or continuation of a proceeding before the United States Tax Court concerning the debtor.

D. 11 U.S.C. § 524(a) (DISCHARGE EFFECT)

This section defines the effect of the entry of a discharge order, which occurs after the bankruptcy case is completed. It voids personal judgments and creates a permanent injunction.

(a) A discharge in a case under this title—

(1) voids any judgment at any time obtained, to the extent that such judgment is a determination of the personal liability of the debtor with respect to any debt discharged under section 727, 944, 1141, 1192,

1228, or 1328 of this title, whether or not discharge of such debt is waived.
(2) operates as an injunction against the commencement or continuation of an action, the employment of process, or an act, to collect, recover or offset any such debt as a personal liability of the debtor, whether or not discharge of such debt is waived.
(3) operates as an injunction against the commencement or continuation of an action, the employment of process, or an act, to collect or recover from, or offset against, property of the debtor of the kind specified in section 522(c) (which is exempt from liability for a debt) that is acquired after the commencement of the case, on account of any allowable claim to the extent that it is a community claim that is excepted from discharge under paragraph (4) or (8) of section 523(a), or that is a community claim that was discharged under section 944, 1141, 1192, 1228, or 1328 of this title, or that was either not discharged or denied discharge under section 1141(d), 1228(a), 1228(b), or 1328(a) of this title. ...

E. 11 U.S.C. § 541. Property of the estate

(a) The commencement of a case under section 301, 302, or 303 of this title creates an estate. Such estate is comprised of all the following property, wherever located and by whomever held:...

F. 11 U.S.C. § 554(d). Abandonment of property of the estate.

Unless the court orders otherwise, property of the estate that is not abandoned under this section and that is not administered in the case remains property of the estate.

G. Fla. Stat. § 77.041 (Not in Appendix):

CONSTITUTIONAL PROVISIONS AND STATUTES INVOLVED

APPENDIX A – Florida Supreme Court Order

Supreme Court of Florida

MONDAY, AUGUST 18, 2025

Palanikumar Gnanam, et al.,
Petitioner(s)
v.
Nathaniel Chibuzor Keita, et al.,
Respondent(s)
SC2025-0657
Lower Tribunal No(s).: 5D2024-2417;
162024CC000687AXXXMA

This cause having heretofore been submitted to the Court on jurisdictional briefs and portions of the record deemed necessary to reflect jurisdiction under Article V, Section 3(b), Florida Constitution, and the Court having determined that it should decline to accept jurisdiction, it is ordered that the petition for review is denied.

No motion for rehearing will be entertained by the Court. See Fla. R. App. P. 9.330(d)(2).

CANADY, LABARGA, COURIEL, FRANCIS, and SASSO, JJ., concur.

A True Copy

Test:
John A. Tomasino
Clerk, Supreme Court
[Seal of the Supreme Court of Florida]
SC2025-0657, 8/18/2025
KS

CASE NO.: SC2025-0657 Page Two

Served:

5DCA CLERK
DUVAL CLERK
MULLAIRANI GNANAM
PALANIKUMAR GNANAM
HON. SHAYLA EN'RIKA LEE
KYLE PETERS

APPENDIX A – Florida Supreme Court Order

APPENDIX B – 5DCA Per Curiam Affirmance

FIFTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA

Case No. 5D2024-2417
LT Case No. 2024-CC-000687

PALANIKUMAR V. GNANAM and
MULLAIRANI GNANAM,
Appellants,
v.
NATHANIEL CHIBUZOR KEITA and
LANA PAIGE TOMPKINS,
Appellees.

On appeal from the County Court for Duval County. James A. Ruth, Judge.

Palanikumar V. Gnanam, Jacksonville, pro se.

Mullairani Gnanam, Jacksonville, pro se.

Kyle Peters, of KP Law, PLLC, Jacksonville, for Appellees.

August 12, 2025

PER CURIAM.

AFFIRMED.

MAKAR, SOUD, and KILBANE, JJ., concur.

Not final until disposition of any timely and authorized motion under Fla. R. App. P. 9.330 or 9.331.

APPENDIX C – 5DCA Attorney Fees Order

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

FIFTH DISTRICT

Palanikumar V. Gnanam and
Mullairani Gnanam,
Appellant(s),
v.
Nathaniel Chibuzor Keita and
Lana Paige Tompkins,
Appellee(s).
Case No.: 5D2024-2417
L.T. No.: 2024-CC-000687
Date: August 12, 2025

BY ORDER OF THE COURT:

ORDERED that Appellees' Motion for Award of Attorneys' Fees and Costs, filed January 13, 2025, is granted and the above-styled cause is hereby remanded to the trial court, pursuant to Florida Rule of Appellate Procedure 9.400(b), to determine and assess reasonable attorneys' fees for this appeal.

I hereby certify that the foregoing is (a true copy of) the original Court order.

[File stamp: 5D2024-2417 8/12/2025]

s/ SANDRA B. WILLIAMS, CLERK

Panel: Judges Makar, Soud and Kilbane

cc: Duval Clerk;
Mullairani Gnanam;
Palanikumar V. Gnanam;
Kyle Peters

APPENDIX D – 5DCA Mandate

M A N D A T E

FROM

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

FIFTH DISTRICT

THIS CAUSE HAVING BEEN BROUGHT TO THIS COURT BY APPEAL OR BY PETITION, AND AFTER DUE CONSIDERATION THE COURT HAVING ISSUED ITS OPINION OR DECISION;

YOU ARE HEREBY COMMANDED THAT FURTHER PROCEEDINGS AS MAY BE REQUIRED BE HAD IN SAID CAUSE IN ACCORDANCE WITH THE RULING OF THIS COURT AND WITH THE RULES OF PROCEDURE AND LAWS OF THE STATE OF FLORIDA.

WITNESS THE HONORABLE HARVEY L. JAY, CHIEF JUDGE OF THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA, FIFTH DISTRICT, AND THE SEAL OF THE SAID COURT AT DAYTONA BEACH, FLORIDA ON THIS DAY.

DATE: September 5, 2025
FIFTH DCA CASE NO.: 5D2024-2417
CASE STYLE: Palanikumar V. Gnanam and Mullairani Gnanam v. Nathaniel Chibuzor Keita and Lana Paige Tompkins

COUNTY OF ORIGIN: Duval County
TRIAL COURT CASE NO.: 2024-CC-000687
I hereby certify that the foregoing is (a true copy of) the original Court mandate.

[File stamp: 5D2024-2417 9/5/2025]
s/ SANDRA B. WILLIAMS, CLERK
cc: Duval Clerk; Mullairani Gnanam; Palanikumar V. Gnanam; Kyle Peters

APPENDIX E – 5DCA Barring Order Chain

APPENDIX E-0 – 5DCA Order Barring Petitioners / Appellants from Further Filings

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Palanikumar V. Gnanam and
Mullairani Gnanam,
Appellant(s),
v.
Nathaniel Chibuzor Keita and Lana Paige Tompkins,
Appellee(s).
Case No.: 5D2024-2417
L.T. No.: 2024-CC-000687
Date: May 1, 2025

BY ORDER OF THE COURT:

Upon consideration of "Appellant Mrs. Gnanam's Response to Order to Show Cause Dated April 10, 2025," filed April 20, 2025, and "Appellant's Response to Order to Show Cause Dated April 10, 2025," filed April 20, 2025, and finding Appellants failed to show cause why sanctions should not be imposed, it is

ORDERED that Appellants Palanikumar Gnanam and Mullairani Gnanam are barred from further pro se filings, either together or separately, in this appeal. The Clerk of this Court is directed not to accept any further pro se filings from Appellants in case number 5D2024-2417. Accordingly, this appeal shall proceed to consideration on the merits without the benefit of a Reply Brief. No motion for rehearing,

clarification, certification, or written opinion will be entertained by this Court.

I hereby certify that the foregoing is (a true copy of) the original Court order.

[File stamp: 5D2024-2417 5/1/2025]
s/ SANDRA B. WILLIAMS, CLERK
Panel: Judges Wallis, Harris and Kilbane
cc:
Mullairani Gnanam; Palanikumar V. Gnanam; Kyle Peters

APPENDIX E – 5DCA Barring Order Chain

APPENDIX E-1 – 5DCA Panel Assignment Notice

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Palanikumar V. Gnanam and
Mullairani Gnanam,
Appellant(s),
v.
Nathaniel Chibuzor Keita and Lana Paige Tompkins,
Appellee(s).
CASE NO.: 5D2024-2417
LT CASE NO. 2024-CC-000687
DATE: June 9, 2025

BY ORDER OF THE COURT:

NOTICE OF PANEL ASSIGNMENT

This is to advise you that this cause has been assigned to the following panel of judges, listed in their order of seniority:

HONORABLE SCOTT MAKAR
HONORABLE ADRIAN G. SOUD
HONORABLE PAIGE KILBANE

Please be advised that the panel composition is subject to change at any time and without further notice.

I hereby certify that the foregoing is (a true copy of) the original Court order.

[File stamp: 5D2024-2417 6/9/2025]
s/ SANDRA B. WILLIAMS, CLERK
cc: Mullairani Gnanam; Palanikumar V. Gnanam; Kyle Peters

APPENDIX E-2 – Florida Supreme Court Order Transferring Emergency Motion to Stay

SUPREME COURT OF FLORIDA

FRIDAY, JUNE 13, 2025
Palanikumar Gnanam, et al.,
Petitioner(s)
v.
Nathaniel Chibuzor Keita, et al.,
Respondent(s)
SC2025-0657
Lower Tribunal No(s).: 5D2024-2417;
162024CC000687AXXXMA

Petitioner has filed an Emergency Motion to Stay Further Proceedings in the Fifth DCA or, in the Alternative, for Relinquishment of Jurisdiction with this Court. Upon review of the motion, and any response thereto, it appears that petitioner has failed to first file this motion with the lower tribunal as required by Florida Rule of Appellate Procedure 9.310. Accordingly, the motion, and any response thereto, is hereby forwarded to the Fifth District Court of Appeal for its consideration as a motion to withdraw mandate. This action should not be construed as a comment on the merits of the motion. The lower tribunal shall treat the motion as if it had been originally filed there on the date it was filed in this Court.

CANADY, LABARGA, COURIEL, FRANCIS, and SASSO, JJ., concur.

A True Copy

Test:

John A. Tomasino
Clerk, Supreme Court

[Seal of the Supreme Court of Florida]
SC2025-0657 6/13/2025
KS

Served:
5DCA CLERK; DUVAL CLERK; MULLAIRANI GNANAM; PALANIKUMAR GNANAM; HON. SHAYLA EN'RIKA LEE; KYLE PETERS

APPENDIX E – 5DCA Barring Order Chain

APPENDIX E-3 – 5DCA Order Denying Emergency Motion to Stay Further Proc.

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FIFTH DISTRICT

Palanikumar V. Gnanam and
Mullairani Gnanam,
Appellant(s),
v.
Nathaniel Chibuzor Keita and Lana Paige Tompkins,
Appellee(s).
Case No.: 5D2024-2417
L.T. No.: 2024-CC-000687
Date: June 25, 2025

BY ORDER OF THE COURT:

ORDERED that Appellants' "Emergency Motion to Stay Further Proceedings . . . ," transferred from the Florida Supreme Court, June 13, 2025, is denied. Appellants are reminded that this Court's May 1, 2025 Order remains in effect.

I hereby certify that the foregoing is (a true copy of) the original Court order.

[File stamp: 5D2024-2417 6/25/2025]
s/ SANDRA B. WILLIAMS, CLERK
Panel: Judges Makar, Soud and Kilbane
cc:
Mullairani Gnanam; Palanikumar V. Gnanam; Kyle Peters

APPENDIX F – Judge Ruth Trial Court Original Final Judgments

August 1 and August 29, 2024

Final Judgment After Non-Jury Trial (Doc #101/#102, OR Book 21148, Page 2453) and Final Judgment Awarding Attorneys' Fees and Costs (Doc #123/#128, OR Book 21181, Page 1202)

#	Event	Date	Disposition
1	Motion to Recuse (D#61), filed under Fla. R. Gen. Prac. & Jud. Admin. **2.330, Disqualification of Trial Judges**	Filed June 27, 2024	**Never ruled on. Deemed granted by operation of law July 27, 2024 under Rule 2.330(l).**
2	Order Denying Defendant's Motion for Recusal and Disqualification (D#83)	Signed July 30, 2024	Denied only D#74, filed July 28, 2024; D#61 was not addressed. Signed the morning of trial; trial held that afternoon. Entered July 31, 2024.
3	Final Judgment After Non-Jury Trial (D#101) — $7,632.31	Signed Aug. 1, 2024	Entered Aug. 1, 2024.
4	Order Denying Defendants'	Signed Aug. 1, 2024	Entered Aug. 1, 2024.

#	Event	Date	Disposition
	Seven (7) Pending Motions		
5	Final Judgment Awarding Attorneys' Fees and Costs (D#123) — $24,973.51	Signed Aug. 14, 2024	Entered Aug. 29, 2024 — fifteen days after signature.
6	Renewed and Amended Motion to Recuse and Disqualify (D#159)	Filed Nov. 20, 2024	**Never ruled on. Deemed granted by operation of law Dec. 20, 2024.** Judge Ruth retired Jan. 7, 2025 without entering any order after D#159 was filed.

1. The motion to disqualify filed June 27, 2024 (D#61) was never ruled on. Under Fla. R. Gen. Prac. & Jud. Admin. 2.330(l), it was deemed granted on July 27, 2024 by operation of law.
2. The order at Appendix F-0 denies a later motion, D#74, filed July 28, 2024. It does not address D#61.
3. Appendix F-0 was signed on the morning of July 30, 2024 and entered July 31, 2024. The trial was held on the afternoon of July 30, 2024.
4. The Final Judgment at Appendix F-1 was signed and entered on August 1, 2024, five days after July 27, 2024.

APPENDIX F – Judge Ruth Trial Court Original Final Judgments

5. The order at Appendix F-2 disposes of seven motions in one operative line. No motion is separately addressed, and no finding is stated.

6. A second motion to disqualify, filed November 20, 2024 (D#159), was never ruled on and was deemed granted December 20, 2024. Judge Ruth retired January 7, 2025 without entering any order after D#159.

APPENDIX F-0 – Order Denying Motion for Recusal and Disqualification

Filing # 203629547 E-Filed 07/30/2024 10:21:27 AM

IN THE COUNTY COURT,
FOURTH JUDICIAL CIRCUIT,
IN AND FOR DUVAL COUNTY, FLORIDA.
CASE NO: 16-2024-CC-000687
DIVISION: F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
vs.
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM,
Defendants
_____/

ORDER DENYING DEFENDANT'S MOTION FOR RECUSAL AND DISQUALIFICATION

This cause coming to be heard upon Defendant's, Palanikumar V. Gnanam, Motion To Recuse and Disqualify. The Motion was sent by email from the

defendant and filed on July 29, 2024. After due consideration and the Court being fully advised of the premises, the Court finds:

1. The Court thoroughly reviewed the allegations therein.

2. The Court finds the Motion was procedurally and legally insufficient

3. Therefore, the Defendant's Motion to Recuse and Disqualify is hereby denied.

DONE AND ORDERED this Tuesday, July 30, 2024 in Chambers, at Jacksonville, Duval County, Florida.

16-2024-CC-000687-AXXX-MA 07/30/2024
10:19:39 AM
/s/ James A. Ruth
James A. Ruth, County Judge
James Ruth, Judge

ACCEPTED: DUVAL COUNTY, JODY PHILLIPS, CLERK, 07/31/2024 07:37:31 AM

[Petitioners' note: Service list omitted.]

APPENDIX F-1 – Final Judgment After Non-Jury Trial

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

NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, Plaintiffs,
vs.

PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, Defendants.
CASE NO.: 2024-CC-000687
_____/

FINAL JUDGMENT AFTER NON-JURY TRIAL

THIS CAUSE came before the Court for a trial on the merits on July 30, 2024, on Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins' First Amended Complaint against Defendants, Palanikumar V. Gnanam and Mullairani Gnanam. The Court, having heard the testimony of the witnesses, reviewed the evidence presented, and being otherwise fully advised in the premises, finds as follows:

Findings of Fact:

1. The Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins, entered into a lease agreement (the "Lease") with Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, for the property located at 8100 Summer Gate Ct, Jacksonville, FL 32256 (the "Property").

2. The Plaintiffs paid a security deposit of $1,500.00 and the first month's rent of $1,500.00 before taking possession of the Property. They also paid the Defendants a $50.00 application fee and $30 for keys. They also paid $35 to Zillow for a tenant application fee.

3. Upon taking possession, the Plaintiffs discovered multiple issues with the Property, including but not limited to a malfunctioning air conditioning system, foul odors, and mold infestation.

4. Despite notifying the Defendants of these issues, the Defendants failed or refused to properly remediate the conditions, rendering the Property uninhabitable and unsafe for residential use.

5. The Plaintiffs were forced to vacate the Property and seek alternative accommodations due to the Defendants' failure to address the hazardous conditions.

6. The Defendants unilaterally terminated the Lease, and sent notice of the same to the Plaintiffs due to the mold issues and the Plaintiffs having a "sickly child" allergic to mold. The Defendants also claimed that they were terminating because the Plaintiffs purportedly lied in the rental application and refused to perform their obligations under the Lease.

7. This Court found no evidence of fraud or misrepresentation by the Plaintiffs in their rental applications. This Court specifically finds that the Plaintiffs fully performed their obligations under the Lease, despite the Defendants failures to fulfill their obligations.

8. Facing the threat of eviction and having received the notice of termination from the Defendants, the Plaintiffs surrendered possession, returned the keys and completely vacated all their belongings from the Property on December 15, 2024 [Petitioners' note: The judgment reads "December 15, 2024." This is incorrect and should be December 15, 2023 as the case on this matter was filed on January 8, 2024 and the trial was on July 30, 2024]

9. The Defendants incurred additional expenses of $449.00 for a mold assessment, $204.00 for moving

costs and $64.31 for a Uhaul charge to move out their belongings.

10. The Plaintiffs moved to another townhome in the neighborhood that was two doors down from the Property and rented that property for $1,650.00 per month for a 1-year lease, which is $150 per month more than the rent under the Lease.

11. The Defendants retained the security deposit and rent payments, and failed to comply with statutory requirements under the Florida Residential Landlord and Tenant Act.

12. On January 12, 2024, the Defendants wrongfully sent a notice to the Plaintiffs claiming the entire security deposit, and wrongfully demanded that the Plaintiffs pay charges they did not agree to in the Lease or otherwise disclosed in advance, and charged the Plaintiffs for maintenance costs that were the responsibility of the landlord in the Lease and pursuant to Florida law. The Defendants knew that they did not have the right to charge for said charges in the notice.

13. Subsequently, the Defendants attempted to directly communicate with the Plaintiffs and settle the purported dispute by sending settlement payments directly to the Plaintiffs while fully aware that the Plaintiffs were represented by an attorney. They were also aware that the Plaintiffs, through counsel, had rejected their settlement offer and that they were instructed not to directly contact the Plaintiffs.

Conclusions of Law

14. The Defendants breached the Lease by failing to maintain the Property in a habitable condition and by failing to comply with their statutory duties under Florida law.

15. The Defendants' actions and omissions constitute negligence, breach of statutory duties, and constructive eviction.

16. The Defendants wrongfully withheld the Plaintiffs' security deposit and rent payments in violation of Florida Statute § 83.49.

17. The Defendants' actions violated the Florida Consumer Collection Practices Act (FCCPA).

It is hereby ORDERED AND ADJUDGED:

1. Final Judgement is hereby entered in favor of the Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins, whose address is 8104 Summer Gate Ct, Jacksonville, FL 32256, and against Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, whose address is 10597 Creston Glen Cir E, Jacksonville, FL 32256, in the amount of $3,000.00, representing the rent and security deposit paid by Plaintiffs, $50.00 application fee, $30 for keys, $35 for the Zillow application, $449.00 for a mold assessment, $204.00 for moving costs and $64.31 for the Uhaul costs, $2,000.00 for the statutory damages due under the FCCPA, and the difference between the rent due in the Lease and the rent for the additional 1 year lease which is $1,800.00 ($150.00 x 12 months), for a total sum of $7,632.31, plus interest at the rate that shall be adjusted to reflect the statutory rate of interest in accordance with Fla. Stat. § 55.03 for each year thereafter, for which let execution issue forthwith.
2. Defendants shall pay Plaintiffs' reasonable attorney's fees and costs incurred in pursuing this action. The Court reserves jurisdiction to determine

the amount of attorney's fees and costs to be awarded to Plaintiffs.

3. Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the Plaintiff's counsel within forty-five (45) days from the date of this Final Judgment, unless this Final Judgment is satisfied or post-judgment discovery is stayed.
4. The Court retains jurisdiction to enforce this Final Judgment and to enter further orders that are proper to compel the Defendants to complete Form 1.988, including all required attachments, and serve it on Plaintiff's counsel.

DONE AND ORDERED in Jacksonville, Duval County, Florida on August 1, 2024.

Signature of James A. Ruth, County Court Judge

APPENDIX F-2 – Order Denying Defendants' 7 Pending Motions on Trial Day

ORDER DENYING DEFENDANTS' PENDING MOTIONS TO DISMISS, FOR SUMMARY JUDGMENT, MOTION FOR CONTINUANCE, RECONSIDERATION OF MOTION TO DISMISS, RECONSIDERATION OF AMENDED MOTION FOR CONTINUANCE, AND MOTION FOR CLARIFICATION OF ORDER DENYING MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS

THIS CAUSE having come before the Court on Defendants' various Motions pending as of July 30, 2024, including:

- Amended Motion to Dismiss for Fraud - Filed on July 20, 2024;
- Motion for Summary Judgment Based on Breach of Contract - Filed on July 21, 2024, Motion for Summary Judgment Based on Conflict of Interest - Filed on July 22, 2024,
- Defendants' Amended Motion for Continuance - Filed on July 24, 2024,
- Motion for Reconsideration of Denial of Motion to Dismiss for No Evidence - Filed on July 28, 2024;
- Motion for Reconsideration for Defendants' Amended Motion for Continuance - Filed on July 29, 2024.
- Motion for Clarification of Order Denying Motion to Dismiss for Insufficient Service of Process - Filed on July 29, 2024.

(collectively, the "Defendants' Motions"), it is hereby ORDERED AND ADJUDGED:

1. The Defendants' Motions are hereby DENIED.

DONE AND ORDERED in Jacksonville, Duval County, Florida on August 1, 2024.

Signature of James A. Ruth, County Court Judge

APPENDIX F-3 – Final Judgment Awarding Attorneys' Fees

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

APPENDIX F – Judge Ruth Trial Court Original Final Judgments

NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, Plaintiffs,
vs.
PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, Defendants.
CASE NO.: 2024-CC-000687
_____/

FINAL JUDGMENT AWARDING ATTORNEYS' FEES AND COSTS

THIS CAUSE came before the Court upon Plaintiff's Motion for Award of Attorneys' Fees and Costs. The Court, having considered the motion, the evidence presented, and being otherwise fully advised in the premises, finds that the motion is well-taken and is hereby GRANTED.

The Court makes the following findings:

1. On August 1, 2024, this Court entered a Final Judgment After Non-Jury Trial in favor of Plaintiffs, NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, against the Defendants, PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, awarding Plaintiff a total of $7,632.31.
2. Pursuant to the lease at issue in this action, Florida Statute § 57.105(7), Florida Statute §83.48 and Florida Statute §83.49, Plaintiffs are entitled to an award of reasonable attorneys' fees and costs, as well as § 57.041, Fla. Stat., and Rule 1.525 of the Florida Rules of Civil Procedure, as the prevailing party.

IT IS THEREFORE ORDERED AND ADJUDGED that:

A. The Plaintiffs are awarded attorneys' fees in the amount of $16,462.50 and the following expenses: Filing fee and summons issuance $320.85; Alias summons fees $20.70; Service of process $110.00; Certified mail fees $7.49; UPS Shipping Costs $36.54; Expert Attorney for Affidavit of Reasonableness $350.00; Certified copy fees for certified judgment $7.00; Recording fees recording certified judgment $44.00; Total costs $878.70.

B. The Final Judgment amount of $7,632.31, previously awarded to Plaintiffs, is hereby confirmed.

C. Therefore, the Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins, whose address is 8104 Summer Gate Ct, Jacksonville, FL 32256, shall have and recover from Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, whose address is 10597 Creston Glen Cir E, Jacksonville, FL 32256, and whose last four of his social security number is unknown at this time, the total sum of $24,973.51 plus interest at the statutory rate of interest in accordance with Fla. Stat. § 55.03, for which let execution issue forthwith.

D. Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the Plaintiffs' counsel within forty-five (45) days from the date of this Final Judgment, unless this Final Judgment is satisfied or post-judgment discovery is stayed.

E. The Court retains jurisdiction to enforce this Final Judgment and to enter further orders that are proper to compel the Defendants to complete

Form 1.977, including all required attachments, and serve it on Plaintiffs' counsel.

F. The Court retains jurisdiction of this matter for purposes of enforcement of this Final Judgment.

DONE AND ORDERED in Jacksonville, Duval County, Florida on August 14, 2024.

Signature of James A. Ruth, County Court Judge

[Source: Doc #101/#102 (OR Book 21148, Page 2453–2457, recorded 08/02/2024) and Doc #123/#128 (OR Book 21181, Page 1202–1204, recorded 09/03/2024), Duval County Clerk of Court, Case No. 2024-CC-000687.]

APPENDIX F – Judge Ruth Trial Court Original Final Judgments

APPENDIX G – Judge Lee Dec 4th, 2025 Final Judgments

October 17, 2025 through March 4, 2026

#	Event	Date	Disposition
1	Hearing on Defendants' motions. The Court states on the record: *"The only thing that you have proven to the court is that Mr. Keita made contradictory statements and [between] the trial court and bankruptcy court."* *"What it says to me is that he told the bankruptcy court something different."*	Oct. 17, 2025	Transcript reproduced at Appendix T-1, page 51, lines 15–25. No finding entered. The Court required proof that Plaintiff "actually lied to you, not to a bankruptcy court."
2	Final Judgment of Garnishment (G-1) — $25,239.49; Garnishee Wells Fargo Bank, N.A. directed to remit	Signed Dec. 4, 2025, 10:45:33 a.m.	E-filed Dec. 4, 2025, 10:54:17 a.m. Recorded Dec. 8, 2025, OR Book 21715, pp. 1850–1854. Clause E orders accounts 0195 and 4079 and safe deposit boxes 0041 and 0051 immediately

#	Event	Date	Disposition
			released and not awarded to Plaintiffs or Garnishee.
3	Final Judgment Awarding Appellate Attorneys' Fees and Costs (G-2) — $10,862.50; total principal $35,836.01	Dec. 4, 2025	E-filed Dec. 4, 2025, 10:56:12 a.m. Recites the same October 17, 2025 hearing.
4	Verified Motion to Disqualify Judge Shayla E. Lee, filed under Fla. R. Gen. Prac. & Jud. Admin. 2.330, Disqualification of Trial Judges	Filed Jan. 27, 2026	No order addressing the motion appears on the docket. Deemed granted by operation of law Feb. 27, 2026 under Rule 2.330(l).
5	Following disqualification, after inducement letter from Mr. Kyle Peters outside the Court Portal, six orders were entered, four of which were designated nunc pro tunc	Mar. 4, 2026	Reproduced at Appendix P-1 through P-6. The Order of Recusal was entered last.

1. The Final Judgment of Garnishment at Appendix G-1, Clause E, orders accounts 0195 and 4079

and safe deposit boxes 0041 and 0051 immediately released, and not awarded to Plaintiffs or to the Garnishee.

2. Appendix G-1 and Appendix G-2 were e-filed two minutes apart on December 4, 2025, at 10:54:17 a.m. and 10:56:12 a.m. Both recite the same October 17, 2025 hearing.

3. At that hearing the Court stated that what had been proven was that Plaintiff Keita made contradictory statements between the trial court and the bankruptcy court. No finding was entered. Reproduced at Appendix T-1.

4. The verified motion to disqualify filed January 27, 2026 was never ruled on and was deemed granted February 27, 2026.

5. Six orders were entered March 4, 2026, five days after that date. Reproduced at Appendix P-1 through P-6.

APPENDIX G-1–Final Judgment of Garnishment

Doc # 2025280046, OR BK 21715 Page 1850, Number Pages: 5, Recorded 12/08/2025 04:27 PM, JODY PHILLIPS CLERK CIRCUIT COURT DUVAL COUNTY
Filing # 237008820 E-Filed 12/04/2025 10:54:17 AM

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

NATHANIEL CHIBUZOR KEITA and

LANA PAIGE TOMPKINS,
Plaintiffs, CASE NO.: 2024-CC-000687
vs.
PALANIKUMAR V. GNANAM and
MULLAIRANI GNANAM,
Defendants.
and
WELLS FARGO BANK, N.A.,
Garnishee.
_____/

FINAL JUDGMENT OF GARNISHMENT

THIS CAUSE came before the Court at a hearing held on October 17, 2025, upon Plaintiffs', NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, motion pursuant to Section 77.07(2), Florida Statutes for default final judgment of garnishment (doc #163) and Motion to Lift Stay and Renewed Motion for Final Judgment of Garnishment (doc #182). The Plaintiffs appeared at the hearing through counsel. Both Defendants appeared at the hearing individually. The Garnishee appeared through counsel. The Court, having considered the motion, and being otherwise fully advised in the premises, finds that the motion is hereby GRANTED.

The Court makes the following findings:

1. On August 1, 2024, and subsequently, on August 29, 2024, the Plaintiffs recovered a judgment against the Defendants in the above-entitled action in the amount of $24,973.51. This debt is wholly unsatisfied. Post-judgment interest has

accrued and will continue to accrue until the judgment is paid in full.

2. The Defendants appealed the judgments in this action and the judgements were subsequently affirmed by the Fifth District Court of Appeals.

3. This Court entered an order staying this action until completion of the appeal. An order lifting the stay will be entered by separate order of this Court.

4. Garnishee WELLS FARGO BANK, N.A. is a bank with a branch located in Florida. Garnishee was served with a Writ of Garnishment and Defendants were timely served with copies of Plaintiffs Motion For Writ of Garnishment, the Writ of Garnishment issued by the Clerk of Court, and a Notice to Defendant with garnishment exemptions and explanations.

5. Garnishee filed an Answer to the Writ of Garnishment on November 26, 2024, acknowledging that it possessed funds of Defendants in certain bank accounts identified in the Answer.

6. On November 28, 2024, less than five business days from service of the Answer, Plaintiffs served Defendants with a copy of Garnishee's Answer as required.

7. In accordance with section 77.055, Florida Statutes, on November 28, 2024, Plaintiff served Defendants by first class mail and email with a copy of Garnishee's Answer and the required notice.

8. Under section 77.07(2), Florida Statutes, Defendants were required to serve a motion to dissolve the writ within twenty (20) days after the

date indicated on the certificate of service filed by Plaintiffs. This would have been December 18, 2024. No objection, request for hearing, claim of exemption, or motion to dissolve has been filed by Defendants or any other parties by that time.

9. Based on Garnishee's Answer, the Garnishee is indebted to Defendant, PALANIKUMAR V. GNANAM in the sum of $27,892.11 from account number xxxx-xx-3751.

10. Based on Garnishee's Answer, the Garnishee is indebted to non-party, Guhan Gnanam and Defendant, PALANIKUMAR V. GNANAM in the sum of $4,877.24 from account number xxxx-xx-0195.

11. Based on Garnishee's Answer, the Garnishee is indebted to Defendants, PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM in the sum of $525.36 from account xxxx-xx-4079.

12. Based on Garnishee's Answer, the Garnishee is indebted to Defendants with two safe deposit boxes with account numbers xxxx-xx-0041 and xxxx-xx-0051.

13. The Plaintiffs incurred recoverable costs relating to the garnishment of:

A. Service of Process $78.00
B. Issuance of Writ of Garnishment $87.98
C. Garnishee attorney's fees: $100
Total Costs: $265.98

IT IS THEREFORE ORDERED AND ADJUDGED that:

A. Plaintiffs shall recover costs in the amount of $265.98 from Defendants.

B. Plaintiffs shall have and recover from Defendants and Garnishee the judgment amount in the sum of $24,973.51, plus costs in the amount of $265.98, for a total sum of $25,239.49 from account number xxxx-xx-3751 in the name of Palanikumar V. Gnanam.

C. The Garnishee, Wells Fargo Bank, N.A., is hereby directed to remit $25,239.49 from the funds or property of the Defendants held by the Garnishee to counsel for Plaintiffs. Payment shall be made payable to Plaintiffs' counsel KP Law, PLLC.

D. Upon receipt of payment, the Plaintiffs shall furnish the Garnishee with a Satisfaction of Judgment in Garnishment when this judgment is paid in full.

E. The funds in account numbers xxxx-xx-0195 and xxxx-xx-4079, and safe deposit boxes with account numbers xxxx-xx-0041 and xxxx-xx-0051 shall be immediately released and made available to those account holders and are not awarded to Plaintiffs or Garnishee.

F. The Garnishee is not liable for any interest or costs to the Defendants any funds or personal property retained due to this garnishment action.

G. The Court retains jurisdiction of this matter for purposes of enforcement of this Final Judgment.

DONE AND ORDERED in Jacksonville, Duval County, Florida on Thursday, December 4, 2025.

16-2024-CC-000687-AXXX-MA
12/04/2025 10:45:33 AM
/s/ Shayla Lee

SHAYLA LEE, COUNTY JUDGE
Shayla Lee, Judge

ACCEPTED: DUVAL COUNTY, JODY PHILLIPS, CLERK, 12/05/2025 01:04:21 PM

[Petitioners' note: Service list omitted.]

APPENDIX G-2–Final Judgment Awarding Fees

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

NATHANIEL CHIBUZOR KEITA and
LANA PAIGE TOMPKINS,
Plaintiffs, CASE NO.: 2024-CC-000687
vs.
PALANIKUMAR V. GNANAM and
MULLAIRANI GNANAM,
Defendants.

FINAL JUDGMENT AWARDING PLAINTIFFS'/APPELLEES' MOTION FOR AWARD OF APPELLEE ATTORNEYS' FEES AND COSTS

THIS CAUSE came before the Court for hearing on October 17, 2025 on Plaintiffs' Motion for Plaintiffs'/Appellees' Motion for Award of Appellee Attorneys' Fees and Costs (doc #185), pursuant to the Order of the Fifth District Court of Appeal dated August 12, 2025. The Plaintiffs appeared at the hearing through counsel. Both Defendants appeared at the

hearing individually. The Court, having reviewed the Motion, the record, and being otherwise fully advised in the premises, finds that appellate proceedings have concluded, the mandate has issued, and the stay of enforcement previously entered on February 6, 2025, is no longer warranted. Accordingly, it is hereby GRANTED.

The Court makes the following findings:

1. On August 1, 2024, this Court entered a Final Judgment After Non-Jury Trial in favor of Plaintiffs, awarding damages in the amount of $7,632.31, with statutory interest accruing from that date.

2. On August 29, 2024, this Court entered a Final Judgment awarding Plaintiffs $16,462.50 in attorneys' fees and $878.70 in costs, with statutory interest accruing from that date.

3. On August 12, 2025, the Fifth District Court of Appeal affirmed the judgment and entered an Order granting Appellees' Motion for Attorneys' Fees and Costs and remanded to this Court to determine and assess the amount.

4. The Court has considered the hours reasonably expended and reasonable hourly rate, and determines the reasonable attorneys' fees incurred by Plaintiffs in prosecuting this action on appeal are $10,862.50.

IT IS THEREFORE ORDERED AND ADJUDGED that:

A. The Plaintiffs are awarded appellate attorneys' fees in the amount of $10,862.50.

B. Plaintiffs, NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, whose address is 4500 Baymeadows Rd, Jacksonville FL, 32217, shall have and recover from Defendants, PALANIKUMAR V.

GNANAM and MULLAIRANI GNANAM, whose address is 10597 Creston Glen Cir. E, Jacksonville, FL 32256, the following sums:

i. $7,632.31 (damages), with statutory interest from August 1, 2024;

ii. $16,462.50 (trial-level attorneys' fees) and $878.70 (costs), with statutory interest from August 29, 2024; and

iii. $10,862.50 (appellate attorneys' fees), with statutory interest from the date of this Final Judgment.

iv. TOTAL PRINCIPAL: $35,836.01, plus accrued statutory interest pursuant to Section 55.03, Fla. Stat. For which let execution issue forthwith.

C. Defendants shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on Plaintiffs' counsel within forty-five (45) days from the date of this Final Judgment, unless this Final Judgment is satisfied or post-judgment discovery is stayed.

D. The Court retains jurisdiction to enforce this Final Judgment and to enter further orders that are proper to compel the Defendants to complete Form 1.977, including all required attachments, and serve it on Plaintiffs' counsel.

E. The Court retains jurisdiction of this matter for purposes of enforcement of this Final Judgment.

DONE AND ORDERED in Jacksonville, Duval County, Florida on Thursday, December 4, 2025.

[File stamp: Filing # 237009080 E-Filed 12/04/2025 10:56:12 AM]

APPENDIX G-3 – Order Setting Hearing (10:00 a.m. Session — Defendants' Motions Except for One)

Filing # 232659965 E-Filed 09/30/2025 03:00:32 PM

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,

-vs-

PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM,
Defendant.

ORDER SETTING HEARING

This case is set for a hearing, before the Honorable Shayla Lee on October 17, 2025, at 10:00am by video conferencing via ZOOM. This following specific motions are to be heard at this particular hearing:

- Motion to Correct or Expunge Improper Garnishment-Deft (Docket line 164)
- Motion to Stay Enforcement of Default Final Judgment of Garnishment Pending Appeal (Docket line 165)
- Motion to Strike (Docket line 166)
- Motion (Defendant's) for Release of Excess Garnished Funds, Interest, and for Sanctions Against Plaintiffs (Docket line 170)
- Motion to Compel (Defendant's) Ruling on Motion for Release of Excess Garnished Funds, Interest, and for Sanctions (Docket line 171)

- Motion to Release Garnished Funds Post Bankruptcy and Misrepresentation (Docket line 180)
- Motion to Terminate/Vacate Final Judgment, Orders, Motions as Void for Violation of the Automatic Stay (Docket line 181)
- Motin to Set Aside Final Judgment (Supplement to Amend and Vacate) (Docket line 192)

Time allotted for hearing is 1 hour. All parties must appear by ZOOM unless otherwise permitted to appear in person. If a party wants to appear in person, please contact the Judicial Assistant for the information.

[Petitioners' note: ZOOM login/call-in instructions (items a–b, 2), service list, and ADA-accommodation notice omitted from this reproduction.]

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Tuesday, September 30, 2025.

16-2024-CC-000687-AXXX-MA
09/30/2025 02:04:04 PM
/s/ Shayla Lee
SHAYLA LEE, COUNTY JUDGE
Shayla Lee, Judge
16-2024-CC-000687-AXXX-MA
09/30/2025 02:04:04 PM

APPENDIX G-4 – Order Setting Hearing (11:00 a.m. Session — Plaintiffs' Motions)

Filing # 232660357 E-Filed 09/30/2025 03:02:23 PM

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA

DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
-vs-
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM,
Defendant.

ORDER SETTING HEARING

This case is set for a hearing, before the Honorable Shayla Lee on October 17, 2025, at 11:00am by video conferencing via ZOOM. This following specific motions are to be heard at this particular hearing:

- Motion for Final Judgment (Docket line 163)
- DCA Order Granting Appellee's Motion for Award of Attorneys' Fees and Costs (Docket line 178)
- Motion (Plaintiff's) to Lift Stay and Renewed Motion for Final Judgment of Garnishment (Docket line 182)
- Motion (Plaintiff's) for Judicial Notice of Sanctions Entered Against Defendants (Docket line 184)
- Motion for Attorney's Fees (Plaintiffs'/Appellees') for Award of Appellee Attorneys' Fees and Costs (Docket line 185)

Time allotted for hearing is 1 hour. All parties must appear by ZOOM unless otherwise permitted to appear in person. If a party wants to appear in person, please contact the Judicial Assistant for the information.

[Petitioners' note: ZOOM login/call-in instructions (items a–b, 2), service list, and ADA-accommodation notice omitted from this reproduction.]

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Tuesday, September 30, 2025.

16-2024-CC-000687-AXXX-MA
09/30/2025 02:04:33 PM
/s/ Shayla Lee
SHAYLA LEE, COUNTY JUDGE
Shayla Lee, Judge
16-2024-CC-000687-AXXX-MA
09/30/2025 02:04:33 PM

APPENDIX H – Emergency Amended Motion to Vacate

Final Judgments (Docket D#211), Filed October 22, 2025 (Excerpted — Ground I: Fraud on the Court)

In the County Court of the Fourth Judicial Circuit, in and for Duval County, Florida, Case No. 16-2024-CC-000687

This motion asserted seven independent grounds for vacating the Final Judgments: Ground I (Fraud on the Court), Ground II (Violation of the Federal Automatic Stay), Ground III (Violation of the Permanent Discharge Injunction), Ground IV (Lack of Personal Jurisdiction), Ground V (Lack of Subject Matter Jurisdiction), Ground VI (Fraudulent Inducement and Material Breach), and Ground VII (Violation of Due Process). Only Ground I — Fraud on the Court — is presented in the Appendix; the other grounds are summarized. The pages retained below are the motion's caption and the full Ground I argument, including the evidentiary table of contradictions. The balance of this 38-page motion (Grounds II through VII and accompanying exhibits) is omitted from this booklet-format appendix to comply with Rule 33.1 and will be furnished upon request. See 'Materials Omitted From This Appendix' at the end of this appendix.

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
TRIAL COURT CASE NO.: 16-2024-CC-000687
APPELLATE CASE NO: 5D2024-2417
SUPREME COURT NO: SC2025-0657

NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, Plaintiffs,
vs.
PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, Defendants.
_____/

EMERGENCY AMENDED MOTION TO VACATE FINAL JUDGMENTS AND ALL SUBSEQUENT ORDERS AS VOID DUE TO FRAUD ON THE COURT, VIOLATION OF AUTOMATIC STAY, PERMANENT INJUNCTION, CONSTITUTIONAL DUE PROCESS VIOLATION, AND JURISDICTIONAL VIOLATIONS

GROUND I: THE JUDGMENTS MUST BE VACATED DUE TO FRAUD ON THE COURT (Inherent Power of the Court)

The Final Judgments were based upon perjured testimony and evidence submitted by the Plaintiff, as conclusively proven by his subsequent sworn federal filings (Case No. 3:25-bk-00977-BAJ).

A. Formal Incorporation and Judicial Notice of Evidence (Exhibits)

Defendants formally incorporate by reference and move for the Court to take Judicial Notice of the following sworn federal documents and prior statements: Doc #195 - Bankruptcy Petition #: 3:25-bk-00977-BAJ – EXHIBIT-A. All the "Exhibit A Series" are sworn statements with thorough validation by the court.

1. **Federal Bankruptcy Docket (Exhibit A** - Case No. 3:25-bk-00977-BAJ – Doc #195)

a) EXHIBIT A-1: Disclosed HENDIC LLC Business Interest (SOFA Q.27)

b) EXHIBIT A-2: FALSE STATUS OF FLORIDA STATE COURT PROCEEDINGS

c) EXHIBIT A-3: ZERO ASSET VALUE FORM 106Sum

d) EXHIBIT A-4: Sworn Residency History for Past Three Years (Voluntary Petition Q.5)

e) EXHIBIT A-5: Sworn Historical Income (2023 & 2024) - SOFA Q.5

f) EXHIBIT A-6: POST BANKRUPTCY RENT COMMITMENT REPORTED

2. **Relevant Excerpts of Trial Testimony/Application (Exhibit C – Trial Transcript – Doc #195)**. The **July 30, 2024**, Trial Transcript will show other details, including the fact that Defendant Palanikumar was not allowed to attend. The "Exhibit C Series" are sworn statements made during the trial.

a) EXHIBIT C-1: HENDIC LLC OWNERSHIP AND DURATION

b) EXHIBIT C-2: INCOME STATUS

c) EXHIBIT C-3: ASSET STATUS AND RENTAL INCOME

d) EXHIBIT C-4: Transcript Segments: Establishing Address, Cohabitation, and Damages

e) EXHIBIT C-5: Case in the COUNTY COURT

3. EXHIBIT D - Rental Application Zillow – Rental Application provided by the Plaintiff to the Defendant and discussed in the Trial as evidenced in the Transcript.
4. EXHIBIT E - Rental Application Handwritten Landlord: Rental Application provided by the Plaintiff and also provided by their counsel. It was discussed in the Trial, as evidenced in the Transcript.
5. **EXHIBIT F - Schedule of Post-Petition Void Actions**: The post-petition actions, including motions, pleadings, and court orders, taken after the March 28, 2025, bankruptcy filing are detailed.

The Legal Standard: Fraud on the Court (Cox v. Burke)

The controlling Florida precedent, *Cox v. Burke*, 706 So. 2d 43 (Fla. 5th DCA 1998), establishes that Fraud on the Court is not merely perjury; it is an "unconscionable scheme calculated to improperly influence the court or to prevent the non-offending party from fully exhibiting its case." This standard is critical because it is a direct exception to the one-year limitation for lesser fraud claims under Rule 1.540(b)(3). The Plaintiffs' combined actions satisfy this standard by:

1. **Improper Influence (Perjury):** Using sworn false testimony on income, assets, and residency to mislead the Court's judgment on damages and liability.
2. **Prevention of Defense (Concealment):** Willfully concealing the bankruptcy filing and the resulting Automatic Stay, thereby preventing the Defendants from using the critical bankruptcy

evidence and time in their defense and subsequent appeal.

Evidence of the Unconscionable Scheme: The pattern of sworn misrepresentations, perjury, and concealment is definitively established in the document's Table of Contradictions, which details six (6) material contradictions between sworn statements given to this Court (Trial Transcript, Exhibits C-1 through C-5) and sworn statements given to the Federal Bankruptcy Court (SOFA/Schedules, Exhibits A-1 through A-6). The cumulative effect of these actions satisfies the standard of Fraud Upon the Court, warranting the exercise of this Court's inherent power to vacate the judgments.

The Bankruptcy Petition Information Collection Protocol: A Legal Mandate

The Duval County Court was concerned during the hearings that it did not see W2 wages, etc. The Court needs to note that the Federal Bankruptcy Court acts only on the authentic provision of this information and associated documents.

1. The Federal Bankruptcy Code establishes an exhaustive and legally binding protocol for the collection and disclosure of a Debtor's financial condition, ensuring that the information provided is complete, current, and sworn under penalty of perjury. The Debtor in this **Chapter 7** case was under a non-negotiable legal duty to comply with the following federal requirements:
2. Statutory Duty to File Schedules and Statements: Pursuant to 11 U.S.C. § 521(a)(1)(B) and Federal Rule of Bankruptcy Procedure 1007(b), the Debtor was required to file, among other documents:

a) A **Statement of Financial Affairs (SOFA)**, which mandates the disclosure of **total gross income** from all sources **for the two full calendar years** preceding the filing. This is the official summary of the Debtor's tax filings (e.g., **1040** income, including W-2).

   i. The two (2) full calendar years for the Bankruptcy filed on March 28, 2025, would be "**2023 and 2024**".

b) A detailed **Schedule I: Your Income** (Official Form **106I**) and **Schedule J: Your Expenses** (Official Form **106J**), which provide a comprehensive snapshot of the Debtor's *current* monthly financial status.

3. **Mandatory Submission of Supporting Documents:** The Debtor was further required by **11 U.S.C. § 521(a)(1)(B)(iv)** to provide the Trustee with **copies of all payment advices** (pay stubs) received from an employer within 60 days of the petition date, often containing year-to-date **W-2** wage data.

4. The **Debtor's failure to disclose these legally mandated records to the State Courts**, while simultaneously using fabricated financial testimony in state court, constitutes **concealment** of the highest order. The subsequent material contradictions between the Debtor's sworn state court testimony (fabricating income by hundreds of percent) and their sworn federal bankruptcy disclosures directly prove the Debtor engaged in an **unconscionable scheme** to mislead this Court, defraud the defendants, and secure unjust judgments.

The Evidence of Perjury and Material Contradiction

The following table demonstrates the material contradictions between the sworn statements used to secure the judgment in this Court and the Plaintiff's subsequent sworn federal filings. This evidence demonstrates a fraudulent scheme on the judiciary (transposed for compliance purposes):

1. HENDIC LLC Employment History	
Rental Application (False)	Keita communicated nine years of ownership/employment as his income source to secure the lease (Exhibit D, E)
State Court Testimony (Perjury)	Claimed ownership/employment with HENDIC LLC, "operating since 2018" (Exhibit C-1)
Federal Bankruptcy Filing (Concealment)	Disclosed HENDIC LLC (Exhibit A-1) but swore to no other sole proprietorships (Exhibit A-2); business asset had ZERO value and ZERO income
Conclusion	Fraud on the Court & strategic devaluation: presented as robust income source to induce lease, then swore ZERO value/income to federal court
2. Income Status	
Rental Application (False)	Purported annual income of $72,000–$99,000 (Exhibits D, E)
State Court Testimony (Perjury)	Affirmed this income and rental property ownership under oath (Exhibit C-2)

Federal Bankruptcy Filing (Concealment)	SOFA discloses gross business income for 2023 was $26,295.00 (Exhibit A-5)
Conclusion	Fabrication of income by 376%: overstated by more than 3.7x the sworn federal figure
3. Asset Status	
Rental Application (False)	Communicated $750/month rental income and property ownership on lease application
State Court Testimony (Perjury)	Affirmed false rental income/ownership claim under oath (Exhibit C-3)
Federal Bankruptcy Filing (Concealment)	Disclosed $0.00 rental income and no real property ownership (Schedule A/B & Summary, Exhibit A-3)
Conclusion	Fabrication of assets and income used to influence the Court's perception of standing
4. Post-Termination Residency	
Rental Application (False)	Both tenants claimed residence at 8104 Summer Gate Court, rent $1,650
State Court Testimony (Perjury)	Tompkins testified Keita moved to 8104 Summer Gate Court with her (Exhibit C-4)
Federal Bankruptcy Filing (Concealment)	Keita swore his three-year address was 7638 Fawn Lake Dr S (Exhibit A-4)

Conclusion	Perjury on jurisdiction/damages: false domicile used to establish jurisdiction and cohabitation damages
5. Post-Termination Lease Expense	
Rental Application (False)	Claimed rent differential of $150
State Court Testimony (Perjury)	Tompkins testified to new lease and $150/month increase used for damages calculation (Exhibit C-4)
Federal Bankruptcy Filing (Concealment)	Keita disclosed future rent expense of $1,286 in Schedule J (Exhibit A-6)
Conclusion	Fabrication of damages that inflated the monetary award in the Final Judgment
6. Case Status in Bankruptcy Court	
Rental Application (False)	Concealed the bankruptcy matter entirely
State Court Testimony (Perjury)	Active County Trial Court matter in Duval County on July 30, 2024 (Exhibit C-5)
Federal Bankruptcy Filing (Concealment)	Case represented as "Pending" in Duval Circuit Court on SOFA, NOT marked "On Appeal"
Conclusion	Deception of judicial status to the Bankruptcy Court to prevent the automatic stay from being recognized

The use of materially false sworn statements to obtain a judgment constitutes a fraud upon the Court, requiring the August 1, 2024, and August 16, 2024

(served on August 29), Final Judgments to be vacated.

THE JUDGMENTS MUST BE VACATED DUE TO FRAUD ON THE COURT (Inherent Power of the Court)

The Plaintiffs' actions constitute an unconscionable scheme that corrupted the judicial process, which is defined as Fraud Upon the Court and is subject to no time limitation (superseding the one-year limitation in Rule 1.540(b)(3)).

1. **The Pattern of Perjury and Concealment:** The pattern of sworn misrepresentations, perjury, and concealment is definitively established in the document's **Table of Contradictions**, which details **six (6) material contradictions** between sworn statements given to this Court (Trial Transcript, Exhibits C-1 through C-5) and sworn statements given to the Federal Bankruptcy Court (SOFA/Schedules, Exhibits A-1 through A-6). The contradictions include:
   - Fabrication of income by over **376%**.
   - Perjured testimony on asset ownership and rental income.
   - Perjured testimony on residency post-termination.
   - Perjured testimony for the collection of Differential Rent when Plaintiffs did not even live together post-tenancy in the Defendants' property
   - Concealment of the active State Court trial from the Federal Bankruptcy Court via sworn misrepresentation on the SOFA (Exhibit A-2).
2. The concealment is further proven by the Plaintiffs' **intentional failure** to disclose the Final

Judgments of August 1 and August 16, 2024, as a pre-petition receivable asset, Schedule A/B Property, or Schedule C in the Bankruptcy Schedules, a knowing omission

3. **Conclusion:** The cumulative effect of these actions satisfies the standard of **Fraud Upon the Court**, warranting the exercise of this Court's inherent power to vacate the judgments.

Common Sense Argument: It is a foundational principle of judicial integrity that a party may not actively advance two mutually exclusive factual positions in separate courts for the purpose of securing a singular benefit in each. When the Plaintiffs intentionally contradict evidence—using one set of facts in the State Court (to secure the Judgment) and an entirely different set of facts in the Federal Bankruptcy Court (to secure discharge and protection)—common sense dictates that this calculated, contradictory conduct constitutes a Fraud on the Court. This is the definition of an unconscionable scheme, calculated to interfere with and pervert the impartial administration of justice.

SUMMARY OF GROUNDS II THROUGH VII

GROUND II: ACTIONS ARE VOID AND UNENFORCEABLE UNDER FEDERAL BANKRUPTCY LAW

The proceedings violated both the temporary automatic stay and the permanent discharge injunction. The August 1 and August 29, 2024 judgments constituted a pre-petition receivable in favor of Plaintiff, which became property of the bankruptcy estate under 11 U.S.C. § 541(a)(1) upon the Chapter 7 filing on March 28, 2025. Section 362(a)(3) then prohibited any act to exercise control over property of the estate,

yet Plaintiffs continued to litigate. The order of the Fifth District Court of Appeal dated May 1, 2025, barring Defendants from further pro se filings and disallowing the Reply Brief, was entered thirty-four days after the stay attached; every appellate order dependent on it is void for the same reason. Plaintiff also misdescribed the proceeding as "Circuit Civil" when it was County Civil, and its status as "pending" when it was on appeal. Relief sought: the judgments and all subsequent orders be declared void under Fla. R. Civ. P. 1.540(b)(4).

GROUND III: PERMANENT INJUNCTION AND JURISDICTIONAL DEFECTS (11 U.S.C. § 524)

Plaintiff was granted a discharge on July 2, 2025 and the bankruptcy case was closed on August 7, 2025. Section 524(a)(2) operates as a permanent injunction against any act to collect, recover or offset a discharged debt, including the continuation of litigation. Maintaining the Final Judgments on the docket is such an act. Relief sought: a permanent injunction against Plaintiffs pursuant to 11 U.S.C. § 524(a)(2).

GROUND IV: JUDGMENTS ARE VOIDABLE DUE TO LACK OF PERSONAL JURISDICTION (Improper Service)

Plaintiffs failed to serve Defendants with process after learning, from email correspondence dated January 17, 2024, that Defendants resided in India. Florida Rule of Civil Procedure 1.070(h) requires that service upon an individual in a foreign country be accomplished under any applicable treaty or convention, here the **Hague Service Convention**. The defect was raised repeatedly below and never resolved

by a reasoned order containing findings of fact and conclusions of law. Relief sought: the judgments be declared void for want of personal jurisdiction.

GROUND V: JUDGMENTS ARE VOIDABLE DUE TO LACK OF SUBJECT MATTER JURISDICTION (Premature Filing)

The initial Complaint was filed January 9, 2024, twenty-four days after Plaintiffs vacated the property, before the period under Florida Statute § 83.49(3)(a) had run. Failure to satisfy a statutory condition precedent deprived the trial court of subject matter jurisdiction over the security deposit claim. The defect was raised repeatedly below and never resolved by a reasoned order. Relief sought: the judgments be declared void for premature filing, want of subject matter jurisdiction.

GROUND VI: JUDGMENTS VOIDABLE DUE TO PLAINTIFFS' FRAUDULENT INDUCEMENT AND MATERIAL BREACH (FL. STAT. § 83.56(2)(a))

Plaintiffs made material misrepresentations of employment, income and financial standing on the rental application, in violation of Florida Statute § 817.41, which prohibits fraudulent misrepresentation in business transactions. The factual basis is the same pattern of sworn contradiction set out in Ground I, between the trial testimony and the federal bankruptcy filings. Such statutory fraud renders the lease voidable at Defendants' option and constitutes material noncompliance under Florida Statute § 83.56(2)(a). Relief sought: the judgments be set aside.

GROUND VII: VIOLATION OF DUE PROCESS (5th and 14th Amendments)

Plaintiffs' willful concealment of the Chapter 7 filing from the trial court and from Defendants deprived Defendants of notice that the state proceedings had been halted and rendered void by federal law, and of any opportunity to be heard on the binding effect of the federal action. Defendants were forced to continue defending and to file void appeals. Orders entered without jurisdiction and upon a concealed material fact were obtained through a process fundamentally unfair to Defendants. Relief sought: the orders be vacated as void.

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Plaintiff Nathaniel Chibuzor Keita's Chapter 7 Bankruptcy Filing - U.S. Bankruptcy Court, M.D. Fla., Case No. 3:25-bk-00977 (March 28 - August 7, 2025)

Note on Reproduction

The bankruptcy filings reproduced in this appendix were filed on paper larger than 6⅛ by 9¼ inches and cannot be photo-reduced for booklet format. Petitioners have therefore set out their contents in typeset form rather than as images.

Reproduced here are selected pages of the debtor's schedules and statements filed April 16, 2025 (Doc 15 alone is a 60-page filing and the whole report is 129 pages), together with the Order of Discharge entered July 2, 2025 (Doc 23) and the Order Approving Account, Discharging Trustee, Canceling Bond, and Closing Estate entered August 7, 2025 (Doc 26). Each section identifies the document and page from which it is drawn. Figures, checkbox selections, and dates appear as filed.

The columns provided for a second debtor are omitted throughout, this not being a joint case, and the debtor's Social Security number is omitted. The complete filings are part of the record of the United States Bankruptcy Court for the Middle District of Florida in Case No. 3:25-bk-00977-BAJ. Petitioners will furnish the complete filings on 8.5 x 11 inch paper promptly upon request of the Clerk or any member of the Court.

1. The petition was filed March 28, 2025. Discharge was granted July 2, 2025. The estate was closed August 7, 2025.
2. The case is designated "Voluntary; No asset."
3. The August 2024 judgment against Petitioners is not scheduled. Lines 30, 34, and 38 of Schedule A/B are answered No; line 33 discloses only an insurance claim for water damage to a vehicle.
4. Neither Plaintiffs' Counsel nor his legal firm appear among the list of creditors listed in Schedule E/F.
5. Neither Petitioner appears among the sixteen unsecured creditors listed in Schedule E/F.
6. Statement of Financial Affairs Question 9 lists the Duval County action with status "Pending." "On appeal" is not checked. Appeal 5D2024-2417 had been pending since August 29, 2024.
7. Statement of Financial Affairs Question 10, asking whether any property was garnished within one year, is answered No. The writ was then active.
8. Schedule I states employment status "Not employed" and $0.00 at lines 2, 3 and 4, and $6,000.80 at line 8a.

Sworn statements and omissions, and the federal provisions engaged

Sworn statement or omission	Source and provision engaged
The August 2024 judgment against Defendants — a pre-petition receivable — is not scheduled. Line 30 (other amounts owed to you): No. Line 33 (claims against third parties): discloses only an insurance claim for water damage to a vehicle. Line 34 (contingent and unliquidated claims of every nature): No. Line 38 (accounts receivable already earned): No.	Doc 15, Sched. A/B, pp. 7–9 11 U.S.C. § 541(a)(1) — the claim disclosed or not became property of the estate on filing
Total personal property $25,834.34; total real estate $0.00. The judgment appears in no category.	Doc 15, Sched. A/B, p. 11 11 U.S.C. § 541(a)(1)
Sixteen unsecured creditors listed. Neither Defendant appears.	Doc 15, Sched. E/F, pp. 17–26 11 U.S.C. § 524 — scope of discharge as to unlisted parties
Question 9, lawsuits within one year: the Duval County action is listed with status "Pending" checked. "On appeal" and "Concluded" are not checked. The appeal, 5D2024-2417, had been pending since August 29, 2024.	Doc 15, SOFA, p. 43 11 U.S.C. § 362 — status of the state proceeding concealed
Question 10, whether any property was repossessed, foreclosed,	Doc 15, SOFA, p. 44

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Sworn statement or omission	Source and provision engaged
garnished, attached, seized or levied within one year: No.	11 U.S.C. § 362 — garnishment then active
Question 21, safe deposit boxes within one year: No.	Doc 15, SOFA, p. 48 11 U.S.C. § 541(a)(1)
Schedule A/B line 19, interests in an LLC, partnership or joint venture: No. SOFA Question 27 lists Hendic LLC and StrategyQuo, LLC and checks both "member of an LLC" and "owner of at least 5% of voting or equity securities."	Doc 15, pp. 5, 50–51 Internal contradiction within one filing
Schedule I, employment status: Not employed. Lines 2, 3 and 4: $0.00. Line 8a, net income from rental property and business: $6,000.80.	Doc 15, Sched. I, pp. 29–31 Financial contradiction with Appendix T-3-A (Trial Testimony)
SOFA Question 4 reports gross income of $16,499.00 in wages and $6,035.00 from business for 2024, and $26,295.00 from business for 2023. The rental application and trial testimony state annual income of $72,000 and $99,000.	Doc 15, SOFA, p. 41; Appendix T-3-A Financial contradiction to trial testimony

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Sworn statement or omission	Source and provision engaged
Discharge granted July 2, 2025; estate closed August 7, 2025. Collection of the judgment continued thereafter.	Doc 23, p. 3; Doc 26 11 U.S.C. § 524(a)(2) — discharge injunction

Plaintiff Nathaniel Chibuzor Keita's Chapter 7 Bankruptcy Docket
Case No. 3:25-bk-00977-BAJ

Item	Docket Information
Court	U.S. Bankruptcy Court, Middle District of Florida (Jacksonville)
Bankruptcy Petition #	3:25-bk-00977-BAJ
Case flags	MEANSNO, CLOSED
Assigned to	Jason A. Burgess
Chapter	7
Type	Voluntary; No asset
Date filed	03/28/2025
341 meeting	05/09/2025
Deadline for objecting to discharge	06/30/2025
Debtor discharged	07/02/2025

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Item	Docket Information
Date terminated	08/07/2025
Debtor disposition	Standard Discharge
Debtor	Nathaniel Chibuzor Keita 7638 Fawn Lake Dr S Jacksonville, FL 32256-3682 DUVAL-FL
Debtor's counsel	Shawn A. DeVries The DeVries Law Firm, P.A. 644 Cesery Boulevard, Suite 250 Jacksonville, FL 32211 904-348-0030
Trustee	Eugene H. Johnson 2771 Monument Road, Ste 29-410 Jacksonville, FL 32225 904-652-2400
U.S. Trustee	United States Trustee – JAX 13/7 George C. Young Federal Building 400 West Washington Street, Suite 1100 Orlando, FL 32801 407-648-6301

Show Enhanced Docket Report
No Sua Sponte eOrders found for this case
Display eOrder History for this case – None was displayed.

[Source: U.S. Bankruptcy Court, Middle District of Florida, docket report retrieved August 26, 2025. Debtor's SSN/ITIN omitted by Petitioners.]

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Doc 15, Page 41 – Income 2024 and 2023

Part 2: Explain the Sources of Your Income

4. Did you have any income from employment or from operating a business during this year or the two previous calendar years?
Answer: Yes.

Period	**Sources of income (check all that apply)**	**Gross income (before deductions and exclusions)**
From January 1 of current year until the date you filed for bankruptcy:	Operating a business	$5,233.87
For last calendar year: (January 1 to December 31, 2024)	Wages, commissions, bonuses, tips	**$16,499.00**
	Operating a business	$6,035.00
For the calendar year before that: (January 1 to December 31, 2023)	Operating a business	**$26,295.00**

5. Did you receive any other income during this year or the two previous calendar years?
Answer: No. No entries.

[Petitioners' note: Debtor 2 columns are blank throughout; this is not a joint case.]

Doc 15, Page 29 – Schedule I – Income

Case 3:25-bk-00977-BAJ Doc 15 Filed 04/16/25
Page 29 of 60
Official Form 106I — Schedule I: Your Income
(12/15)

Case identification

Item	Entry
Debtor 1	Nathaniel Chibuzor Keita
Debtor 2 (spouse, if filing)	(blank)
United States Bankruptcy Court for the	Middle District of Florida
Case number	3:25-bk-00977
An amended filing	Not checked
Supplement showing postpetition chapter 13 income	Not checked

Part 1: Describe Employment

Item	Debtor 1
Employment status	Not employed
Occupation	(blank)
Employer's name	(blank)

Item	Debtor 1
Employer's address	(blank)
How long employed there?	(blank)

Part 2: Give Details About Monthly Income
Estimate monthly income as of the date you file this form.

Line	Item	For Debtor 1
2	List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	$0.00
3	Estimate and list monthly overtime pay.	$0.00
4	Calculate gross income. Add line 2 + line 3.	$0.00

Doc 15, Pages 30–31 – Schedule I Continued

Case 3:25-bk-00977-BAJ Doc 15 Filed 04/16/25
Pages 30–31 of 60
Debtor 1: Nathaniel Chibuzor Keita

Line	Item	For Debtor 1
4.	Copy line 4 here.	$0.00
5.	List all payroll deductions:	

Line	Item	For Debtor 1
5a.	Tax, Medicare, and Social Security deductions	$0.00
5b.	Mandatory contributions for retirement plans	$0.00
5c.	Voluntary contributions for retirement plans	$0.00
5d.	Required repayments of retirement fund loans	$0.00
5e.	Insurance	$0.00
5f.	Domestic support obligations	$0.00
5g.	Union dues	$0.00
5h.	Other deductions. Specify: (blank)	$0.00
6.	**Add the payroll deductions. Add lines 5a + 5b + 5c + 5d + 5e + 5f + 5g + 5h.**	**$0.00**
7.	**Calculate total monthly take-home pay. Subtract line 6 from line 4.**	**$0.00**
8.	List all other income regularly received:	
8a.	Net income from rental property and from operating a business, profession, or farm	$6,000.80
8b.	Interest and dividends	$0.00
8c.	Family support payments that you, a non-filing spouse, or a dependent regularly receive	$0.00

Line	Item	For Debtor 1
8d.	Unemployment compensation	$0.00
8e.	Social Security	$0.00
8f.	Other government assistance that you regularly receive. Specify: (blank)	$0.00
8g.	Pension or retirement income	$0.00
8h.	Other monthly income. Specify: (blank)	$0.00
9.	**Add all other income. Add lines 8a + 8b + 8c + 8d + 8e + 8f + 8g + 8h.**	**$6,000.80**
10.	**Calculate monthly income. Add line 7 + line 9.**	**$6,000.80**
11.	State all other regular contributions to the expenses that you list in Schedule J. Specify: (blank)	$0.00
12.	**Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income.**	**$6,000.80**

13. Do you expect an increase or decrease within the year after you file this form?
Answer: No.

Doc 15, Pages 5, 7, 8, 9 and 11 – Schedule A/B: Property

Case 3:25-bk-00977-BAJ Doc 15 Filed 04/16/25
APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Official Form 106A/B — Schedule A/B: Property (12/15)

Pg	Line	Item	Answer
5	19.	Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture	No
7	30.	Other amounts someone owes you	No
8	33.	Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment	Yes — "Pending claim against Insurance company for water damage to vehicle"; value: unknown
8	34.	Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims	No
9	38.	Accounts receivable or commissions you already earned	No
11	55.	Part 1: Total real estate	$0.00

APPENDIX I – Plaintiffs' Chapter 7 Bankruptcy Report

Pg	Line	Item	Answer
11	62.	Total personal property	$25,834.34
11	63.	Total of all property on Schedule A/B	$25,834.34

10.	**Calculate monthly income. Add line 7 + line 9.**	**$6,000.80**
11.	State all other regular contributions to the expenses that you list in Schedule J. Specify: (blank)	$0.00
12.	**Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income.**	**$6,000.80**

Doc 15, Page 26 – Schedule E/F: Totals

Case 3:25-bk-00977-BAJ Doc 15 Filed 04/16/25
Page 26 of 60
Official Form 106E/F — Part 4: Add the Amounts for Each Type of Unsecured Claim

Line	Item	Total claim
6a.	Domestic support obligations	$0.00
6b.	Taxes and certain other debts you owe the government	$29,972.00
6c.	Claims for death or personal injury while you were intoxicated	$0.00

Line	Item	Total claim
6d.	Other. Add all other priority unsecured claims.	$0.00
6e.	**Total. Add lines 6a through 6d.**	**$29,972.00**
6f.	Student loans	$0.00
6g.	Obligations arising out of a separation agreement or divorce that you did not report as priority claims	$0.00
6h.	Debts to pension or profit-sharing plans, and other similar debts	$0.00
6i.	Other. Add all other nonpriority unsecured claims.	$63,894.65
6j.	**Total. Add lines 6f through 6i.**	**$63,894.65**

Doc 23, Page 3 – Order of Discharge

Case 3:25-bk-00977-BAJ Doc 23 Filed 07/04/25
Page 3 of 4
Official Form 318 (12/15)

Debtor 1: Nathaniel Chibuzor Keita
United States Bankruptcy Court, Middle District of Florida
Case number: 3:25-bk-00977-BAJ

ORDER OF DISCHARGE

IT IS ORDERED: A discharge under 11 U.S.C. § 727 is granted to:

Nathaniel Chibuzor Keita

Dated: July 2, 2025

/s/ Jason A. Burgess

United States Bankruptcy Judge

[Petitioners' note: The standard "Explanation of Bankruptcy Discharge in a Chapter 7 Case" printed on Official Form 318 is omitted. Debtor's Social Security number omitted by Petitioners.]

Doc 26 – Order Approving Account, Discharging Trustee, Canceling Bond, and Closing Estate

Case 3:25-bk-00977-BAJ Doc 26 Filed 08/07/25
Page 1 of 1

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

In re: Nathaniel Chibuzor Keita, Debtor
Case No. 3:25-bk-00977-BAJ, Chapter 7

ORDER APPROVING ACCOUNT, DISCHARGING TRUSTEE, CANCELING BOND, AND CLOSING ESTATE

The Court finds that the Trustee in the above-captioned case has completed all disbursements, if any,

as required, has rendered a full and complete account thereof, and has performed all duties required for the administration of this estate. Accordingly, it is

ORDERED:

1. The account of the Trustee is approved and allowed, the estate is fully administered, and the estate is closed.

2. The Trustee is discharged from and relieved of the trust, the bond of the Trustee is canceled, and the surety or sureties thereon are released from further liability thereunder, except any liability which may have accrued during the time such bond was in effect.

3. All motions/objections/applications that have not been resolved are denied as moot.

4. The Clerk shall dispose of any exhibits left unclaimed in any matter or proceeding unless notified by the appropriate party within 30 days.

*All references to "Debtor" shall include and refer to both the debtors in a case filed jointly by two individuals.

Dated: August 7, 2025
/s/ Jason A. Burgess
United States Bankruptcy Judge

APPENDIX J – Motion to Compel Clerk

Emergency Motion to Compel Clerk to Search and Produce Notice of Automatic Stay (Dec 9, 2025) (Tr. Court Docket No. D#251)

NOTE ON REPRODUCTION

Because of the length and space constraints applicable to a booklet-format appendix, the full text of this motion is not reproduced here. A summary of its substance appears below. The motion is part of the record in the trial court proceedings below. Petitioners will furnish the complete motion, together with any accompanying exhibits, promptly upon request of this Court or the Clerk.

SUMMARY OF THE MOTION

Relief sought. On December 9, 2025, Petitioners moved the county court for an order compelling the Clerk of Court for Duval County, Florida to conduct a specific search of all physical and electronic records in Case No. 16-2024-CC-000687 for any document, notice, or communication titled "Notice of Automatic Stay," "Suggestion of Bankruptcy," or any other communication received from the United States Bankruptcy Court in Case No. 3:25-bk-00977-BAJ after March 28, 2025.

Basis. At a hearing held December 4, 2025, the trial court acknowledged that it receives notices from the federal courts directing that proceedings stop. Petitioners' review of the Clerk's CORE case-management system disclosed that the system maintains a designated document type styled "Notice of Automatic Stay." No such document appears on the docket in this case.

The stay period. Respondent Nathaniel Chibuzor Keita filed a Chapter 7 bankruptcy petition on March 28, 2025. The automatic stay under 11 U.S.C. § 362 remained in effect until the bankruptcy case closed on August 7, 2025. During that period, the state courts entered multiple orders, including the order of May 1, 2025 barring Petitioners from further pro se filings. The August 12, 2025 dispositions rest on filings and orders entered during the stay.

The jurisdictional question presented. The absence of any stay notice on the public docket leaves unresolved a fact that governs the validity of those orders: whether no notice was ever transmitted, or whether a notice was transmitted and was not processed by the Clerk's office. If a notice was received, the court had constructive notice of the stay, and judicial actions taken between March 28, 2025 and August 7, 2025 — and actions resting on them — are void ab initio.

Burden. Given the court's own acknowledgment that it receives such notices, and the existence of a designated document type for them in the Clerk's system, the search requested imposes minimal administrative burden.

Relief requested. Petitioners asked the court to direct the Clerk to conduct the search and to file, within seven days, a brief sworn affidavit or one-page certification of the record stating either (A) that the notice was found, producing a copy and the date it was received or filed, or (B) that no such notice or communication exists in the court file or records.

Disposition. The motion was not ruled upon. No order addressing it appears on the trial court docket

APPENDIX J – Motion to Compel Clerk

APPENDIX K – Motion to Compel Documents from Plaintiffs

Emergency Motion to Compel Production of Documents from Plaintiffs (December 11, 2025)

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

TRIAL COURT CASE NO.: 16-2024-CC-000687
APPELLATE CASE NO: 5D2024-2417
FL SUPREME COURT NO: SC2025-0657

NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, Plaintiffs,
vs.
PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, Defendants.
_____/

DEFENDANTS' EMERGENCY MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM PLAINTIFFS

COMES NOW Defendants/Appellants/Petitioners, Palanikumar V. Gnanam and Mullairani Gnanam, appearing Pro se, hereby submit DEFENDANTS' EMERGENCY MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM PLAINTIFFS, jointly.

Defendants/Appellants/Petitioners, PALANIKUMAR V. GNAMAM and MULLAIRANI GNAMAM (the "Defendants"), appearing Pro se, bring this Motion to Compel pursuant to Florida Rule of Civil Procedure 1.350(a), and respectfully move this Honora-

ble Court for an Order compelling the Plaintiffs, NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, and their Counsel, to immediately produce documents essential for litigating the Defendants' pending motions, specifically the Emergency Amended Motion to Vacate (Docket # D211) and the Motion for Sanctions (Docket # D222), and for establishing Fraud on the Court. In support, the Defendants state:

I. PROCEDURAL HISTORY AND GROUNDS FOR COMPULSION

9. **Prior Discovery Request:** On **May 15, 2024**, Defendants filed their **Notice on Defendants Full Disclosure Request to Plaintiffs** (Docket **# D40**, Filing **# 198391885**), formally requesting key financial documents from Plaintiffs, including income statements and personal tax returns.

10. **Failure to Produce:** Plaintiffs and their Counsel have not produced the previously requested documents, and the need for these materials has become newly relevant due to information disclosed after the original request. The information is necessary for Defendants to prove the merits of their pending motions.

11. **Fraud and Perjury (Inconsistent Testimony):** The documents sought are now demonstrably material and necessary because the Plaintiff, **NATHANIEL CHIBUZOR KEITA**, provided materially inconsistent sworn testimony, as proven by documents already filed in this Court:

    a. At the trial in this Court on **July 30, 2024**, the Plaintiff testified to an annual income of ap-

proximately **$99,000 to $100,000** (Trial Transcript, **pages 51-52**, **Docket # D120**, referencing sworn testimony on income and assets, **Exhibits C-2 and C-3 in Docket # 211 Emergency Amended Motion to Vacate**).

b. Subsequently, the Plaintiff filed a Chapter 7 Bankruptcy Petition (U.S. Bankruptcy Case No. **3:25-bk-00977-BAJ**, filed March 28, 2025), where the official, sworn Bankruptcy Schedules (Page 2 of Form 107) reported income for the same period in the **$20,000 range** (Bankruptcy Records filed in this case Physical Page 80 of 129, and Page 40 of 60 in Bankruptcy Forms, in Docket # **D195**, specifically **Exhibit A-5 in Docket #211 Emergency Amended Motion to Vacate**).

12. Materiality:

a. This vast income disparity constitutes strong, non-frivolous evidence of **perjury** and **Fraud on the Court** during the state court trial. The production of the precise bankruptcy schedules and communications demanded below is required to confirm the full extent of this fraud.

b. Defendants further state that the relevance of these documents became clear only after the Plaintiffs' bankruptcy filings revealed material inconsistencies with prior sworn testimony.

13. **Relevance to Stay Violation:** The bankruptcy documents are necessary to prove that Plaintiffs may have had **actual notice** of the **Automatic Stay** and failed to file the required **Suggestion**

of Bankruptcy in this State Court case, which was addressed by Defendants' subsequent filing of the Bankruptcy Records (**Docket # D195**). This concealment led to the entry of potentially **VOID *AB INITIO*** orders.

II. Prima Facie Case

1. **The Prima Facie Case Supporting Discovery Requested:** Defendants assert that the evidence presented in **Points 3-5** of this Motion and those found in the Emergency Amended Motion to Vacate (Specifically Grounds I, II, III and VII in Docket# D211) constitute a **prima facie showing** that Plaintiffs committed **Fraud on the Court** and/or a knowing, willful violation of the **Automatic Stay** (11 U.S.C. § 362). This showing is grounded in: (a) the conflicting sworn income statements and other statements in Docket# 211 establishing perjury; and (b) the deliberate **concealment** of the federal Automatic Stay, which was necessary to **enable** subsequent, jurisdictionally **void** orders to be issued by this Court.
2. **Contradictory Sworn Statements and Supporting Evidence (Referencing Emergency Amended Motion to Vacate, Grounds 1, 2, 3, and 7)**: Plaintiff Nathaniel Chibuzor Keita has provided materially inconsistent sworn statements regarding his income, as detailed not only in the trial transcript but also in the Emergency Amended Motion to Vacate (Docket # D211), specifically Grounds 1, 2, 3, and 7, where additional documentary evidence is set forth.
   a. At the July 30, 2024, trial, Plaintiff testified under oath to earning approximately **$99,000**

to $100,000 annually (Trial Transcript, pp. 51–52).

b. In his subsequent Chapter 7 Bankruptcy filing (Case No. 3:25-bk-00977-BAJ), Plaintiff swore under penalty of perjury that his income for the same period was in the **$20,000 range** (Bankruptcy Schedules, including Schedule I and Form 107, as incorporated in Docket # D211, Grounds 1, 2, 3, and 7).

These contradictions—combined with the additional exhibits and inconsistencies presented in **Grounds 1, 2, 3, and 7 of the Emergency Amended Motion to Vacate**—constitute **prima facie evidence of misrepresentation**, thereby establishing a sufficient factual basis for the limited disclosures requested in this motion.

3. **Concealment of Bankruptcy Filing:** Plaintiffs filed a Chapter 7 Bankruptcy on **March 28, 2025**, but no Suggestion of Bankruptcy or notice of the Automatic Stay was filed in this State Court case. Despite the stay, Plaintiffs continued litigating and obtaining relief. Concealment of a federal bankruptcy case during active state proceedings establishes a prima facie basis for further inquiry.
4. **State Court Orders Entered During Automatic Stay:** Multiple State Court actions—including post-judgment enforcement, garnishment proceedings, and hearings—continued after March 28, 2025. Any orders entered during an active bankruptcy stay are **void ab initio** under 11 U.S.C. § 362. This creates a direct legal question regarding when Plaintiffs and/or their counsel received notice of the bankruptcy.

APPENDIX K – Motion to Compel Documents from Plaintiffs

5. **Certified Federal Bankruptcy Records:** The bankruptcy filings, schedules, and notices already submitted in this case are certified federal documents and are self-authenticating. Their existence establishes a reliable factual basis requiring clarification of when Plaintiffs became aware of the bankruptcy and whether any notice was communicated to State Court counsel.
6. **Motive and Benefit Derived From Concealment:** Plaintiffs benefited from the continuation of the State Court case during the pendency of their bankruptcy, including the entry of rulings, enforcement actions, and other relief that would have been prohibited under the Automatic Stay. This provides prima facie circumstantial evidence supporting the need to determine the timeline of Plaintiffs' knowledge of the bankruptcy.
7. **Breach of Duty to Disclose:** Plaintiffs and their State Court counsel had an affirmative duty to notify this Court of the bankruptcy filing and the resulting Automatic Stay. The absence of such notice, combined with continued litigation, satisfies the prima facie threshold for requiring production of non-privileged notices and clarification regarding when Plaintiffs and their counsel became aware of the bankruptcy.

Accordingly, the above record evidence establishes a clear prima facie basis for the limited, non-privileged disclosures requested in Section 3, which are necessary to determine when Plaintiffs and/or their counsel first received notice of the bankruptcy and the Automatic Stay.

III. DOCUMENTS TO BE COMPELLED

Pursuant to the Florida Rules of Civil Procedure, Plaintiffs and their Counsel are hereby compelled to

produce the following documents **within seven (7) days** of the entry of the Court's Order:

1. Original Discovery Items (As Requested in Docket #D40):
   a. Income statements filed by HENDIC LLC for the period covering the Plaintiff's sworn trial testimony.
   b. Plaintiff Nathaniel Chibuzor Keita's personal tax returns for the years 2023 and 2024.
2. Bankruptcy Documents (Direct Evidence of Fraud):
   a. The complete **U.S. Bankruptcy Petition** (Case No. **3:25-bk-00977-BAJ**), specifically the Official Forms for **Schedules I (Current Income)** and **J (Current Expenditures)**, which prove the sworn income representation made to the federal court.
   b. The **"Notice of Bankruptcy Case Filing"** (Notice of Commencement) received from the U.S. Bankruptcy Court, which contains the statutory warning regarding the Automatic Stay (11 U.S.C. § 362).
   c. Although the bankruptcy petition and schedules are public records, Defendants request that Plaintiffs confirm whether they received the Bankruptcy Court's Notice of Filing, including the date of receipt, and whether any such notice was forwarded to counsel or the Court.
3. Communication Regarding Stay Violation:

a. **Disclaimer on Privilege:** Defendants want to be clear that they are **not requesting attorney-client privileged communications or attorney work-product materials.** Defendants seek only factual clarification as to the date and manner of notice relating to the **Automatic Stay** and any related Bankruptcy Court orders or notices.

b. **Statement of Notice (Factual Clarification):** Defendants request clarification regarding when Plaintiffs or their counsel first became aware of the Chapter 7 Bankruptcy filing in Case No. **3:25-bk-00977-BAJ**. Specifically, Defendants request that Plaintiffs formally state whether they or their counsel received notice of the bankruptcy filing before or during the pendency of motions or hearings in this case (Case No. **16-2024-CC-000687**), and, if so, the **specific date** such notice was received.

c. Defendants request that Plaintiffs produce all non-privileged documents, notices, and communications received from the U.S. Bankruptcy Court in Case No. 3:25-bk-00977-BAJ that relate to:

   i. **The Notice of Bankruptcy Case Filing** (also referred to as the Notice of Commencement);

   ii. Any Notice of Automatic Stay under 11 U.S.C. § 362;

   iii. Any bankruptcy-generated notices, mailings, or correspondence addressed to Plaintiffs or their Counsel;

iv. **Any transmittal, forwarding, or sharing of such bankruptcy notices** between Plaintiffs and their counsel, to the extent such transmittal consists only of forwarding the Bankruptcy Court's notice and **does not reveal attorney-client communications or attorney work-product.**

4. Defendants expressly clarify that they do not seek the content of attorney-client communications or attorney work-product. Defendants seek only: (a) the bankruptcy notices themselves, and (b) the fact and date of receipt and any forwarding of those notices, as these are not privileged and are directly relevant to determining whether Plaintiffs and/or their counsel were aware of the Automatic Stay during the pendency of this case.

   a. Clarification Regarding Bankruptcy Notice: Defendants request that Plaintiffs state whether their counsel became aware of the bankruptcy filing before or during the pendency of motions or hearings in this case, and if so, the date such notice was received.

   b. The Defendants do not request internal attorney communications. Defendants seek only non-privileged notices and documents described in subsections (a) through (c).

IV. RELIEF REQUESTED

WHEREFORE, Defendants respectfully request that this Honorable Court enter an Order:

1. Compelling Plaintiffs, NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, and their

Counsel to produce the documents listed in Section III above, within seven (7) days of the entry of this Order.

2. Reserving jurisdiction to impose appropriate sanctions, including but not limited to attorney's fees, costs, and any relief permitted under the Rules of Florida Civil Procedure, should Plaintiffs fail to comply with this Order or if the compelled documents confirm the commission of Fraud on the Court.
3. Granting any further relief the Court deems just and proper.

Defendants expressly reserve the right to amend, supplement, or renew this motion as additional evidence or record materials become available.

Dated: December 11, 2025
Respectfully submitted,
/s/ Palanikumar V Gnanam, Defendant
/s/ Mullairani Gnanam, Defendant

APPENDIX L – Motion to Set Aside and Vacate Dec 4, 2025 Orders

DEFENDANTS' CONSOLIDATED MOTION TO SET ASIDE AND VACATE ORDERS D240, D241, D242, D243, D247, AND D249 BASED ON PERMANENT FEDERAL DISCHARGE, FRAUD ON THE COURT, LACK OF JURISDICTION, AND BREACH OF OATH

(Docket D#268, December 29, 2025)

Note on Reproduction

Because of the length and space constraints applicable to a booklet-format appendix, the full text of this motion is not reproduced here. A summary of its substance appears below, followed by the prayer for relief reproduced verbatim. The motion is part of the record in the trial court proceedings below. Petitioners will furnish the complete motion, together with any accompanying exhibits, promptly upon request of this Court or the Clerk.

Summary of Motion Filed

On December 29, 2025, Petitioners moved to set aside and vacate four orders entered December 4, 2025 (D240, D241, D242 and D243) and two recorded final judgments entered December 8, 2025 (D247 and D249).

The motion asked the court to stay all collection and garnishment activity until two earlier filings were decided on the merits: the jurisdictional challenges raised in D211, to which Plaintiffs had filed no response, and the allegations in the Motion for Sanctions at D222. Petitioners had already moved for hearings on both, and those hearing requests remained outstanding.

The motion also asked the court to take judicial notice of three filings made in the preceding weeks, including the federal bankruptcy discharge and final decree entered in Respondent Keita's Chapter 7 case.

Common Grounds for Relief

1. **Lack of Subject Matter Jurisdiction:** Under 11 U.S.C. § 362, any order entered by a state court while a federal stay is in effect is void ab initio. Under 11 U.S.C. § 524, the Discharge Injunction divested the Court of jurisdiction to enter any judgment intended to collect a discharged debt or related fees. Orders D240, D241, D242, and D243 — and their recordings at D247 and D249 — were entered without legal authority.
2. **Fraud on the Court:** The orders were obtained through a calculated strategy of concealment and perjury.
   a. *Concealment of Federal Discharge:* Plaintiffs withheld the fact of the federal discharge from the Court, allowing it to proceed as if the debt were valid while knowing it was permanently barred by § 524.
   b. *Perjury Regarding Case Status:* Plaintiffs represented the matter to the appellate court as "pending" in state court without disclosing the federal jurisdictional bar, causing that court to issue mandates on a false record.
   c. *Judicial Estoppel:* Plaintiffs could not treat the debt as subject to discharge in the federal forum and as valid in the state forum for the purpose of seizing Defendants' assets.
3. **Breach of Judicial Oath and the Supremacy Clause:** The Court is bound by Article VI, Clause

3 of the United States Constitution and Article II, Section 5(b) of the Florida Constitution to support, protect, and defend the Constitution. At the December 4, 2025 hearing the Court stated that "we live in the United States of Florida (sic)," and that what is happening in bankruptcy court "typically has no bearing on what is happening in county court, other than they can tell me to halt my proceedings until they are finished doing something."

a. *The Constitutional Error:* Federal bankruptcy law does not merely have "bearing" — it strips the state court of subject matter jurisdiction entirely.

b. *Failure to Acknowledge the "Halt":* The Court acknowledged that a bankruptcy court can halt its proceedings, yet declined to apply that halt when presented with the Automatic Stay and the Discharge Injunction.

c. *Violation of Oath:* Any order issued on the premise that Florida operates under a separate judicial structure permitting it to ignore a federal discharge is unconstitutional and void.

4. Failure to Issue Written Orders on Jurisdictional Motions (D181 and D192):

a. *The Procedural Requirement:* An oral pronouncement from the bench is not a rendition; an order must be reduced to writing, signed, and filed with the Clerk.

b. *The Unresolved Challenges:* D181 and D192 were addressed verbally, but no written orders were entered.

c. *The Resulting Void:* A case cannot reach finality while jurisdictional defenses remain legally pending, rendering the subsequent judgments void.

5. Premature Entry of Recorded Judgments While Jurisdictional Issues Remained Unresolved (D211 and D222):
   a. *Failure to Hear D211:* The Emergency Amended Motion to Vacate raised seven independent grounds and was never heard or addressed.
   b. *Failure to Hear D222:* A court cannot finalize a case while a motion alleging fraud on the court by the prevailing party remains outstanding.
   c. *Recording During Active Briefing:* The Final Judgment in Garnishment was recorded December 8, 2025 — the same day Defendants filed their reply on sanctions at D248.
   d. *The "Proof" Gap:* The emergency motions to compel at D251 (Clerk's records of any automatic-stay notice) and D254 (income records) were neither granted nor set for hearing.
6. Failure to Consider Newly Filed Jurisdictional Evidence:
   a. *Federal Discharge Record:* D265 attached the Order of Discharge confirming the debt was extinguished July 2, 2025.
   b. *Lack of Standing:* The judgment is property of a federal bankruptcy estate and has been discharged.

c. *Concealment Proof:* D255 documents concealment of the federal facts throughout the appellate process.

Relief Requested (Verbatim)

WHEREFORE, Defendants respectfully request that this Court set aside and vacate the Orders D240, D241, D242, and D243, issued on December 4, 2025, and Final recorded Judgments D247 and D249 issued on December 8, 2025. Defendants further request that this Court stay all collection and garnishment efforts until the jurisdictional challenges in D211 (no response from Plaintiffs) and the allegations of Motion for Sanctions in D222 are fully adjudicated on the merits. The Defendants have already filed Motions for Hearing for D211 and D222, which remain outstanding. The Court also needs to take judicial notice of recent filings:

1) Filing Federal Bankruptcy Discharge and Final Decree of Plaintiff (December 26, 2025)
2) Emergency Motion to Dissolve Writ of Garnishment (December 25, 2025)
3) Notice Regarding Constitutional Impact of Appellate Orders with Consideration of Bankruptcy Record (D255, December 14, 2025)

Defendants expressly reserve the right to amend, supplement, or renew this motion as additional evidence or record materials become available.

Disposition

The motion was not ruled upon.

APPENDIX M – Violation of Automatic Stay

Motion to Vacate Judgment as Void for Violation of the Automatic Stay - Trial Court Doc. No. D181 (September 1, 2025)

[Omitted from this booklet-format appendix. This document is a party filing or record material that Rule 14.1(i) does not require to be reproduced; it remains part of the record of the proceedings below and is cited in the petition where relevant. It is omitted to keep the appendix within the 6-1/8 by 9-1/4 inch booklet format required by Rule 33.1 and to avoid reproducing voluminous record materials in the forty required copies. See 'Materials Omitted From This Appendix' at the end of this appendix. Petitioners will furnish it upon request.]

Note on Reproduction

Because of the length and space constraints applicable to a booklet-format appendix, the full text of this motion is not reproduced here. A summary of its substance appears below, followed by the section captioned "Relief Requested" reproduced verbatim. The motion is part of the record in the trial court proceedings below. Petitioners will furnish the complete motion, together with Exhibit A, promptly upon request of this Court or the Clerk.

Summary of Motion Filed

On September 1, 2025, Petitioners moved to vacate the judgments, orders, motions and notices entered in this case as void for violation of the federal automatic stay.

The motion stated that Respondent Nathaniel Chibuzor Keita filed a voluntary Chapter 7 petition on March 28, 2025, that the automatic stay remained

in effect until the case closed on August 7, 2025, and that Respondents never filed a Suggestion of Bankruptcy in any of the three courts then handling this litigation.

The motion then identified, court by court, every filing and order entered during the stay period. In the county court: the verified motion to disqualify Judge Lee, two notices of filing, the June 3, 2025 order denying disqualification, and the June 13, 2025 transfer order. In the Fifth District Court of Appeal: six filings by Petitioners, and five orders including the April 10, 2025 order to show cause and the May 1, 2025 order barring further pro se filings and disallowing a Reply Brief. In the Florida Supreme Court: seven filings and three orders.

The motion further argued that the August 12, 2025 per curiam affirmance and fee order, and the August 18, 2025 order denying discretionary review, though entered after the stay lifted, rest entirely on a record built during the stay, and are void on that basis under Eleventh Circuit authority holding that a judgment based on a void act is itself void.

Exhibit A to the motion set out the stay period, the text of 11 U.S.C. § 362(a), and the holdings of Borg-Warner Acceptance Corp. v. Hall, 685 F.2d 1306, 1308 (11th Cir. 1982) and In re Albany Partners, Ltd., 749 F.2d 670, 675 (11th Cir. 1984).

Relief Requested (Verbatim)

It is important to note that the Plaintiff has provided a wrongful place of residency and inflated income in sworn testimonies to all state courts. It is also important to point out that attempt by the Defendants to serve Plaintiff Nathaniel Keita through USPS Certified Mail at the address on record (8104 Summer Gate Court) was not successful because no such

person resided there. The inability to effect service at the address on record demonstrates that Plaintiff knowingly misled the Duval County Circuit Court, the Fifth District Court of Appeal, and the Florida Supreme Court regarding residence. The Plaintiff inflated his income by around 200 percent and 300 percent in rental applications with $72,000 and $99,000 as annual income, respectively, to wrongfully secure a lease with the Defendants.

In the Eleventh Circuit, all acts – judgments, orders, motions, notices, writs - taken in violation of the automatic stay are **void and without effect, not merely voidable**. See **Borg-Warner Acceptance Corp. v. Hall**, 685 F.2d 1306, 1308 (11th Cir. 1982); and **In re Albany Partners, Ltd.**, 749 F.2d 670, 675 (11th Cir. 1984). Because Plaintiff concealed his bankruptcy filing and permitted Duval County, the Fifth DCA, and SCOFL to proceed during a federal stay, this Honorable Court should:

1. Recognize that all proceedings involving Plaintiff between **March 28 and August 7, 2025**, are void under 11 U.S.C. § 362.
    a. Inform the Fifth District Court of Appeal and the Florida Supreme Court of the same.
2. **Vacate or declare void all acts – judgments, orders, motions, notices, writs - issued during that period** in Duval County, the 5DCA, and SCOFL between **March 28 and August 7, 2025**
    a. Alternatively, forward this concealment motion to the appropriate courts so that they may declare appropriate acts void.

b. Alternatively, certify that the appellate courts' refusal to address concealment constitutes a denial of due process, preserving the issue for federal review.

3. Restitution of all Duval County, 5DCA, and SCOFL costs and damages.
4. Recognition that Defendants' filings during the stay were wasted by concealment, entitling Defendants to damages and relief.
5. Any other relief the Honorable Court deems appropriate.

If the Honorable Judge Shayla Lee is not willing to grant the motion, the Defendants request a formal Hearing ASAP, as this impacts the future appeal process. In case the court chooses to have a Hearing, the Defendant needs Zoom access and time accommodation, as his current residence is in India.

Disposition

Post-disqualification, Judge Lee entered March 4, 2026, nunc pro tunc to October 17, 2025, and reproduced in Appendix P.

APPENDIX N – Motion to Set Aside

Supplement to Amended Motion to Set Aside and Vacate Final Judgments (Doc #118)

Trial Court Doc. No. D192 (September 9, 2025)

Note on Reproduction

Because of the length and space constraints applicable to a booklet-format appendix, the full text of this supplement is not reproduced here. A summary of its substance appears below, followed by the prayer for relief reproduced verbatim. The supplement is part of the record in the trial court proceedings below. Petitioners will furnish the complete document promptly upon request of this Court or the Clerk.

Exhibit A to the supplement is the complete bankruptcy filing in In re Nathaniel Chibuzor Keita, Case No. 3:25-bk-00977 (Bankr. M.D. Fla.). Excerpts of that filing are reproduced at Appendix I.

Summary of Motion Filed

This supplement, signed September 8, 2025, incorporated the grounds previously raised in the Amended Motion to Set Aside Final Judgment (Doc #118) and added evidence drawn from Respondent Keita's federal bankruptcy filings.

On jurisdiction, the supplement argued the Amended Complaint was filed twenty-three days after the security deposit claim, in violation of the statutory waiting period of § 83.49(3)(a), Fla. Stat., and that service of process was attempted at an address that was not Petitioners' place of residence.

On fraud, the supplement set out contradictions between Respondents' state court representations and their sworn federal disclosures in six areas: residence, income, ownership of real property, rental

expense, qualification for the lease, and the co-tenant status and testimony of Respondent Tompkins. It stated that Respondents reported annual income of $72,000 to $99,000 to obtain the lease, and swore to $24,000 to $26,000 in the bankruptcy schedules; that they represented ownership of real estate at trial, and disclosed no ownership interest in Schedule A/B; and that they claimed monthly rent of $1,650 to $2,200, and disclosed no lease obligation or rent expense in Schedules G and J.

On concealment, the supplement stated that Respondents filed the Chapter 7 petition on March 28, 2025 and never filed a Suggestion of Bankruptcy in the county court, the Fifth District Court of Appeal or the Florida Supreme Court, and that all three courts processed filings and entered orders between March 28 and August 7, 2025 while the stay was in effect. It further stated that the discharge entered July 2, 2025 under 11 U.S.C. § 524(a) permanently bars enforcement of the discharged debt.

On timeliness, the supplement argued that federal law tolled state deadlines during the bankruptcy, and that relief under Rule 1.540(b)(4) for void judgments and for fraud on the court is not subject to the one-year limit.

Relief Requested (Verbatim)

The August 29, 2024, Attorney's Fee Judgment (Doc. 123) and the August 1, 2024, Final Judgment cannot stand because they were secured and enforced through a pattern of fraud and concealment. The bankruptcy schedules filed by Plaintiff Nathaniel Keita on March 28, 2025, show that he owned no real property, possessed only minimal assets, reported wrongful addresses, claimed prior tenancy when just staying with parents, and reported income grossly

inconsistent with the claims he made to this Court. Those sworn disclosures expose Nathaniel's testimony at trial about real estate ownership and financial capacity as perjurious. His business, HENDIC LLC, did not exist for the length he claimed and does not appear viable based on the income reported in multiple courts and to government agencies. Just as fictitious anything (caselaw is not right), a fictitious name does not become a real legal business. These contradictions independently confirm perjury and fraud on the Court.

Lana Tompkins likewise testified falsely, claiming co-residency and tenant status when she had never applied, never paid rent, and had no standing under the lease. Together, their misrepresentations infected the findings of fact and inflated the damages calculations upon which both judgments rest. The concealment of Nathaniel's bankruptcy itself—and the continued garnishment and enforcement activity during the stay—rendered all proceedings void ab initio under 11 U.S.C. §§ 362(a) and 524(a), as confirmed by Eleventh Circuit precedent. These defects also demonstrate that the multiple defense motions dismissed without reasoning should in fact have been granted, as the bankruptcy record has now confirmed the truth.

Before these post-judgment revelations, the litigation was already jurisdictionally defective. Defendants were never properly served while abroad, depriving the Court of personal jurisdiction. Prior still, the Complaint was filed prematurely, in violation of statutory requirements, and both the Complaint and Amended Complaint contained fraudulent and wrongful information that Plaintiffs repeated under oath at trial.

APPENDIX N – Motion to Set Aside

Please note that Plaintiff Nathaniel Chibuzor Keita told the Defendants that, going forward, he would neither pay rent nor leave the property. A legal professional informed defendants that the Plaintiff was very violent and would beat them up somewhere with baseball bats.

From inception to enforcement, Plaintiffs defrauded Defendants and committed fraud on this Court. Each defect—improper service, premature filing, fraudulent pleadings, perjured testimony, concealment of bankruptcy, and enforcement in violation of federal law—independently compels relief under Rule 1.540(b)(3) and (4). Taken together, they reveal an unconscionable scheme that deprived Defendants of due process and induced this Court to enter judgments that are void and unenforceable. To preserve the integrity of the judicial process and enforce both Florida law and Federal Bankruptcy protections, the Final Judgment and Attorney's Fee Judgment must be vacated, all garnished funds returned, and such further relief granted as justice requires.

WHEREFORE, Defendants respectfully request that this Honorable Court:

1. Vacate the Final Judgment entered August 1, 2024, as void for lack of jurisdiction and as fraudulently procured
2. Vacate the Final Judgment for Attorney's Fees (Doc #123, entered August 29, 2024) as the derivative product of the August 1, 2024, judgment and as fraudulently procured
3. Order the release and return of all funds garnished or collected pursuant to the August 1, 2024, Final Judgment and the August 29, 2024, Final Judgment for Attorney's Fees (Doc #123), both of which are void, and independently, any

funds garnished or collected after March 28, 2025, are additionally void as violations of the bankruptcy stay and discharge injunction.

4. Grant such other and further relief as this Court deems just and proper.

If the Honorable Judge Shayla Lee is not willing to grant the motion, the Defendants request a formal Hearing ASAP, as this impacts the future appeal process. In case the court chooses to have a Hearing, the Defendant needs Zoom access and time accommodation, as his current residence is in India.

Disposition

No written order disposing of it appears on the trial court docket.

APPENDIX N – Motion to Set Aside

APPENDIX O – Ex Parte Post-Disqualification Inducement Letter to Judge Shayla Lee

Plaintiffs' Counsel, Mr. Kyle Peters, March 2, 2026 Letter to Judge Lee Requesting Entry of Orders After Deemed-Granted Disqualification outside the Court's Filing Portal

Kyle Peters, Esq.
Attorney at Law
221 N. Hogan Street, # 375
Jacksonville, Florida 32202
904.515.5735
KPeters@KPeterslaw.com
March 2, 2026
Via e-mail delivery to: tlevine@coj.net
The Honorable Shayla Lee

Re: Nathaniel Chibuzor Keita and Lana Paige Tompkins v. Palanikumar V. Gnanam and Mullairani Gnanam, Case No. 2024-CC-000687

Dear Judge Lee,

I represent the Plaintiffs in the above referenced action. On January 27, 2026, the Defendants filed a Motion to Disqualify the undersigned presiding judge. As of the date of this correspondence, no order has been entered granting or denying that motion. Defendants have now taken the position that the Motion to Disqualify is deemed granted by operation of law due to the absence of an order denying the motion within thirty (30) days of its filing. In light of that position, Plaintiffs respectfully request clarification as to whether the Court deems the Motion to Disqualify granted and will proceed with reassignment of the case, or the Court deems the Motion to Disqualify denied and intends to proceed with ruling

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OFFICE OF THE CLERK
SUPREME COURT, U.S.

on the pending motions and related matters. If the Court determines that the Motion to Disqualify is denied and that it retains authority to proceed, Plaintiffs respectfully request clarification regarding the status of the entry of written orders memorializing the Court's oral rulings from the October 17, 2025 hearing (as noticed in the Court's Order Setting Hearing, Doc. No. 203) and the January 8, 2026 exemption hearing. Although the Court granted Plaintiffs' motions to lift the stay, finalize garnishment, and related relief, written orders denying the Defendants' motions and the Claim of Exemption do not yet appear on the docket. Thank you for your attention to this matter.

KP LAW, PLLC

By: _____
Kyle Peters, Esq.
Enc.
CC:
MULLAIRANI GNANAM
PALANIKUMAR V. GNANAM
pk_gnanam@yahoo.com
Counsel of record for Wells Fargo.

APPENDIX O – Ex Parte Post-Disqualification Inducement Letter to Judge Shayla Lee

APPENDIX P – Judge Lee's Post-Disqualification NUNC PRO TUNC Orders

Judge Shayla Lee's Post-Disqualification Nunc Pro Tunc Orders, March 4, 2026

#	Description	Time
1	**Notice of Deemed Granted Motion to Disqualify Judge Shayla Lee – Effective February 27, 2026**	March 2, 2026
2	Order Denying Defendant's Claim of Exemption – D#299. Not NUNC PRO TUNC. This order ignores the lack of consideration for the threshold motion to strike for hearsay evidence from Opposing Counsel and zero consideration for Other Exemptions based on Federal Bankruptcy Laws. Petitioner was muted by the Judge during the entire Hearing.	11:29:55 AM
3	Order Striking Defendants' Motion to Correct or Expunge Improper Garnishment (DL164) — NUNC PRO TUNC October 17, 2025. – D#300	11:46:06 AM
4	Order Denying Defendants' Motion for Release of Excess Garnished Funds (DL170) — NUNC PRO TUNC October 17, 2025 – D#301	11:46:23 AM
5	Order Denying Defendants' Motion to Release Garnished Funds Post Bankruptcy and Misrepresentation (DL180) — NUNC PRO TUNC October 17, 2025 – D#302	11:46:39 AM

#	Description	Time
6	Order Denying Defendants' Motion to Terminate/Vacate Final Judgment as Void for Violation of the Automatic Stay (DL181) — NUNC PRO TUNC October 17, 2025 – D#303	11:47:01 AM
7	Order of Recusal (entered LAST — after all 5 substantive denials) – D#304 – Not NUNC PRO TUNC	11:51:01 AM
8	**Note on Item 5 (D#303).** This order finds that "during the pendency of the bankruptcy case (March 28, 2025 through August 7, 2025) the only movement that took place in this case was the entry of motions filed by the Defendant himself," and concludes that "the only party that may have conceivably violated an automatic stay, if it were applicable here, would have been the Defendant himself." The order does not address the Fifth District's April 10, 2025 Order to Show Cause or its May 1, 2025 Barring Order (Appendix E) and the related chain consisting of the June 9, 2025 order panel assignment order Appendix E-1, the SCOFL's June 13, 2025 Transfer order (Appendix E-2), or the Fifth District's June 25, 2025 order denying a stay (Appendix E-3) — each entered during that stay period. Nor does it address the Per Curiam Affirmance and the Order Granting Attorneys' Fees entered August 12, 2025 (Appendix B; Appendix C) en-	

	tered by 5DCA, or the SCOFL denying review entered August 18, 2025 (Appendix A), directly dependent on those orders and proceeding.

1. The disqualification took effect February 27, 2026. Notice reproduced at Appendix P-0.
2. Six orders were entered on March 4, 2026, between 11:29:55 a.m. and 11:51:01 a.m.
3. Four of the six are designated nunc pro tunc to October 17, 2025.
4. The Order of Recusal, Appendix P-6, was entered last, at 11:51:01 a.m., after the five substantive orders.
5. Appendix P-1 denies the Claim of Exemption. It does not address the threshold motion to strike or the exemptions claimed under federal bankruptcy law.
6. These orders followed two days after the correspondence sent to the Court outside the portal on March 2, 2026, reproduced at Appendix O.

APPENDIX P-0 – Notice of Deemed Granted Motion to Disqualify Judge

Trial Court Doc. No. D#297, dated February 27, 2026, docketed March 2, 2026

IN THE COUNTY COURT OF THE
FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
TRIAL COURT CASE NO.: 16-2024-CC-000687
APPELLATE CASE NO: 5D2024-2417
SUPREME COURT NO: SC2025-0657

NATHANIEL CHIBUZOR KEITA and
LANA PAIGE TOMPKINS,
Plaintiffs,

vs.
PALANIKUMAR V. GNANAM and
MULLAIRANI GNANAM,
Defendants.

NOTICE OF DEEMED GRANTED MOTION TO DISQUALIFY JUDGE

Defendants/Appellants/Petitioners, Palanikumar V. Gnanam and Mullairani Gnanam, appearing Pro se, hereby submit NOTICE OF DEEMED GRANTED MOTION TO DISQUALIFY JUDGE SHAYLA LEE, jointly.

COME NOW Defendants, Palanikumar V. Gnanam and Mullairani Gnanam, appearing pro se, and pursuant to Fla. Stat. § 38.10 and Florida Rule of General Practice and Judicial Administration 2.330(l), hereby provide Notice that the Motion to Disqualify filed on January 27, 2026, is Deemed Granted as a matter of law and hereby give notice of the following:

1. On January 27, 2026, Defendants filed and served their Verified Motion to Disqualify Judge Shayla Lee upon the Court and all parties of record.
2. Under Rule 2.330(l), the subject judge is required to rule on a motion for disqualification immediately, but no later than 30 days after service.
3. As of the date of this filing, more than 30 days have elapsed since the service of the motion on January 27, 2026, and no order denying the motion has been entered.
4. Pursuant to the plain language of Rule 2.330(l): "If the motion is not denied within 30 days of service, the motion is deemed granted, and the moving party may seek an order from the court directing the clerk to reassign the case."

5. Accordingly, by operation of law, the Motion to Disqualify is deemed granted.

WHEREFORE, Defendants respectfully request that the Clerk of the Court, or the Chief Judge, immediately reassign this case to a successor judge in accordance with Rule 2.330(l).

Defendants expressly reserve the right to amend, supplement, or renew this motion as additional evidence or record materials become available.

Dated: February 27, 2026
/s/ Palanikumar V Gnanam
Palanikumar V Gnanam, Defendant
/s/ Mullairani Gnanam
Mullairani Gnanam, Defendant
[Petitioners' note: The pro se footnote appearing on page 1, the parties' addresses and contact information, and the certificate of service are omitted.]

APPENDIX P-1 – Order Denying Claim of Exemption

[File stamp: Filing # 243032988 E-Filed 03/04/2026 11:48:16 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
-vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER DENYING DEFENDANT'S CLAIM OF EXEMPTION

THIS CAUSE having come to be heard before this court on Defendant Mullairani Gnanam's Claim of Exemption on January 8, 2026. The Plaintiffs were represented by counsel. The Defendant appeared pro se. After taking testimony from Defendant Mullairani Gnanam, and the Court being fully advised, it is

ORDERED AND ADJUDGED:

1. Defendant's Claim of Exemption is DENIED. DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

COUNTY COURT JUDGE

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P-2 – Order Striking Motion to Expunge

[File stamp: Filing # 243033132 E-Filed 03/04/2026 11:48:56 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
-vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER STRIKING DEFENDANTS' MOTION TO CORRECT OR EXPUNGE IMPROPER GARNISHMENT (DL164)

THIS CAUSE came before the Court on October 17, 2025 for a hearing on the Defendant's Motion to Correct or Expunge Improper Garnishment. The Plaintiffs were represented by counsel. The Defendants were present and represented themselves. After consideration of the evidence and argument presented, the Court makes the following findings:

- The Defendants claim that the writ of garnishment entered on November 5, 2024 on the garnishee Wells Fargo was improper.
- The Defendants' claim was not supported by any evidence.
- The Defendants' claim was based on an argument that the Plaintiffs should not have sought garnishment because Defendants made an offer to pay the judgment in full. The Defendants' offer to pay in full was conditioned on the Plaintiffs agreeing to hold the funds in escrow pending the outcome of the Defendants' appeal. The Plaintiffs declined to hold the funds in escrow. There is no requirement that the Plaintiffs accept a conditional payment.
- The Defendants further argued that the amount Wells Fargo set aside pursuant to the garnishment was more than the total amount of the final judgment entered and therefore was in violation of Florida Statutes 77.03 and 77.06. These statutes merely outline the process by which a plaintiff may obtain a writ of garnishment (77.03) and the obligations of a garnishee upon issuance of a

writ (77.06). There was no violation of either statute in the instant case.

- The Court does not find any evidence that the writ of garnishment issued on November 5, 2024 was improper.

Based on the above findings, the Defendants' Motion to Correct or Expunge Improper Garnishment is STRIKENED. /NUNC PRO TUNC October 17, 2025 / DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P-3 – Order Denying Release of Excess Garnishment

[File stamp: Filing # 243033212 E-Filed 03/04/2026 11:49:39 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER DENYING DEFENDANTS' MOTION FOR RELEASE OF EXCESS GARNISHED

FUNDS, INTEREST, AND FOR SANCTIONS AGAINST PLAINTFFS (DL170) THIS CAUSE came before the Court on October 17, 2025 for a hearing

on the Defendant's Motion for Release of Excess Garnished Funds, Interest, and Sanctions Against Plaintiffs. The Plaintiffs were represented by counsel. The Defendants were present and represented themselves. After consideration of the evidence and argument presented, the Court makes the following findings:

- The Defendants claim that the writ of garnishment entered on November 5, 2024 on the garnishee Wells Fargo was improper.
- The Defendants' claim was not supported by any evidence.
- The Defendants' claim was based on an argument that the Plaintiffs should not have sought garnishment because Defendants made an offer to pay the judgment in full. The Defendants' offer to pay in full was conditioned on the Plaintiffs agreeing to hold the funds in escrow pending the outcome of the Defendants' appeal. The Plaintiffs declined to hold the funds in escrow. There is no requirement that the Plaintiffs accept a conditional payment.
- The Defendants further argued that the amount Wells Fargo set aside pursuant to the garnishment was more than the total amount of the final judgment entered and therefore was in violation of Florida Statutes 77.03 and 77.06. These statutes merely outline the process by which a plaintiff may obtain a writ of garnishment (77.03) and the obligations of a garnishee upon issuance of a writ (77.06). There was no violation of either statute in the instant case.
- The Court does not find any evidence that the writ of garnishment issued on November 5, 2024

was improper, nor is there any evidence that the funds being held exceed the amount allotted in Florida Statute 77.19.

- Further the Court does not find that the Plaintiffs nor the Plaintiff's counsel have acted inappropriately in any fashion that would dictate the need for sanctions.

Based on the above findings, the Defendants' Motion for Release of Excess Garnished Funds, Interest, and for Sanctions Against Plaintiffs is DENIED. / NUNC PRO TUNC October 17, 2025 / DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P-4 – Order Denying Release of Funds Post-Bankruptcy

[File stamp: Filing # 243033363 E-Filed 03/04/2026 11:50:40 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER DENYING DEFENDANTS' MOTION TO RELEASE GARNISHED FUNDS POST-BANKRUPTCY AND MISREPRESENTATION (DL180)

THIS CAUSE came before the Court on October 17, 2025 for a hearing on the Defendants Motion to Release Garnished Funds Post Bankruptcy and Misrepresentation filed on docket line 180 of the court record. The Plaintiffs were represented by counsel. The Defendants were present and represented themselves. After consideration of the evidence and argument presented, the Court makes the following findings:

- This motion filed by the Defendants is very similar and somewhat duplicative of the prior motions filed on Docket lines 164 and 170, wherein the relief requested is the same.
- The Defendant further argues in the instant motion that the court should grant the relief requested because one of the Plaintiffs, Nathaniel Keita, filed for bankruptcy on March 28, 2025. The Defendant claims that the filing for bankruptcy is proof that Plaintiff Nathaniel Kieta lied during the rental application process for the property which was the subject of the initial claim filed in this case. The Defendant makes this claim with no proof to support the claim other than the assertion that the Plaintiff listed a different amount of income on the rental application than what is provided in the bankruptcy filing. (The Court does note that the rental application process would have taken place prior to the complaint filed in this case on January 9, 2024, and the bankruptcy filing was on March 28, 2025 over a year passed and the Defendant presented no proof of Mr. Keita's actual income at either time.)

- The Court notes that the final judgment in this case was entered on August 2, 2024. The Defendant then filed an appeal to the Fifth District Court of Appeals, which confirmed the trial court's decision on August 12, 2025. The Defendant then appealed to the Florida Supreme Court which declined to accept jurisdiction, denying the petition for review. This Court has not been presented any competent substantial evidence to overturn the mandate from the Fifth District Court of Appeal.
- The Defendants claim that the discrepancy in the incomes asserted by Plaintiff Nathaniel Keita (in separate matters which are not before this court) is somehow dispositive in the instant case. It is not. The final judgment was confirmed. The Fifth District remanded the case back to this Court's jurisdiction for the purpose of assessing attorney fees.
- Defendants have failed to provide any competent substantial evidence to support a reversal of the final judgment previously entered.
- The Defendant has failed to provide any competent substantial evidence that the garnished funds should be released.

Based on the above findings, the Defendants' Motion to Release Garnished Funds Post Bankruptcy and Misrepresentation is DENIED. / NUNC PRO TUNC October 17, 2025 / DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P-5 – Order Denying Motion to Vacate Final Judgment

APPENDIX P – Judge Lee's Post-Disqualification NUNC PRO TUNC Orders

[File stamp: Filing # 243033468 E-Filed 03/04/2026 11:51:28 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER DENYING DEFENDANTS' MOTION TO TERMINATE/VACATE FINAL JUDGMENT, ORDERS, MOTIONS AS VOID FOR VIOLATION OF THE AUTOMATIC STAY (DL 181)

THIS CAUSE came before the Court on October 17, 2025 for a hearing on the Defendants' Motion to Terminate/Vacate Final Judgment, Orders, Motions as Void for Violation of the Automatic Stay filed on docket line 181 of the court record. The Plaintiffs were represented by counsel. The Defendants were present and represented themselves. After consideration of the evidence and argument presented, the Court makes the following findings:

- This motion filed by the Defendants is very similar and somewhat duplicative of the prior motions filed on Docket lines 164 and 170, wherein the relief requested is the same.
- The Defendant further argues in the instant motion that the court should grant the relief requested because one of the Plaintiffs, Nathaniel Keita, filed for bankruptcy on March 28, 2025.

- The Defendant asserts that the bankruptcy filing triggered an automatic stay in the instant case. It did not.
- The filing of bankruptcy by one of the Plaintiffs has no bearing on the instant case wherein the final judgment has already been entered (August 2, 2024) and confirmed by the Fifth District of Appeals (August 15, 2025).
- While the Defendant accurately states that a filing of bankruptcy triggers an automatic stay prohibiting the commencement of continuation of judicial actions against the debtor, the Defendants misstate the effect on this instant case wherein the debtor is a plaintiff in this case and a final judgment has already been entered in his favor.
- The automatic stay implicated by the Plaintiff's bankruptcy filing has no effect on the instant case, and is not applicable.
- Furthermore, the Court notes that during the pendency of the bankruptcy case (March 28, 2025 through August 7, 2025) the only movement that took place in this case was the entry of motions filed by the Defendant himself, as well as notices from the Fifth District Court of Appeal and the Florida Supreme Court in response to filings in those respective courts by the Defendant himself. (The Court acknowledges the entry of an order on docket line 174 entered on June 3, 2025, which was in response to a motion filed by the Defendant which required a timely response.
- Therefore, the only party that may have conceivably violated an automatic stay, if it were appli-

cable here, would have been the Defendant himself. However, no automatic stay was applicable in the instant case.

Based on the above findings, the Defendants' Motion to Terminate/Vacate Final Judgment, Orders, Motions as Void for Violation of the Automatic Stay is DENIED. / NUNC PRO TUNC October 17, 2025 /

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P-6 – Order of Recusal

[File stamp: Filing # 243033610 E-Filed 03/04/2026 11:52:21 AM]

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-F

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS, Plaintiff,
vs
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM, Defendant.

ORDER OF RECUSAL

This cause came before the Court on the Defendant's Motion to Disqualify. Pursuant to Florida Rules of General Practice and Judicial Administration 2.330(l), it is,

ORDERED AND ADJUDGED:

1. I, Shayla E. Lee, as Presiding Judge of Division F of the County Court of Duval County, Florida, do

hereby recuse myself in this case. 2. That by separate order to be issued by the Honorable Robin E. Lanigan, Administrative County Judge, this case shall be reassigned to another Judge.

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Wednesday, March 4, 2026.

COUNTY COURT JUDGE

Copies to:... [Service List Omitted by Petitioners]

APPENDIX P – Judge Lee's Post-Disqualification NUNC PRO TUNC Orders

APPENDIX Q - Judge Brady's Orders

Orders Entered by Successor Judge Kristen Brooke Stephens Brady
March 24, 2026 through July 6, 2026

#	Order	Signed	E-Filed
1	Order Denying Defendant's Emergency Motion for Stay of Enforcement and Execution of All Orders Entered by Disqualified Judge (D#310)	Mar. 24, 2026 2:51:34 PM	Mar. 24, 2026 3:13:41 PM
2	Order Denying Defendant's Supplement to Emergency Motion to Dissolve Writ of Garnishment (D#266) — New Grounds Arising from Second Amended Answer and Void March 4, 2026, Orders (D#311)	Mar. 24, 2026 2:51:56 PM	Mar. 24, 2026 3:16:39 PM
3	Order Requiring Plaintiff to File Additional Information (D#318)	Apr. 13, 2026 9:38:08 AM	Apr. 13, 2026 11:34:04 AM
4	Order of Recusal (D#341)	July 6, 2026 10:49:49 AM	July 6, 2026 12:12:54 PM

[Petitioners' note: Orders 1 and 2 were signed twenty-two seconds apart.]

APPENDIX Q-1 – Order Denying Stay of Enforcement (D#310)

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

CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-P

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
-vs-
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM,
Defendant.

ORDER DENYING DEFENDANT'S EMERGENCY MOTION FOR STAY OF ENFORCEMENT AND EXECUTION OF ALL ORDERS ENTERED BY DISQUALIFIED JUDGE

This cause having come before the Court on the Defendant's Emergency Motion for Stay of Enforcement and Execution of All Orders Entered by Disqualified Judge and the Court having reviewed motion and the court docket, it is

ORDERED AND ADJUDGED

1. Defendant's Emergency Motion for Stay of Enforcement and Execution of All Orders Entered by Disqualified Judge is hereby **DENIED, as rulings were made prior to recusal.**

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Tuesday, March 24, 2026.

16-2024-CC-000687-AXXX-MA 03/24/2026 02:51:34 PM
/s/ Kristen Brooke Stephens Brady
KRISTEN BROOKE STEPHENS BRADY, COUNTY JUDGE

Filing # 244493736 E-Filed 03/24/2026 03:13:41 PM

[Service list omitted by Petitioners.]

APPENDIX Q-2 – Order Denying Supplement to Dissolve Writ (D#311)

IN THE COUNTY COURT
OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA
CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-P

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
-vs-
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM,
Defendant.

ORDER DENYING DEFENDANT'S SUPPLEMENT TO EMERGENCY MOTION TO DISSOLVE WRIT OF GARNISHMENT (D#266) — NEW GROUNDS ARISING FROM SECOND AMENDED ANSWER AND VOID MARCH 4, 2026, ORDERS

This cause having come before the Court on the Defendant's Supplement to Emergency Motion to Dissolve Writ of Garnishment (D#266) - New Grounds Arising from Second Amended Answer and Void March 4, 2026 Orders and the Court having reviewed motion and court docket, it is

ORDERED AND ADJUDGED

1. Defendant's Supplement to Emergency Motion to Dissolve Writ of Garnishment (D#266) - New Grounds Arising from Second Amended Answer

and Void March 4, 2026 Orders is hereby **DENIED**.

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Tuesday, March 24, 2026.

16-2024-CC-000687-AXXX-MA 03/24/2026 02:51:56 PM
/s/ Kristen Brooke Stephens Brady
KRISTEN BROOKE STEPHENS BRADY, COUNTY JUDGE
Brooke Brady, Judge

Filing # 244494314 E-Filed 03/24/2026 03:16:39 PM

[Service list omitted by Petitioners.]

APPENDIX Q-3 – Order Requiring Plaintiff to File Information (D#318)

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

CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-P

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
-vs-
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM,
Defendant.

ORDER REQUIRING PLAINTIFF TO FILE ADDITIONAL INFORMATION

This cause came before the Court on the Defendant's Omnibus Motion to Successor Judge; Motion for Rehearing and Reconsideration of March 24, 2026 Orders, Vacation of Void March 4, 2026 Post-Disqualification Orders, Mandatory Reconsideration of Prior Orders, and Request for Zoom Hearing; Motion Second Supplement to Motion for Sanctions Against Plaintiff's Counsel for Inducement Letter, Filing Affidavit of Hearsay Evidence, and Wrongfully Claiming No Knowledge of Bankruptcy; Motion to Compel Compliance with Sanctions Order. In consideration thereof, it is

ORDERED:

1. That the Plaintiff is hereby ordered to submit a response within 20 days of the date of this Order, failure to do so shall result in motions being granted.

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Monday, April 13, 2026.

16-2024-CC-000687-AXXX-MA 04/13/2026 09:38:08 AM
/s/ Kristen Brooke Stephens Brady
KRISTEN BROOKE STEPHENS BRADY, COUNTY JUDGE
Brooke Brady, Judge

Filing # 245822640 E-Filed 04/13/2026 11:34:04 AM
ACCEPTED: DUVAL COUNTY, JODY PHILLIPS, CLERK, 04/14/2026 11:20:42 AM

[Service list omitted by Petitioners.]

APPENDIX Q-4 – Order of Recusal (D#341)

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

CASE NUMBER: 16-2024-CC-000687-AXXX-MA
DIVISION: CC-P

NATHANIEL CHIBUZOR KEITA
LANA PAIGE TOMPKINS,
Plaintiff,
-vs-
PALANIKUMAR V. GNANAM
MULLAIRANI GNANAM
PALANIKUMAR GNANAM,
Defendant.

ORDER OF RECUSAL

It appearing that the undersigned should not preside over this cause, it is,

ORDERED AND ADJUDGED:

1. I, Brooke Brady, as Presiding Judge of Division P of the County Court of Duval County, Florida, do hereby recuse myself in this case.
2. That by separate order to be issued by the Honorable Robin E. Lanigan, Administrative County Judge, this case shall be reassigned to another Judge.

DONE AND ORDERED in Chambers at Jacksonville, Duval County, Florida, this Monday, July 6, 2026.

16-2024-CC-000687-AXXX-MA 07/06/2026 10:49:49 AM
/s/ Kristen Brooke Stephens Brady
KRISTEN BROOKE STEPHENS BRADY, COUNTY JUDGE
Brooke Brady, Judge
COUNTY COURT JUDGE

Filing # 251807327 E-Filed 07/06/2026 12:12:54 PM

[Service list omitted by Petitioners.]

APPENDIX R – Motion to Dissolve Writ

Defendants' Emergency Motion to Dissolve Writ of Garnishment Based on Lack of Standing and Statutory Inaccuracy

Trial Court Doc. No. D#266 (filed December 25, 2025 | original 5 pages)

Note on Reproduction

Because of the length and space constraints applicable to a booklet-format appendix, the full text of this motion is not reproduced here. A summary of its substance appears below. The motion is part of the record in the trial court proceedings below. Petitioners will furnish the complete motion, together with any accompanying exhibits, promptly upon request of this Court or the Clerk.

I. LACK OF STANDING — 11 U.S.C. § 541 (LEAD GROUND)

Plaintiff Nathaniel Keita filed Chapter 7 bankruptcy on March 28, 2025 (Case No. 3:25-bk-00977-BAJ). By operation of **11 U.S.C. § 541**, all legal and equitable interests in the underlying judgment became property of the bankruptcy estate. Because Plaintiff failed to schedule this judgment as an asset, it was never abandoned back to him. Consequently, Plaintiffs are no longer the "Real Parties in Interest" and lack standing to pursue the Writ of Garnishment.

II. STATUTORY INACCURACY IN THE GARNISHMENT TOTAL

The $39,131.00 sought is inflated by roughly $3,000 in post-judgment interest that accrued while the underlying funds were already frozen by Plaintiffs' own garnishment — charging interest on money the Defendants were legally barred from using to pay is a

due-process violation. The principal and fee components are independently infirm: as argued in D#211, the underlying judgment is void for violating the automatic stay (11 U.S.C. § 362), making the attorney's-fee award "fruit of the poisonous tree" — a void judgment cannot generate valid fees, and a plaintiff without standing cannot recover them.

III. DOUBLE RECOVERY

Defendants' records show Plaintiffs have already collected approximately $34,000 through prior garnishments, yet are now demanding $39,131.00 more against a $24,973.51 original principal — implying total collection exceeding $73,000 on a judgment that size. No accounting of the $34,000 already secured has been provided.

RELIEF REQUESTED:

Dissolve the writ (Fla. Stat. § 77.07); stay all collection pending resolution of the jurisdictional issues raised in D#211; order a sworn accounting of funds already collected; strike the disputed $3,029.01 in interest.

APPENDIX S – Defendants' Reply to Plaintiffs' Court-Ordered Response

The Supplemental Reply Chain to Plaintiffs' Response to Court-ordered Response — Plaintiffs' Binding Concessions, the Controlling-Authority Conflict, Omnibus Reply and the Impact on the Pending Writ of Garnishment

Trial Court Doc. Nos. D#321, D#322 and D#323 (filed May 15, 17 and 21, 2026)

Note on Reproduction

Because of the length and space constraints applicable to a booklet-format appendix, the full text of these three supplemental replies is not reproduced here. A summary of each appears below, together with the passages material to the questions presented reproduced verbatim. Material reproduced elsewhere in this appendix is cross-referenced rather than repeated. The replies are part of the record in the trial court proceedings below. Petitioners will furnish the complete filings promptly upon request of this Court or the Clerk.

1. The three supplemental replies were filed May 15, 17, and 21, 2026, and the Omnibus Reply on June 1, 2026, in reply to court-ordered Plaintiffs' Response.
2. The replies address three matters: concessions made in Plaintiffs' court-ordered response, the controlling authority on the reconsideration standard, and the effect of the disqualifications on the pending writ of garnishment.
3. Two Notices of Filing, D#330 and D#331, were filed June 10, 2026, as to correspondence sent to

the Court outside the portal on May 1 and June 4, 2026.

Related Filings in the D#320 Supplemental-Reply Chain

Doc. No.	Description	Filed
D#321	First Supplemental Reply — Plaintiffs' Binding Concessions	May 15, 2026
D#322	Second Supplemental Reply — Controlling Authority on Mandatory Reconsideration Standard	May 17, 2026
D#323	**Third Supplemental Reply — Judicial Disqualification and Its Direct Impact on the Pending Writ of Garnishment**	**May 21, 2026**
D#325	Omnibus Reply to Plaintiffs' Court-Ordered Response	June 1, 2026
D#330	Notice of Filing — Improper Correspondence (May 1, 2026 letter)	June 10, 2026
D#331	Notice of Filing — Improper Correspondence (June 4, 2026 letter)	June 10, 2026

I. First Supplemental Reply — Plaintiffs' Binding Concessions

(D#321, filed May 15, 2026)

Summary. The trial court's April 13, 2026 Order (D#318, reproduced at Appendix Q-3) directed Plaintiffs to file additional information within twenty days. Plaintiffs' counsel filed a 67-page Court-Ordered Response on May 1, 2026 (D#320). This reply identifies what that Response conceded, expressly

and by silence. Its central point is that in defending the March 4, 2026 orders, Plaintiffs' counsel conceded that both judicial disqualifications occurred, and argued only that their legal consequences are limited.

Concession on the Disqualification of Judge Shayla E. Lee (reproduced verbatim).

Plaintiffs' Response states at pages 12–13:

"The Defendants' argument fails because, even assuming disqualification occurred by operation of law, the March 4, 2026 Orders fall within the well-established ministerial-act exception and are therefore not void."

Plaintiffs do not argue that disqualification did not occur. They do not argue that the 30-day deadline under Florida Rule of General Practice and Judicial Administration 2.330(l) was not triggered. They do not argue that the motion to disqualify was timely denied. The concession is express: disqualification occurred by operation of law.

Concession on the Disqualification of Judge James A. Ruth (reproduced verbatim).

Plaintiffs' Response states at pages 14–15:

"Even if such a motion were later deemed granted, disqualification applies prospectively only (on orders entered after November 20, 2024) and does not disturb orders or a final judgment already entered."

Plaintiffs do not argue that disqualification did not occur. They do not argue that the 30-day deadline under Florida Rule of General Practice and Judicial Administration 2.330(l) was not triggered. The phrase "even if such a motion were later deemed

granted" is a concession that disqualification occurred. Both the mechanism and the fact are admitted.

The Ministerial-Act Characterization Does Not Appear in the Orders.

The six March 4, 2026 orders (D#299–D#304, reproduced at Appendix P-1 through P-6) do not contain the words "ministerial act." Not one of the six orders characterizes itself as a ministerial memorialization of a prior oral ruling. The ministerial-act exception is a post-hoc litigation defense raised for the first time in the May 1, 2026 Response. D#302 denies a motion grounded in the federal automatic stay under 11 U.S.C. § 362, and D#303 denies a motion grounded in the post-bankruptcy discharge — both requiring substantive federal legal analysis. Under Godin v. Owens, 275 So. 3d 700, 700–01 (Fla. 5th DCA 2019), "substantive changes in the trial court's ruling are not ministerial and are considered void."

The Five Unrebutted Facts Concerning the March 2, 2026 Letter.

Plaintiffs' counsel's letter of March 2, 2026 is reproduced at Appendix O. The reply identifies five facts the May 1 Response does not deny:

1. The letter was sent after the disqualification deadline expired;

2. It acknowledged the disqualification;

3. It identified the specific orders he wanted entered;

4. Judge Lee entered precisely those orders two days later;

5. The nunc pro tunc dates matched the hearing dates he identified. Silence on all five is a binding concession.

Concession on the Federal Jurisdictional Question.

Plaintiffs' counsel devotes three pages (pages 61–63) of the 67-page Response to the automatic stay and discharge injunction — the central federal jurisdictional issue in the case. Across the entire filing he does not cite a single federal authority permitting a state court to override, modify, or declare inapplicable a self-executing 11 U.S.C. § 362 automatic stay. The three controlling federal authorities — Kalb v. Feuerstein, 308 U.S. 433 (1940), Borg-Warner Acceptance Corp. v. Hall, 685 F.2d 1306 (11th Cir. 1982), and In re Albany Partners, Ltd., 749 F.2d 670 (11th Cir. 1984) — appear nowhere in the Response.

Concession on Fraud on the Court.

Plaintiffs' Response argues at pages 56–57 that the fraud claims are time-barred under Rule 1.540(b)(3), contending that "mere silence, without deceptive acts or a duty to disclose, does not constitute fraudulent concealment." By engaging the substance of the concealment allegation on the merits — disputing whether the acts were deceptive and whether a duty to disclose existed — Plaintiffs made a judicial admission that the claim is cognizable. The Response does not cite, distinguish, or engage Cox v. Burke, 706 So. 2d 43 (Fla. 5th DCA 1998), the controlling Fifth District authority establishing that an unconscionable scheme to improperly influence the court carries no time limitation.

Concession on Res Judicata.

Plaintiffs invoke res judicata and collateral estoppel at page 37, arguing that those doctrines "prohibit relitigation of issues already decided or that could have been raised in prior proceedings." The controlling standard requires that the identical issues were actually presented and actually adjudicated in the prior proceeding. Topps v. State, 865 So. 2d 1253, 1255 (Fla. 2004). Plaintiffs' counsel does not assert that the bankruptcy arguments were actually presented or actually litigated before the Fifth District Court of Appeal; he substitutes the phrase "could have been raised." The bankruptcy petition was not filed until March 28, 2025, after the appeal was fully briefed. Topps further holds that an unelaborated appellate order is not a decision on the merits for preclusion purposes absent a citation to authority or other statement showing the issue was considered. The Fifth District's per curiam affirmance of August 12, 2025 (Appendix B) contains no citation, no written opinion, and no statement addressing federal bankruptcy law.

II. Second Supplemental Reply — Controlling Authority on the Mandatory Reconsideration Standard (D#322, filed May 17, 2026)

Summary. This reply identifies a conflict of controlling authority on the question whether a successor judge must reconsider orders entered by a disqualified judge. Plaintiffs' counsel presented the trial court with non-binding Fourth District authority while omitting both the controlling Florida statute and binding Fifth District precedent. The trial court did not resolve the conflict.

Plaintiffs' Position (reproduced verbatim).

In their May 1, 2026 Response at pages 14–15, Plaintiffs' counsel argues:

"Rule 2.330(j) does not impose a mandatory obligation on a successor judge to vacate prior orders. Rather, it affords discretion to determine whether prior rulings should be revisited. Nothing in the rule converts that discretionary authority into a ministerial duty to vacate orders wholesale."

In support of that characterization, Plaintiffs' counsel relies on the word "may" appearing in Rule 2.330(j), citing Rath v. Network Mktg., L.C., 944 So. 2d 485, 487 (Fla. 4th DCA 2006) and Ognenovic v. David J. Giannone, Inc., 184 So. 3d 1135, 1137 (Fla. 4th DCA 2015). Both are Fourth District Court of Appeal decisions.

The Controlling Authority Not Cited.

Plaintiffs' counsel does not cite, reference, or distinguish **Florida Statute § 38.07**, which governs a court's obligation when a party petitions for reconsideration of orders entered by a disqualified judge. That statute provides that "such a petition shall be granted as a matter of right." The word "shall" is mandatory. The phrase "as a matter of right" eliminates judicial discretion.

Plaintiffs' counsel likewise does not cite, reference, or distinguish **Buckner v. Cowling, 135 So. 3d 383 (Fla. 5th DCA 2014)**, a Fifth District decision directly on point. In Buckner the court held that because the appellant filed a timely motion for reconsideration challenging the merits of orders entered by a disqualified judge, "upon remand the successor judge should grant that motion and reconsider those prior rulings."

The reply states the governing hierarchy as follows (reproduced verbatim):

Florida Statute § 38.07 — BINDING: reconsideration "shall be granted as a matter of right" — mandatory, no discretion;

Buckner v. Cowling, 135 So. 3d 383 (5th DCA 2014) — BINDING on this Court: where a timely motion for reconsideration is filed, successor judge "should grant that motion and reconsider those prior rulings";

Rath and Ognenovic (4th DCA) — NOT BINDING on this Court: reconsideration is discretionary.

This Court sits in the Fourth Judicial Circuit, within the jurisdiction of the Fifth District Court of Appeal. Buckner is binding on this Court, while Rath and Ognenovic are not. The appeal below was docketed in the Fifth District as Case No. 5D2024-2417.

"Plaintiffs' counsel has presented non-binding Fourth DCA authority to this Court while deliberately omitting the binding Fifth DCA authority and the controlling Florida statute. This Court is not at liberty to follow non-binding Fourth DCA discretionary authority when a Florida statute and binding Fifth DCA precedent mandate a different result. A ruling that follows non-binding authority over a Florida statute and binding Fifth DCA precedent constitutes reversible error on the face of the record."

The Cited Authority Is Also Factually Inapplicable.

Rath, Ognenovic and Fischer v. Knuck, 497 So. 2d 240 (Fla. 1986), each involved a voluntary recusal.

This case involves two disqualifications by operation of law under Rule 2.330(l) — an involuntary, automatic termination of judicial authority. Section 38.07 was written for disqualification, not voluntary recusal. Rath itself held that § 38.07 does not apply to voluntary recusals for bias or prejudice, which is why the Fourth District reached the discretionary standard at all. Moreover, Ognenovic quotes Rath for the proposition that the successor judge "must consider whether the rulings work an injustice on the party" — language in Plaintiffs' own cited authority that contradicts the claim of pure discretion.

The Timeliness Contradiction.

Plaintiffs argue at page 45 that Rule 2.330(j) requires a motion for reconsideration within thirty days of disqualification. D#312 was filed March 25, 2026 — twenty-six days after the February 27, 2026 disqualification, twenty-one days after the March 4, 2026 orders, and one day after Judge Brady's March 24, 2026 orders. It is timely under every calculation. Plaintiffs simultaneously argue that the March 4 orders are valid ministerial acts and that the thirty-day clock ran from February 27. Those positions cannot coexist: if the March 4 orders are valid, they are the triggering event; if the clock ran from February 27, the orders were entered after disqualification was already effective.

III. Third Supplemental Reply — Judicial Disqualification and Its Direct Impact on the Pending Writ of Garnishment (D#323, filed May 21, 2026)

Summary. This reply applies the conceded disqualifications to the writ of garnishment then pending. It argues that the writ rests entirely on orders entered

by judges who lacked authority, that the Claim of Exemption was never lawfully denied, and that Plaintiff Keita lost standing to enforce the judgment when it became property of the bankruptcy estate under 11 U.S.C. § 541. The garnishment timeline below is drawn entirely from the docket.

Event and Date	**Docket and Disqualification Status at Time of Event**
Ruth Recusal (Disqualification) — Original First Motion - Deemed Granted Filed June 27, 2024 – Disqualified July 27, 2024	D#61 – Filed based on Rule 2.330 Judge Ruth DISQUALIFIED
Ruth Disqualification Motion July 28, 2024	D#74 Judge Ruth Denied it a few hours before trial and continued work as usual. Denied access to the Defendant Palanikumar Gnanam access to the court through Zoom access. Note that Judge was already DISQUALIFIED on July 27, 2024.
Ruth Disqualification — Renewed Motion Deemed Granted by operation of Law Filed November 2024 – Disqualified on Dec. 20, 2024	D#159 Judge Ruth DISQUALIFIED for 2nd time. His judgements, orders, and actions are void ab initio.

APPENDIX S – Defendants' Reply to Plaintiffs' Court-Ordered Response

Event and Date	Docket and Disqualification Status at Time of Event
Writ of Garnishment Served on Wells Fargo Served November 6, 2024 – Issued Oct 31, 2024	D#155 Issuance – D#157 Return of Service DISQUALIFIED JUDGE Ruth ordered. He was disqualified on July 27, 2024.
Lee Disqualification – Denied Filed May 6, 2025	D#172 Judge Lee Denied it.
Lee Disqualification — Deemed Granted by Operation of Law Filed Jan 27, 2026 – Disqualified Feb. 27, 2026	D#290 Judge Lee DISQUALIFIED.
March 4 Orders Entered (D#299–D#304) — Nunc Pro Tunc Mar. 4, 2026	D#299–D#304 VOID — Issued POST-DISQUALIFICATION
D#299 — Order Denying Claim of Exemption Mar. 4, 2026	D#299 VOID — Issued POST-DISQUALIFICATION
D#304 — Order of Recusal (Lee) Mar. 4, 2026 11:51 AM	D#304 VOID — Issued POST-DISQUALIFICATION

The Collapse of Standing.

APPENDIX S – Defendants' Reply to Plaintiffs' Court-Ordered Response

The moment Plaintiff Keita filed for Chapter 7 bankruptcy on March 28, 2025, the judgment became property of the bankruptcy estate under 11 U.S.C. § 541, leaving him without standing to pursue it and Plaintiffs' counsel without standing to enforce it. By defining Judge Ruth's loss of jurisdiction as applying "prospectively only (on orders entered after November 20, 2024)," Plaintiffs admitted that the entire garnishment proceeding — including the Garnishee's Answer and the Final Judgment of Garnishment — was conducted before judges stripped of legal authority.

Relief Requested (Verbatim)

Based on the foregoing, Defendants respectfully request that this Court:

1. Take judicial notice of Plaintiffs' concession that both judicial disqualifications occurred, as set forth in their May 1, 2026 Court-Ordered Response at pages 12–15;

2. Declare the August 2024 Final Judgments void ab initio as having been entered after Judge Ruth's July 27, 2024 disqualification by operation of law;

3. Declare D#299 (Order Denying Claim of Exemption, March 4, 2026) and all associated post-disqualification orders void ab initio as orders entered by a disqualified judge outside the ministerial-act exception;

4. Dissolve the Writ of Garnishment as resting on void orders entered by disqualified judges, with no valid judicial authority sustaining enforcement and is being pursued by a party lacking legal standing under 11 U.S.C. § 541;

5. Order Wells Fargo Bank, N.A. to immediately release all garnished funds held in connection with this proceeding; and

6. Grant such further relief as this Court deems just and proper.

Defendants expressly reserve the right to amend, supplement, or renew this supplemental reply as additional evidence or record materials become available.

Dated: May 21, 2026

IV. Omnibus Reply — The Layered Structure of Relief (D#325, filed June 1, 2026)

Summary. The Omnibus Reply closes the supplemental-reply chain. Its concluding section states the architecture of Petitioners' position below: a primary ground that resolves the case entirely, followed by ten fallback grounds, each asserted as independently sufficient. Section XV is reproduced verbatim in full below, because the structure itself is the point — no single ruling below disposed of the case, and no single theory is load-bearing.

Section XV — Conclusion and Prayer for Relief (Verbatim)

This Court does not need to reach every argument in this Reply. The arguments are layered and cumulative. Any single layer is independently sufficient to grant complete relief. The primary and all fallback positions are simultaneously established on the face of this record. Mr. Peters has conceded the critical elements of each by silence.

1. The Primary Position – Voids Everything.

This court should disqualify Judge Ruth as of July 27, 2024 on the date D#61 was deemed granted — then this case is over. The trial conducted on July 30, 2024 was conducted by a judge whose authority had already terminated three days earlier. The Final Judgment entered in August 2024 is void. The garnishment proceeding — initiated October 31, 2024 under that void judgment — is void from inception. Every subsequent order falls as a dependent void. No further argument need be reached. The entire proceeding collapses at its foundation.

2. Fallback 1: If This Court Does Not Reach the Primary Position — Premature Filing Voids Subject Matter Jurisdiction.

The complaint was filed before the statutory preconditions for filing were satisfied. Subject matter jurisdiction never attached. A court without subject matter jurisdiction cannot award attorney's fees, cannot enter a final judgment, and cannot authorize a writ of garnishment. The fee awards, D#123 (August 29, 2024) and D#249 (December 4, 2025 appellate fees), fall immediately on this ground alone — without requiring any ruling on bias, discharge, or fraud. Defendants raised the premature filing defect no fewer than 23 times in their Amended Answer. Mr. Peters never addressed the jurisdictional consequence in any filing. That consequence is conceded.

3. Fallback 2: The Automatic Stay Voids the Foundational Garnishment Order.

The May 1, 2025 barring order was entered during the automatic stay period — March 28 through August 7, 2025. Under Borg-Warner Acceptance Corp. v. Hall, 685 F.2d 1306 (11th Cir. 1982), and Kalb v.

Feuerstein, 308 U.S. 433 (1940), actions taken in violation of the automatic stay are void ab initio — not merely voidable. The May 1 barring order of the 5DCA is the predicate for the garnishment enforcement proceedings. Remove it and the garnishment has no valid foundation regardless of any other ruling.

4. Fallback 3: The Discharge Injunction Permanently Extinguishes the Debt and Voids Every Post-August 7 Collection Act.

The July 2, 2025 bankruptcy discharge permanently extinguished the underlying debt under 11 U.S.C. § 524. Every collection act after that date — the December 4, 2025 Final Judgment of Garnishment (D#241), the December 17, 2025 sanctions order (D#260), and the second writ of garnishment — constitutes an act to collect a discharged debt in violation of the discharge injunction. Under Taggart v. Lorenzen, 139 S.Ct. 1795 (2019), there is no fair ground of doubt that these acts violated § 524. Each is void as a matter of federal law.

5. Fallback 4: Judge Lee's Judicial Bias Independently Voids the December 4 and December 17 Orders.

Independent of the discharge injunction, the December 4, 2025 Final Judgment of Garnishment and the December 17, 2025 sanctions order were entered by Judge Lee under conditions establishing judicial bias: the Final Judgment was pre-signed at 10:45 AM before the 3:00 PM hearing; the Show Cause matter was declared moot on the record then sanctioned thirteen days later; federal bankruptcy arguments were expressly refused on the record; and Mr. Gnanam was silenced for the entirety of the January

8, 2026 hearing. Each of these is an independent documented ground of bias establishing structural error.

6. Fallback 5: The Claim of Exemption Has Never Been Lawfully Denied — Immediate Release of Funds Required.

This is a direct ground for immediate relief before this Court. D#299 — the purported denial of the Claim of Exemption — was entered March 4, 2026, on the sixth day after Judge Lee's disqualification. It is void ab initio. D#275 — Mr. Peters' sworn answer to the Claim of Exemption — is an attorney-sworn affidavit filed by a person with no personal knowledge of the underlying bankruptcy facts. Under Zoda v. Hedden, 596 So. 2d 1225 (Fla. 2d DCA 1992), and Fla. Stat. §§ 90.604 and 90.801, it is legally incompetent. In D#320, Mr. Peters himself characterized D#275 as "merely a pleading device" carrying no evidentiary weight. A sworn answer disavowed as non-evidentiary by its own author is no answer at all. No valid denial exists. The garnished funds must be released on this ground alone — without reaching any other argument in this Reply.

7. Fallback 6: Fraud on the Court Reopens Every Motion Ruth Summarily Denied.

The fraud on the court established across Section IX of this Reply is not a peripheral argument. It is the lens through which every summary denial by Judge Ruth must be reexamined. Tompkins' own sworn trial testimony confirms the security deposit was returned — directly contradicting the damages premise of the Final Judgment. Keita swore to $99,000 annual income at trial and $22,000–$26,000 in his bankruptcy schedules for the identical period — a

$70,000–$77,000 discrepancy under penalty of federal perjury. Mr. Peters refused Defendants' $25,000 tender (D#139, D#146) to keep collection outside the bankruptcy estate. Fraud vitiates everything. Every motion Ruth denied without hearing — including D#211's seven grounds — must be reconsidered on a clean record.

8. Fallback 7: Plaintiff Lacks Standing Under 11 U.S.C. § 541(a)(1) — Chapter 7 Trustee Exclusive.

Keita filed Chapter 7 bankruptcy on March 28, 2025. Upon filing, the August 2024 judgment became property of the bankruptcy estate under 11 U.S.C. § 541(a)(1). Under *Parker v. Wendy's International*, 365 F.3d 1268 (11th Cir. 2004), and *Barger v. City of Cartersville*, 348 F.3d 1289 (11th Cir. 2003), only the Chapter 7 trustee has standing to pursue pre-petition claims. Keita did not list the judgment as an asset in his bankruptcy schedules. Judicial estoppel bars him from asserting it here. The term "Debtor-Plaintiff" Mr. Peters uses throughout D#320 does not exist in federal bankruptcy law. Keita is either a debtor — in which case the trustee controls the claim — or he is a plaintiff — in which case the bankruptcy schedules establish he has no cognizable asset to enforce.

9. Fallback 8: The December 17, 2025 Sanctions Order Against Defendants Is Void on Five Independent Grounds.

The December 17, 2025 sanctions order (D#260) is void on five independent grounds, each alone sufficient: the Show Cause matter was declared moot on the record before the sanction was imposed; the Final Judgment was pre-signed four hours before the

hearing it purports to follow; full compliance was on the record seventeen days before the hearing with only two actual errors across the entire record; Judge Lee expressly disclaimed jurisdiction over federal law on the record in violation of the Supremacy Clause; and the original filer defense — that Plaintiffs originated and filed these same documents in federal court — was never addressed. Defendants filed D#283 on January 15, 2026. Plaintiffs filed no response. Every ground stands uncontested.

10. Fallback 9: The Mandamus Cross-Court Contradiction Independently Seals the Garnishment Question.

Mr. Peters conceded in D#320 that D#275 — his sworn answer to the Claim of Exemption — was "merely a pleading device" carrying no evidentiary weight. That concession simultaneously destroys the Clerk's refusal to dissolve the writ in Case No. 16-2026-CC-003328. In that parallel proceeding, Clerk Jody Phillips maintains that the writ is valid and that no ministerial duty to dissolve exists — relying implicitly on D#275 as a valid sworn contest. But D#275 cannot be both a valid sworn contest in 003328 and a non-evidentiary pleading device in 000687. Mr. Peters is arguing irreconcilable positions in two courts simultaneously. His own judicial admission in D#320 is binding in both proceedings. Two courts. One concession. One result: the writ is dissolved, the Clerk's duty is mandatory, and the garnished funds must be released.

11. Fallback 10: D#83 Is a Jurisdictional Nullity and a False Certification — Ruth Disqualified Himself a Second Time in the Very Order Purporting to Deny Disqualification.

D#83 — Judge Ruth's three-sentence denial of D#74, entered at 10:19 AM on the morning of trial day (July 30, 2024) — is not a prior judicial determination that bars relief. It is void on five independent grounds, each alone sufficient. First, Ruth had no jurisdiction: D#61 was deemed granted July 27, 2024 — three days before D#83 was signed — making it void ab initio under Kalb v. Feuerstein, 308 U.S. 433 (1940). Second, no genuine review occurred: D#83 certifies thorough review of eight specific allegations while engaging with none of them by name. Third, Ruth exceeded his permitted scope: under Bundy v. Rudd, 366 So. 2d 440, 442 (Fla. 1978), the judge's inquiry is strictly limited to legal sufficiency on the face of the motion — a procedural insufficiency finding is outside that permitted scope entirely, and exceeding that scope is itself disqualifying. Fourth, no legal standard was applied: the Bundy standard — whether a reasonably prudent person would fear an unfair trial — does not appear anywhere in D#83. Fifth, no reasoned conclusion exists: eight specific fears received one collective three-sentence dismissal with zero engagement. The proof that D#83 is a false certification requires no extrinsic evidence and no credibility determination. It is entirely self-contained in the events of July 30, 2024: within hours of certifying that all eight fears were legally insufficient, Judge Ruth denied Zoom access to Mr. Gnanam, swept aside seven pending defense motions at Mr. Peters' verbal prompting without hearing, left Mrs. Gnanam alone against represented counsel, admitted Plaintiffs' unverified mold report while rejecting Defendants' compliant evidence, and signed a Final Judgment drafted by Mr. Peters. Every act is precisely what D#61 and D#74 alleged would happen. A judge who certifies thorough review

of eight fears, finds all eight legally insufficient, and confirms every one of them within hours on the same day did not review them. The certification is false. The conduct is the proof. Defendants have filed simultaneously a Motion to Declare D#83 Void Ab Initio and a False Certification, incorporated herein by reference. This Court is not being asked to second-guess a prior ruling. It is being asked to recognize that no judicial determination was ever made. There is no prior ruling to defer to. A nullity cannot bar relief. The fact that Judge Ruth was deemed disqualified by D#159, the November 20, 2024, is only further proof that the Judge recognized he was disqualified a long time ago.

Disposition

No order addressing D#321, D#322 or D#323 appears on the trial court docket. Judge Brady entered an Order of Recusal on July 6, 2026 (D#341, reproduced at Appendix Q-4) without ruling on any of them.

APPENDIX S – Defendants' Reply to Plaintiffs' Court-Ordered Response

APPENDIX T – Transcript Excerpts

Hearing Transcript Excerpts (October 17, 2025; December 4, 2025; and July 30, 2024 trial)

Transcript Snippets

The excerpts below are reproduced verbatim from the certified hearing transcripts. Line numbers are those of the original transcripts.

APPENDIX T-1: Transcript of October 17, 2025 Hearing

APPENDIX T-1-A – Court Rules Automatic Stay Does Not Apply

October 17, 2025 Transcript — page 60, line 19 through page 61, line 1; page 62, line 23 through page 63, line 19; page 65, lines 15 through 20

The trial court's ruling that the federal automatic stay does not apply. Wrongfully states that Mr. Keita is not the debtor. The evidence provided in Bankruptcy Court was extremely important and demonstrates the Fraud on the court. The court has ignored requests for production of documents from Mr. Keita and Ms. Tompkins from the beginning of the case (see Appendix K).

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is also denied. Docket Line 181 is a motion to vacate judgment orders, motions as void for valid -- for violation of the automatic stay. As I've already indicated when you were speaking about this previously, the automatic stay in bankruptcy proceedings does not apply to this particular case wherein Mr. Keita is not the debtor.

Page 61

1 So --

Page 62

23 MR. GNANAM: I have --
24 THE COURT: -- in the automatic state
25 proceedings of the bankruptcy that applies to your

Page 63

1 case. Nothing. Your case --
2 MR. GNANAM: I'll give you the case law, Your
3 Honor.
4 THE COURT: -- from his is bankruptcy
5 proceedings, the stay issued in his bankruptcy
6 proceedings does not affect your case at all. So
7 the DCA and any rulings made by them in the Florida
8 Supreme Court while your appeal was going on, have
9 nothing to do with the bankruptcy stay.
10 Those orders are still valid and enforceable
11 and I, as the lower court to all of the courts that
12 we are speaking on am not going to upset years --
13 100s of years of precedent. I know where in the
14 totem pole I lie, and I'm telling you that the
15 District Court of appeals have already entered,
16 which are proper because the stay in the bankruptcy
17 had nothing to do with your case.
18 The motion to vacate judgment orders motions as
19 void for violation of the automatic stay is denied.

Page 65

15 MR. GNANAM: The information in the bankruptcy
16 court is important for me in -- in my case and what
17 you're saying is that I don't need to have access to
18 that case information that I don't get to present
19 that information.
20 THE COURT: That's what I'm saying.

APPENDIX T-1-B – Judge Demands Proof of Which Court Statement was False

October 17, 2025 Transcript — page 22, line 22 through page 23, line 8

The trial court's treatment of the contradiction between Respondent's state and federal sworn statements.

Page 22

22 THE COURT: -- it happened with multiple people
23 throughout. I'm asking you to tell me how you know
24 that either in November or in March, what he said in
25 November was a lie or what he said in March was a

PAGE 23 — [THE COURT continuing]

1 lie. Because I you just telling me that he said
2 something different, he may have said something
3 different.
4 How do you know that, that was not the truth?
5 That in November it was this, and then in March it
6 became that? How do -- where's your proof that
7 there is a contradiction or that he lied to one of
8 those entities?

APPENDIX T-1-C – Judge Lee Finds No Duty to Disclose the Bankruptcy

October 17, 2025 Transcript — page 108, line 19 through page 109, line 15

The trial court's ruling that Plaintiffs had no obligation to disclose the bankruptcy proceeding, and the award of appellate attorney's fees.

PAGE 108 — [MR. GNANAM continuing]

19 So right now I believe he asked for 10 --
20 $10,860 dollars, but the reason -- one of the
21 primary reason this is not correct is because of a

22 motion that you actually denied and you -- you get
23 upset if I say that is because of violation of 362.
24 11 USC 362 and 11 USC 524 because of this violation
25 where he has not disclosed this information to us.

PAGE 109 — [MR. GNANAM continuing]

1 That is actually not correct. Act on -- on the
2 part of the -- now this specifically is part of the
3 Appellate court process. It's appeal process. It
4 happened in Appellate Court. So that is our point
5 and the bankruptcy conc -- conc -- concealment is
6 something I've already mentioned. That's our
7 problem.
8 THE COURT: Okay. As the court has already
9 indicated, there is no obligation that the
10 Plaintiffs to disclose a bankruptcy proceeding. So
11 I do not find that there's anything inappropriate by
12 them not disclosing that to you.
13 So based on that, the Plaintiff's motion for
14 award of Appellees attorney's fees and costs will be
15 granted. I do find that the amount of hours, 39.5

APPENDIX T-1-D – Judge Lee Agrees Plaintiff made Contradictory Statements

October 17, 2025 Hearing Transcript — page 51, lines 15 through Page 52, line 12

The trial court states that Petitioners have proven Plaintiff made contradictory statements between the trial court and the bankruptcy court, but then the Judge requires proof that the statement made to the trial court was the false one. The motion to compel documents from Respondents is outstanding from before the trial (Appendix K).

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15 The only thing that you have proven to the

16 court is that Mr. Keita made contradictory
17 statements and the trial court and bankruptcy court.
18 However, a contradiction is a contradiction. It
19 does not tell me definitively that Mr. Keita did not
20 make 72000 and $99,000 when he put that on your
21 application.
22 What it says to me is that he told the
23 bankruptcy court something different. You have to
24 provide me proof that Mr. Keita actually lied to
25 you, not to a bankruptcy court. Do you understand

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1 what I'm saying to you? That you presenting
2 evidence that Mr. Keita told you that his income was
3 72000 and 99,000 in November of 2024 unless you can
4 provide me with definitive proof that you know that
5 Mr. Keita didn't make that amount of money in
6 November.
7 I don't understand why we are continuing to
8 discuss issues that were already handled in the
9 District Court of Appeals because that is not the
10 purpose of today's court proceeding. Mr. Gnanam, I
11 don't know how much clearer I can be with you about
12 this.

APPENDIX T-1-E – Judge Lee on Unscheduled Judgment as Property of the Estate

October 17, 2025 Hearing Transcript — page 61, lines 2 through 25

Page 61

2 MR. GNANAM: But -- but there is a -- may --
3 may I, Your Honor. There is also a discharge
4 injunction, Your Honor. The discharge in --
5 injunction has an impact on all claims because the
6 bankruptcy happens in a way -- manners where the
7 assets of the person who's filing for bankruptcy

8 seems to go to a trustee. Okay.
9 All liabilities are measured, payments that
10 can be made by this person in future are measured
11 and then a judgment is received. It's a trust --
12 trustee that owns the things for some period of
13 time.
14 When the trustee hands it -- hands it over
15 during the discharge, he's basically discharges this
16 particular, because although the judgment was there,
17 Mr. Keita never actually put this judgment in his
18 bankruptcy petition. He put the -- he didn't do it,
19 didn't do it because did --
20 THE COURT: Again, Mr. Gnanam, he haven't paid
21 the judgment. How can he put something into a
22 bankruptcy proceed that he doesn't have? You didn't
23 pay the judgment. He doesn't have it.
24 MR. GNANAM: Well, he garnished it. He
25 garnished it.

APPENDIX T-1-F – Judge Lee on the Sworn Schedules

October 17, 2025 Hearing Transcript — page 47, lines 1 through 13

Petitioner states that Plaintiff swore in the bankruptcy court that he had no rental obligation and no rental expense, contrary to the rental payments at issue in the trial court and the incremental rent judgment of $1800.

Page 47

1 provide it and that's what I say.
2 Why -- that makes me think he can pay 1,500
3 rent for rent. Would you not believe that if you
4 paid 2000 plus dollars. Then in the bankruptcy
5 court he says schedules, he said he sworn schedules,
6 there's no rental obligation and no rental expense.
7 This is in the bankruptcy so these two people

8 -- I can't [should be 'can'] even show it is Nathaniel's handwriting,
9 Your Honor. He says, this is sworn statement to the
10 bankruptcy court in the federal court. Okay. Just
11 sitting across the street or close by to your court,
12 he's saying his rental expense never existed. He
13 never actually paid that much. Okay.

APPENDIX T-1-G – Judge Lee Cuts Off Petitioners Arguments

October 17, 2025 Hearing Transcript — page 10, lines 13 through 25

Page 10
13 THE COURT: Just a second -- just a second.
14 Mr. Gnanam, I'm sorry, I'm going to interrupt you
15 only because one, all of you all have been here for
16 this whole process. I also, as a Judge, have also
17 researched and went through all of the -- the -- the
18 procedural history of the case and I don't want us
19 to waste time because we do have limited time. I
20 have other cases on my docket this afternoon.
21 MR. GNANAM: Okay.
22 THE COURT: So I want you to go straight to
23 your arguments for each motion, and let's go there
24 because this information that you have on the screen
25 currently, I'm well aware of, and I believe the

APPENDIX T-1-H — Plaintiffs' Counsel Drafts the Order and Confirms the Safe Deposit Boxes Are To Be Released

October 17, 2025 Hearing Transcript — page 85, lines 1 through 23

Plaintiffs' counsel states that Plaintiffs make no claim to the safe deposit boxes, confirms that the order directs their release, and undertakes to draft and circulate the proposed order. That order became the Final Judgment of Garnishment entered December 4, 2025, reproduced at Appendix G-1, and this exchange became its **Adjudication Clause E**.

Page 85

MR. PETERS: I'll update it just so it's very clear on those points, and then address some of the new things and circulate with Mr. Bernstein to make sure that he can see, you know, to his satisfaction. I don't think we had that finalized yet, but I'll make sure we're on the same page before sending it back to Your Honor.
THE COURT: And just to be clear, Mr. Peters, the Plaintiffs are -- are not making any claims towards whatever is in the safe deposit boxes. Is that correct?
MR. PETERS: Right.
THE COURT: Okay. That's --
MR. PETERS: Yeah, that's right. The -- the order specifically says those are to be released and -- and the other accounts as well, to the extent they don't satisfy that -- that judgment.
THE COURT: Okay. All right. So then I will grant that motion and yes, Mr. Peters, if you can send me an updated proposed order, make sure that Mr. Gnanam has an opportunity to review it --
MR. PETERS: Yep.
THE COURT: -- and submit that to the court.

APPENDIX T-1-I — Trial Court's Ruling That the Automatic Stay Does Not Reach This Case

October 17, 2025 Hearing Transcript — page 36, line 9 through page 37, line 11

APPENDIX T – Transcript Excerpts

The trial court states its reasoning for holding 11 U.S.C. § 362 inapplicable. The case was in Appellate court during the entire Bankruptcy period. There are no judgments or rulings in any appellate court that factor the actions in the Bankruptcy court.

Page 36

What you were stating is not correct, the automatic state that's enforced under -- under 11 USC Section 362, the automatic state applies to those that are recovering a claim against the debtor. The debtor in that case that bankruptcy was Mr. Keita. So that automatic state only applies to someone trying to get money from Mr. Keita. It does not apply, and I don't see anything in the US Constitution or statutes or codes that says that Mr. Keita cannot proceed in cases where he is owed money from someone while he is in bankruptcy, that is the difference. You are saying that all proceedings must be halted because of the bankruptcy, and that is absolutely in direct contradiction of the bankruptcy law. Mr. Keita is the Plaintiff in your case,

Page 37

meaning he sought to recover a debt from you. That is a complaint that he filed. The bankruptcy proceedings do not say complaints that were filed by the debtor. It's to protect the debtor from those that are trying to collect a debt from him, not those that owe him. So I'm not understanding why it is that you think that the 5th DCA and the Florida Supreme Court would've done anything improper by handling the appeal for your case while Mr. Keita was separately going through bankruptcy court.

APPENDIX T-1-J—Primary Petitioner Muted

October 17, 2025 Hearing Transcript — page 31, line 20 through page 32, line 1; and page 32, lines 20 through 23; and page 42, lines 19 through 22

The trial court mutes the primary Petitioner during argument and thereafter controls when he may speak.

Page 31

20 THE COURT: I've muted Mr. Gnanam because I've
21 asked Mr. Gnanam no less than four times this
22 morning to not talk over me when I am talking. Mr.
23 Gnanam, if you want to continue to represent
24 yourself, I'm going to ask you to follow the rules
25 of the court otherwise, I'm going to look to Ms.

Page 32

1 Gnanam to continue on behalf of the Defendants. . .
20 this court. Mr. Gnanam, I'm going to unmute you for
21 the sole purpose -- the sole purpose of you showing
22 me where you think a default final judgment of
23 garnishment was entered.

Page 42

19 Are we clear, Mr. Gnanam? Mr. Gnanam, you are
20 muted. So if you are talking, I cannot hear you.
21 Are we clear now Mr. Gnanam on how we are
22 proceeding?

APPENDIX T-1-K — The Trial Court on Ex Parte Communications

October 17, 2025 Hearing Transcript — page 111, line 22 through page 112, line 19

Petitioner states that Plaintiffs' counsel has previously sent proposed orders directly to the court. The

trial court responds that it does not engage in ex parte communications with either side.

Page 111
22 THE COURT: All right. Mr. Gnanam, you want to
23 address the court?
24 MR. GNANAM: Yes. In -- in the previous
25 situations, this hasn't happened. I wanted to thank
Page 112
1 you to say, hey, make sure you send it to this guy
2 also. In all situations prior to this, he has
3 emailed it straight to them or to the court, or he
4 has put the proposed orders in and I did -- I
5 thought people are supposed to consult, but just
6 signing these orders with -- with unreasoned orders
7 just doesn't make sense, but it's too late for me to
8 keep fighting these things, but I did want to
9 mention them.
10 THE COURT: Well, Mr. Gnanam, I -- I appreciate
11 you mentioning that, Mr. Gnanam, I'm very -- I'm –
12 this court has been very patient and Mr. Gnanam,
13 you've also directly emailed my assistant several
14 times without copying the Plaintiffs and had to be
15 reminded that I don't do ex parte communications
16 with either side and I have maintained that standard
17 throughout these proceedings.
18 I do not communicate with one side without the
19 other. My assertion to Mr. Peters was just a common

APPENDIX T-2: Transcript of December 4, 2025 Hearing

APPENDIX T-2-A – The Judge says we live in the United States of Florida

December 4, 2025 Transcript — page 32, lines 7 through 14

The "United States of Florida" statement.

PAGE 32 *— [THE COURT continuing]*
separately from federal courts. That is because we live
in the United States of Florida (sic). I do not have
time to properly explain exactly how the basics of
judicial structures work in the state of Florida, but it
is absolutely true that what is happening in bankruptcy
court typically has no bearing on what is happening in
county court, other than they can tell me to halt my
proceedings until they are finished doing something.

APPENDIX T-2-B – Bankruptcy Filings Not Automatically Impugned

December 4, 2025 Transcript — page 32, lines 16 through 24

The trial court's ruling that bankruptcy court filings are not automatically impugned to the county court case.

Page 32
THE COURT: And again, the distinction that
the Court is making to you, sir, is that what is filed
in bankruptcy court is not automatically impugned to
your case in county court. That was the only thing that
the Court was trying to distinguish to you because you
indicated that the plaintiffs filed this paperwork
first, and I'm explaining to you that I'm only dealing
with things that are filed in my case here in county
court, not what is filed in bankruptcy court.

APPENDIX T-2-C – Federal Bankruptcy Has No Bearing on County Court

December 4, 2025 Transcript — page 27, line 17 through page 28, line 13

The trial court's statement that federal bankruptcy proceedings have no bearing on the county court case.

Page 27

THE COURT: Mr. Gnanam, I'm going to explain this to you one more time. I sit in a county court in the state of Florida, Duval County Court. My court is completely separate from any federal court where bankruptcy filings are had, completely separate matters. What is filed in bankruptcy court in a federal case typically has no bearing on my county court case. If you are telling me that the -- that the plaintiffs, in filing their bankruptcy case, included information in

Page 28 — [THE COURT continuing]

the bankruptcy court that the bankruptcy court needed in order to handle a bankruptcy case, explain to me why it is that you believe that that information has any bearing on this county court case? You are the individual that took that particular filing and placed it into my county court file, which is a violation because it contains their personal confidential information. You are trying to relate to me that they disclosed it first, and I am telling you that you cannot compute what is in a bankruptcy filing in a federal court completely separate from county court to the county court. They are two

13 separate cases. They have two separate case files.

APPENDIX T-2-D – Judge Lee Florida State Law Controls; Petitioner's Response

December 4, 2025 Hearing Transcript — page 30, lines 11 through 18

The trial court states that Florida state law is what controls in that court, and Petitioner responds that Federal law always applies.

Page 30

11 · · · · · THE COURT: · Because it's not -- it's not in
12 · compliance with Florida state law. · So if your opinion
13 · is not in compliance with Florida state law, sir, it
14 · doesn't control or rule anything. · The only thing that
15 · controls and rules in this court is Florida state law.
16 · And so if you're saying --
17 · · · · · MR. GNANAM: · Federal law always applies, Your
18 · Honor.

APPENDIX T-2-E – Plaintiff Contradiction is Okay because it is not State Court

December 4, 2025 Hearing Transcript — page 32, line 16 through page 33, line 11

Page 32

16 · · · · · THE COURT: · And again, the distinction that
17 · the Court is making to you, sir, is that what is filed
18 · in bankruptcy court is not automatically impugned to
19 · your case in county court. · That was the only thing that

20 · the Court was trying to distinguish to you because you
21 · indicated that the plaintiffs filed this paperwork
22 · first, and I'm explaining to you that I'm only dealing
23 · with things that are filed in my case here in county
24 · court, not what is filed in bankruptcy court.
25 · · · · · MR. GNANAM: · Well, you need -- you never made

Page 33

·1 · such a position that you have clear to me or to this
·2 · particular case or to anybody that I'm aware of. · No
·3 · state body in the state actually tells you, you know,
·4 · filings only here matters. · If you say that it's in the
·5 · Court, people can say one thing in one state court and
·6 · go to another state court and say something. · And you
·7 · said that also is okay. · No, those things, in my
·8 · opinion, are not okay.
·9 · · · · · THE COURT: · Bankruptcy court is not a state
10 · court. · Bankruptcy court is not a state court.
11 · Bankruptcy court is not a state court.

APPENDIX T-2-F — Petitioner's Statement that Retaliation is the Origin of the Show Cause Motion

December 4, 2025 Hearing Transcript — page 17, line 21 through page 18, line 15

Petitioner states that Plaintiffs' counsel raised the confidential-information issue only after the Emergency Amended Motion to Vacate D#211 based on 7 jurisdictional grounds Fraud on Court, Automatic Stay, and Discharge injunction was filed.

Page 17

21 The other key part of this whole thing is
22 that, at the -- a point at which I filed the Emergency

Motion to Vacate, as soon as they completed the file and
it was filed, I received an email from Mr. Peters, and this email was pretty stern. He said, you are

Page 18

disclosing information about it and -- about his client and that I need to redact it. And he also said, without
working on the proposed orders, you have been working on
the emergency motion, and I am now going to -- and I am
now going to file this with the Court. It is a
retaliatory motion at that point in time. So until that point in time, he hadn't done it.
For example, I had previously filed the same
bankruptcy report with information, but after listening
to Your Honor in the hearing where you said, where is my
evidence? Where is my evidence, I documented it clearly
for you and I presented it to you. Once he saw that
presentation, he took up a retaliation -- retaliatory
approach to hurt us, so this whole thing was
retaliatory.

APPENDIX T-2-G — The Show Cause Is Declared Moot and Sanctions Are Imposed

December 4, 2025 Hearing Transcript — page 38, line 25 through page 39, line 5; page 42, lines 15 through 20; and page 43, lines 1 through 6

The trial court rules that the Order to Show Cause is moot because the violations have been remedied, then grants Plaintiffs' request for sanctions on the same matter and directs Plaintiffs' counsel to submit

a proposed order. The original source document belongs to the Plaintiffs and within their control.

Page 38

25 the Court rules as follows: The Order to Show Cause at

Page 39

1 this time is moot because the issues that were
2 previously at issue -- because the violations that were
3 previously at issue have been remedied. The plaintiffs
4 have asked for sanctions as to the defendant for the
5 violations.

Page 42

15 So therefore, going back to the Court's
16 ruling, the issue as to whether or not I need to issue
17 the show cause is moot because these violations have
18 been remedied. I do find that the defendant was placed
19 on notice more than a year ago that he was filing
20 confidential information.

Page 43

1 Therefore, I am going to grant the plaintiff's
2 request for sanctions. Five hours of work at a rate of
3 $275 an hour, which is a total of $1,375 in sanctions.
4 That will be the ruling of the Court.
5 Mr. Peters, if you'll submit a proposed order,
6 I would greatly appreciate it.

APPENDIX T-3: Trial Court July 30, 2024 Trial Transcript

1. Primary Petitioner Palanikumar Gnanam was not allowed to attend the Trial by Judge James Ruth. Multiple requests and reconsideration for Zoom attendance were denied.

a. The Judge did this after denying a Motion to Disqualify that raised concerns about fairness on the day of the trial. Additionally, he failed to address a Rule 2.330 motion filed on June 27, 2024.

2. Seven (7) pending motions were denied by a single order containing one operative line: "The Defendants' Motions are hereby DENIED." No motion is separately addressed and no finding is stated. Reproduced at Appendix F-2.

3. When Judge Ruth presided over the trial, he was already deemed disqualified by a motion based on Rule 2.330 filed on June 27, 2024. His disqualification was deemed granted on July 27, 2024, by operation of law.

4. Judge Ruth denied a motion to disqualify him a few hours before the trial, on the same day of the trial. The processing was completed by the core system only on the next day.

APPENDIX T-3-A – Income Testimony

July 30, 2024 Trial Transcript — page 51, line 17 through page 52, line 13

Respondent's sworn income testimony establishing the 376% discrepancy with the federal bankruptcy records. The Witness is Mr. Keita.

Page 51

BY MR. PETERS:

Q. *All right. Another allegation made was that your income was misstated somehow. Can you explain at all?*

A. *In an application, one I might have put gross, one I might have put net. It might have been about*

23 $7,000 difference.
24 ***Q.*** *Okay. So it says your annual income on your*
25 handwritten application, $72,000, and then on the Zillow

Page 52 — [MR. PETERS continuing]
1 application, it says your income was 8,250 a month. It
2 doesn't have a yearly thing. 7,500 for one -- for
3 Hendic and then real estate should 750.
4 Is there any explanation as to why that would
5 be inconsistent or wrong?
6 ***A.*** *Like I said, the only difference would be*
7 between gross and net. The $750 a month that I get from
8 real estate, they claim that they saw no -- no files or
9 any paperwork that I've ever owned any other
10 properties --
11 THE COURT: Okay. What's the next question?
12 THE WITNESS: -- which I do.
13 BY MR. PETERS:

APPENDIX T-3-B – Claim of $750 Monthly Rental Income

July 30, 2024 Trial Transcript —page 52, line 1 through 13

Respondent's claim of rental income of $750 per month from real estate, contradicted by his federal bankruptcy filings in which no such asset was disclosed. See page 52, lines 7 through 12. Answers are provided by Mr. Keita.

Page 52 — [MR. PETERS]
1 application, it says your income was 8,250 a month. It
2 doesn't have a yearly thing. 7,500 for one -- for
3 Hendic and then real estate should 750.
4 Is there any explanation as to why that would
5 be inconsistent or wrong?

A. Like I said, the only difference would be between gross and net. The $750 a month that I get from real estate, they claim that they saw no -- no files or any paperwork that I've ever owned any other properties --
THE COURT: Okay. What's the next question?
THE WITNESS: -- which I do.
BY MR. PETERS:

APPENDIX T-3-C – Return of Security Deposit

July 30, 2024 Trial Transcript — page 46, line 13 through page 47, line 9

Page 46

Q. Okay. So now I'm showing you is Plaintiff's Exhibit J. Do you recognize what this document is?
A. Yes. It is the --
THE COURT: Why don't you give me everything you going -- you going -- everything you plan on giving me just give me the stack so you don't have to keep handing to me?
MR. PETERS: Well, that's the last one for her, Your Honor.
THE COURT: Oh, okay.
MR. PETERS: Yeah.
THE WITNESS: The defendants tried sending us a settlement check for our security deposit back in

Page 47

the mail, which we then gave to our -- Mr. Kyle Peters.
MR. PETERS: Okay. So I'll admit that into evidence as Plaintiff's Exhibit J. And Your Honor, I'm just that -- that's just a copy. I have the

originals right here --
(EXHIBIT J ADMITTED INTO EVIDENCE)
THE COURT: Okay.

APPENDIX T-3-D — Tompkins on the Substitute Dwelling and the $150 Differential

July 30, 2024 Trial Transcript — page 10, lines 12 through 18; page 11, lines 3 through 5; page 12, lines 5 through 15

Plaintiff Tompkins states her address, states that she rents it, and gives the rent differential on which damages were calculated.

Page 10

Q. Okay. And what is your current address?
A. 8104 Summer Gate Court, Jacksonville, Florida, 32256.
Q. And where did -- when did you start living there?
A. I started living there in the middle of December. Around December 15th.

Page 11

Q. Okay. And do you own, rent? How are you living there?
A. I am renting.

Page 12

Q. Did you live at any place between this place you're in now and 8100 Summer Gate?
A. No, sir.
Q. Okay. And what is your rent for the current place you're living in now?
A. 1650.
Q. What's the difference between the rent in that place and the 8100 Summer Gate Court?
A. $150.
Q. Is that per month?

15 A. Yes, sir.

APPENDIX T-3-E — Tompkins on Who Occupied the Leased Property

July 30, 2024 Trial Transcript — page 13, lines 4 through 6; page 23, line 22 through page 24, line 1

Plaintiff Tompkins identifies her relationship to Plaintiff Keita and states who took occupancy of the leased property on December 1, 2023.

Page 13
4 Q. Okay. And what is your connection with the
5 other plaintiff, Nathaniel Keita?
6 A. This is my fiance.
Page 23
22 Q. Got it. So when you first moved in, you said
23 that was on December 1 after getting possession of the
24 property, who moved in there with you?
25 A. Nathaniel Keita and my daughter, Zoe Keita,
Page 24
1 who is five years old.

APPENDIX T-3-F — Tompkins' Two Sworn Move-In Dates

July 30, 2024 Trial Transcript — page 10, lines 12 through 22; page 15, lines 13 through 23

Plaintiff Tompkins gives two different dates for moving into the substitute dwelling, and Plaintiff Keita supplies the second date.

Page 10
12 Q. Okay. And what is your current address?
13 A. 8104 Summer Gate Court, Jacksonville, Florida,

14 32256.
15 Q. And where did -- when did you start living
16 there?
17 A. I started living there in the middle of
18 December. Around December 15th.
19 THE COURT: December what year?
20 THE WITNESS: 2023.
21 THE COURT: 2023?
22 THE WITNESS: Yes.

Page 15

13 THE COURT: You started renting from them when?
14 THE WITNESS: December --
15 THE COURT: '20 -- okay. December of '23. So
16 2023, right? So when did you start -- when did you
17 move to the -- your current location?
18 THE WITNESS: I'm pretty sure it was in the
19 middle of the month or either January 1st.
20 MR. KEITA: It was the top of January, sir.
21 THE WITNESS: Sorry. It was January 1st when
22 we moved in.
23 THE COURT: January? Okay. Continue.

APPENDIX T-3-G — Tompkins: One Night in the Leased Property

July 30, 2024 Trial Transcript — page 25, lines 4 through 9

Plaintiff Tompkins testifies that the household slept in the leased property one night.

Page 25

4 Q. When did you move out of the property?
5 A. The keys were back in the hands of the
6 defendants on December 15, 2023.
7 Q. Well before that, were you still living there?
8 A. No. We only slept in the building one night

9 the entire time. The entire 15 days we were there.

APPENDIX T-3-H — Counsel Supplies the $150 Differential

July 30, 2024 Trial Transcript — page 33, lines 14 through 21

Plaintiffs' counsel restates the rent figures; no witness testifies to a lease term.

Page 33

14 MR. PETERS: And so we also as -- just to
15 remind you, as we discussed earlier, there was a
16 difference in rent amount as you testified, there
17 was $150 per month difference in the rent.
18 THE COURT: Okay.
19 MR. PETERS: So she's paid 1650 for her new
20 place and she was paying 1500 under the current
21 lease or in the old lease with the Gnanams.

APPENDIX T-4: January 8, 2026 Hearing Transcript

1. Petitioner Palanikumar Gnanam was muted by Judge Shayla Lee for almost the entire Hearing. The Court declined to hear him and directed him to lower his hand.
2. **Petitioner Palanikumar Gnanam spoke zero words during the entire Hearing.**
3. Plaintiffs were a "no-show" to this Hearing.
4. Plaintiffs' Counsel, Kyle Peters, provided a sworn statement for the Plaintiffs. He did not provide an answer to the "Other Exemptions" based on Federal Bankruptcy law.

5. Petitioners' threshold motion to strike Plaintiff's counsel's answer was not heard. The order later entered on the Claim of Exemption does not address it. Reproduced at Appendix P-1

APPENDIX T-4-A – Garnishee Counsel on Rollover of the Released Assets

January 8, 2026 Hearing Transcript — page 18, lines 2 through 22

Counsel for the Garnishee addresses the rollover of the assets ordered released.

Page 18

MR. BERNSTEIN: Your Honor, there was a pending appeal in the Supreme Court, and there's a pending motion to stay the garnishment matter. I believe there's a pending motion for reconsideration. We essentially just wanted to have an oral tenant's motion for clarification, just that there's nothing preventing the bank from complying with the final judgment, that there's no stay due to any of the appeals, that the motion for reconsideration of the final judgment is denied and that the bank's authorized to comply with that.

. . . . . And then like Mr. Peters said, once that's complied with, there is both a safe deposit box and excess funds, which would then become subject to this new writ, which as Mr. Peters indicated, there's additional judgments that the funds would go to satisfy.

So we're -- you know, we have the funds. We're ready, willing, and able to comply if that's what the Court intends. We just wanted that clarification that there's

no impediment to the bank's compliance with that final judgment order.

APPENDIX T-4-B – Garnishee Counsel on the Remainder and the New Writ

January 8, 2026 Hearing Transcript — page 20, lines 1 through 17

Page 20 – Mr. Bernstein represents Garnishee

MR. BERNSTEIN: And so it's a SCOTUS appeal, which is technically pending, but he just keeps filing notices of extension of time to file his documents. And there's a motion before you, which I believe was filed on the second, which is a motion to stay enforcement of the default garnishment judgment pending that appeal. So we essentially just wanted resolution. And I believe there are a couple other ancillary related motions. But we essentially just wanted an order clarifying that there is nothing abating or staying compliance with that final judgment and garnishment order that, you know, the bank should forthwith, comply with the same, and then the remainder from that would then become subject to this new writ, which would be the subject of this Claim of Exemption hearing to determine whether the funds are collectible or not as to this new writ.

APPENDIX T-4-C — Garnishee Counsel on the Restricted Boxes and Petitioners' Access to the Accounts

January 8, 2026 Hearing Transcript — page 51, line 21 through page 52, line 17

Counsel for the Garnishee states that the safe deposit boxes are restricted under the second writ, and that as to the accounts Petitioners should have full access. Petitioner responds that access was not given. The court declines to address it.

Page 51

MR. BERNSTEIN: And, Your Honor, if I may briefly, just to draw a distinction here. Obviously, the safe deposit box they do not have access to because that's restricted pursuant to this new writ. But as to the account itself, they should have full access to that

Page 52 LegNormal3

in requesting records in the account itself at this point. That hold would have been released once the new answer was filed, so they should have access to their account itself. Obviously, the -- there's an additional $30 which was held pursuant to that writ. They obviously won't have access to that or the prior funds. But the account itself, they should have full access to, and then with the exception, obviously, of having access to the safe deposit.

MS. GNANAM: No, sir. That's not true, actually. They -- they didn't give me access.

THE COURT: That's something that you need to work out with the bank. That's not something that -- that's in the Court's purview, and I'm not going to deal

16 with that currently. That's something that you can work
17 out with the bank.

[Petitioners' note: The "new writ" is the second Writ of Garnishment, issued December 22, 2025 for $39,131.00. That sum includes the identical $24,973.51 principal judgment that D#241 had already directed Wells Fargo to disburse from Account 3751 — disbursed February 12, 2026, with no Satisfaction of Judgment ever filed. It further includes $2,990.38 in post-judgment interest accrued while those same funds sat frozen under the first writ, issued November 5, 2024. D#241 ordered accounts 0195 and 4079 and safe deposit boxes 0041 and 0051 "immediately released and made available to those account holders." No order of this Court has vacated or modified that provision. At the January 8, 2026 hearing, counsel for the Garnishee stated that:

Page 18
13 And then like Mr. Peters said, once that's
14 complied with, there is both a safe deposit box and
15 excess funds, which would then become subject to this
16 new writ, which as Mr. Peters indicated, there's

Tr. Jan. 8, 2026, p. 18, ll. 13–16. As of the Garnishee's Second Amended Answer of February 20, 2026, $27,892.11 from Account 3751 remained on hold and both boxes remained listed as subject to the writ.]

APPENDIX T-4-D — The Court Declines to Hear the Primary Petitioner

January 8, 2026 Hearing Transcript — page 22, line 17 through page 23, line 13

APPENDIX T – Transcript Excerpts

Petitioner Mullairani Gnanam asks whether her husband, the primary Petitioner, may ask a question. The court refuses.

The court knows very well that the husband is the Primary Petitioner, who drafted all motions and notices, the only one with knowledge of the Federal Bankruptcy laws, so he was blocked to prevent him from raising issues on the matter. Judge Lee also did not address the threshold motion to strike Plaintiffs' Counsel's answer and discussed many matters, with the Primary Petitioner being muted. The whole case permitted Primary Petitioner to represent himself and his wife except at critical points when he was blocked entirely from participation.

Page 22

THE WITNESS: I'm -- well, I didn't understand your ruling, Your Honor. Is there any way that my husband can ask a question? Is there any way that he can -- I'm a little bit not understanding what you just said -- told me.

THE COURT: So, Ms. Gnanam, the reason why I have not addressed your husband, and again, I'm going to -- I'm going to state this again. You filed a Claim of Exemption in your name regarding the garnishment. I

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cannot allow your husband to speak on your behalf because he is not a licensed barred attorney in the state of Florida. In the state of Florida, if I am not permitted to allow someone to practice law without a license, in order for him to speak on your behalf, he would

essentially be representing you in court as an attorney,
and I am not permitted by laws of Florida to allow him
to do that.
THE WITNESS: But --
THE COURT: If your husband had filed this Claim of Exemption in his name, I would be having a
conversation with him.

APPENDIX T-4-E — The Primary Petitioner Is Directed to Lower His Hand

January 8, 2026 Hearing Transcript — page 11, lines 14 through 21

The primary Petitioner, present by video, raises his hand and is directed to lower it. The Judge did not allow him to speak. Primary Petitioner is a co-defendant and not a surrogate advocate. The properties in question are being held in both defendants name. This physically stripped a named litigant of his constitutional right to be heard in defense of his own property. Additionally, only the primary petitioner was knowledgeable on the Federal Bankruptcy statutes which was part of the Claim of Exemption. After this hearing, the Defendants filed Motion to Disqualify and Judge Shayla Lee did not deny the motion.

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THE COURT: It's okay. Just give me a moment.
I am going to interject myself for a couple of reasons.
One, Mr. Gnanam, put your hand down, sir.
This Claim of Exemption was filed by your wife, and so
the -- I see your messages in the chat. Your wife is
filing a Claim of Exemption. She's indicating that she

is exempt. So all of the questions that we're asking are as applies to your wife.

APPENDIX T – Transcript Excerpts

APPENDIX U – Address Contradiction between State and Bankruptcy Courts

The Address Contradiction Directly Impacts Trial Judgments

Note on Reproduction

The bankruptcy filings reproduced in this appendix were filed on paper larger than 6⅛ by 9¼ inches and cannot be photo-reduced for booklet format. Petitioners have therefore set out the material entries in typeset form. Entries appear as they read on the forms. Blank fields are shown as blank, and check-box selections are shown as they appear on the filed forms. The columns provided for a second debtor are omitted throughout, this not being a joint case, and the debtor's Social Security number and Employer Identification Number are omitted. The complete filings are part of the record of the proceedings below and Petitioners will furnish them upon request.

APPENDIX U-1 — The Address Stated in the State Court

Final Judgment After Non-Jury Trial, entered August 1, 2024 — Appendix F-1

"Final Judgement is hereby entered in favor of the Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins, whose address is 8104 Summer Gate Ct, Jacksonville, FL 32256 ..."

Final Judgment Awarding Attorneys' Fees and Costs, entered August 29, 2024 — Appendix F-3

"Therefore, the Plaintiffs, Nathaniel Chibuzor Keita and Lana Paige Tompkins, whose address is 8104 Summer Gate Ct, Jacksonville, FL 32256, shall have

and recover from Defendants ... the total sum of $24,973.51 ..."

Case Summary, Case No. 16-2024-CC-000687-AXXX-MA, County Court, Fourth Judicial Circuit, Duval County, Florida — retrieved August 11, 2026

Department: County Civil. Division: CC-H. Case status: RE-OPEN. File date: January 9, 2024.

Parties

Nathaniel Chibuzor Keita — Plaintiff — 8104 Summergate Court, Jacksonville, FL 32256

Lana Paige Tompkins — Plaintiff — 8104 Summer Gate Ct, Jacksonville, FL 32256

[Petitioners' note: The judgments are reproduced in full at Appendix F-1 and Appendix F-3 and are not reprinted here. The address shown on the Clerk's case summary is the address supplied by Plaintiffs at filing on January 9, 2024.]

APPENDIX U-2 — The Address Sworn to the Bankruptcy Court

Official Form 101, Voluntary Petition for Individuals Filing for Bankruptcy — Doc 1, filed March 28, 2025, page 2 of 8

Debtor 1: Nathaniel Chibuzor Keita

5. Where you live
7638 Fawn Lake Dr S
Jacksonville, FL 32256-3682
Duval County
[Petitioners' note: The form directs that if the mailing address differs from the residence address, it be entered separately. That field is blank.]

Official Form 309A, Notice of Chapter 7 Bankruptcy Case — Doc 6, filed March 31, 2025, page 1 of 2

Notice issued by the Clerk of the United States Bankruptcy Court and mailed to creditors.

1. **Debtor's full name:** Nathaniel Chibuzor Keita

3. **Address:** 7638 Fawn Lake Dr S, Jacksonville, FL 32256-3682

[Petitioners' note: The address 7638 Fawn Lake Dr S appears nineteen times in the bankruptcy filings, including in the creditor matrix used by the Clerk to notice creditors. It is the only residence address stated anywhere in the filings.]

APPENDIX U-3 — The Sworn Statement That No Other Residence Existed

Official Form 107, Statement of Financial Affairs for Individuals Filing for Bankruptcy — Doc 15, filed April 16, 2025

Part 1: Give Details About Your Marital Status and Where You Lived Before

2. During the last 3 years, have you lived anywhere other than where you live now?

☒ **No**

☐ Yes. List all of the places you lived in the last 3 years. Do not include where you live now.

[Petitioners' note: The table provided for prior residences is blank. Read together with Question 5 of the Voluntary Petition, which states the residence as 7638 Fawn Lake Dr S, the answer to Question 2 is a sworn statement that Plaintiff Keita resided at 7638 Fawn Lake Dr S, Jacksonville, Florida continuously

from March 28, 2022 through March 28, 2025, and at no other address during that period.]

APPENDIX U-4 — The Occupancy Testimony Within the Same Three-Year Period

July 30, 2024 Trial Transcript — page 23, line 22 through page 24, line 1. Reproduced at Appendix T-3-E.

Plaintiff Tompkins testified that Plaintiff Keita took occupancy of the leased property with her on December 1, 2023. [Petitioners' note: The award of $1,800.00 in differential rent rests on Plaintiff Keita having occupied and been displaced from the leased property. That occupancy is established solely by the testimony reproduced above, which falls within the three-year period covered by the sworn answer at Appendix U-3.]

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Q. Okay. And what is your connection with the other plaintiff, Nathaniel Keita?
A. This is my fiance.

Page 23

Q. Got it. So when you first moved in, you said that was on December 1 after getting possession of the property, who moved in there with you?
A. Nathaniel Keita and my daughter, Zoe Keita,

Page 24

who is five years old.

THE PERIOD COVERED

January 9, 2024 — Complaint filed. Plaintiffs' address of record given as 8104 Summer Gate Ct.

July 30, 2024 — Trial Court Transcript.

August 1, 2024 — Final Judgment After Non-Jury Trial. Address stated as 8104 Summer Gate Ct.

August 29, 2024 — Final Judgment Awarding Attorneys' Fees and Costs. Address stated as 8104 Summer Gate Ct.

March 28, 2025 — Chapter 7 petition. Residence sworn as 7638 Fawn Lake Dr S, with no other residence during the preceding three years.

August 11, 2026 — Address of record in the state case remains 8104 Summergate Court.

The three-year period sworn to in the bankruptcy court encompasses the filing of the Complaint and the entry of both judgments.

APPENDIX U – Address Contradiction between State and Bankruptcy Courts

APPENDIX V — Certified Trial Court Docket Excerpts

Note on Reproduction

The certified docket of the County Court, Fourth Judicial Circuit, Duval County, Florida, Case No. 16-2024-CC-000687, was produced on 8½ by 11 inch paper and runs thirty-seven pages. It cannot be photo-reduced to the 6⅛ by 9¼ inch booklet format required by Rule 33.1. Petitioners have therefore set out in typeset form the entries material to the questions presented. Entries appear as they read on the docket. The complete certified docket is part of the record of the proceedings below and Petitioners will furnish it upon request.

D#61 6/27/2024 Motion to Recuse — Defendants
[Petitioners' Note: This motion is based on Rule 2.330, which is the rule basis for Motions to disqualify a trial judge in Florida and is governed by Florida Rule of General Practice and Judicial Administration 2.330. Subdivision (l) provides that a motion not ruled on within 30 days of service is deemed granted. Subdivision (j) provides that prior rulings of a disqualified judge may be reconsidered and vacated or amended by a successor judge.]
D#74 7/28/2024 Motion to Recuse and Disqualify
D#83 7/30/2024 Order Denying Defendant's Motion for Recusal and Disqualification
[Petitioners' Note: The Order of July 30, 2024 (D#83) is for the motion filed July 28, 2024 (D#74); it did not address D#61.]]
D#84 7/31/2024 Notice of Exclusion from the Trial — Defendant
D#100 8/1/2024 Order Denying Defendant's Pending Motions

D#101 8/1/2024 Final Judgment After Non-Jury Trial, Book 21148 Page 2453-2457
D#123 8/29/2024 Final Judgment Awarding Attorney Fees and Costs, Book 21181 Page 1202-1204
D#159 11/20/2024 Motion (Renewed and Amended) to Recuse or Disqualify Trial Judge
D#181 9/1/2025 Motion to Terminate/Vacate Final Judgment, Orders, Motions as Void for Violation of the Automatic Stay
D#192 9/8/2025 Motion to Set Aside Final Judgment (Supplement to Amended) and Vacate
D#211 10/22/2025 Motion to Set Aside Final Judgment (Emergency) and All Subsequent Orders as Void Due to Fraud on the Court, Violation of Automatic Stay, Permanent Injunction, Constitutional Due Process Violation, and Jurisdictional Violations
D#241 12/4/2025 Final Judgment in Garnishment, Book 21715 Page 1850-1854
— 12/5/2025 Cancelled Order to Show Cause on 12/4/2025 3:00:00 PM
— 12/5/2025 Cancel reason — FJ entered
D#261 12/19/2025 Motion for Writ of Garnishment (Post-Judgment)
D#262 12/19/2025 Writ of Garnishment Issued
D#271 12/27/2025 Claim of Exemption and Request for Hearing
D#277 1/8/2026 Answer of Garnishee to Writ of Garnishment
D#290 1/27/2026 Motion (Defendants' Verified) to Disqualify Judge Shayla Lee
D#291 2/11/2026 Amended Answer (Garnishee) to Writ of Garnishment
D#296 2/20/2026 Amended Answer (Garnishee, Second) to Writ of Garnishment
D#297 3/2/2026 Notice of Deemed Granted Motion to Disqualify Judge

D#299–D#303 3/4/2026 Five orders denying Defendants' motions
D#304 3/4/2026 Order of Recusal
D#306 3/9/2026 Order of Reassignment
D#314 4/1/2026 Motion for Final Judgment Against Garnishee
D#318 4/13/2026 Order Requiring Plaintiff to File Additional Information
D#341 7/6/2026 Order of Recusal
D#342 7/7/2026 Notice (Defendants') of Plaintiffs' Non-Compliance with Court Order and Demand for Mandatory Dissolution of Writ of Garnishment under Fla. Stat. § 77.041(3)
D#343 7/10/2026 Response (Defendants) in Opposition to Plaintiffs' Motion Pursuant to Rule 1.351(d) to Overrule Objections, Deny Motion for Protective Order, and Permit Production
D#344 7/21/2026 Motion (Defendants') to Vacate the December 4, 2025 Written Judgments (D#240 and D#241) as the Product of Three Fundamentally Erroneous and Prejudged Rulings Announced on October 17, 2025, and to Set Defendants' Emergency Amended Motion to Vacate (D#211) for Hearing
D#345 7/29/2026 Motion to Vacate Orders D#310 and D#311 Entered by Recused Judge Brady and for Mandatory Reconsideration under Fla. R. Gen. Prac. & Jud. Admin. 2.330(j) and Fla. Stat. § 38.07
D#346 7/29/2026 Order Reassigning to Division H — 7/30/2026 Transfer to Div. CC-H (Civil)

No entry styled "Suggestion of Bankruptcy" or "Notice of Automatic Stay" appears on the docket at any point between March 28, 2025 and August 7, 2025, or thereafter.

APPENDIX W – Notice of Exclusion from the Trial

Palanikumar Gnanam
10597 Creston Glen Cir East
Jacksonville, FL 32256

July 31, 2014 [sic: 2024]

Honorable Judge James A Ruth
IN THE COUNTY COURT OF THE
FOURTH JUDICIAL CIRCUIT IN AND FOR
DUVAL COUNTY, FLORIDA

Re: CASE NO.: 16-2024-CC-000687

NOTICE OF EXCLUSION FROM THE TRIAL

Dear Judge James A Ruth:

I am writing to formally bring to the Court's attention a grave issue regarding my exclusion from the trial held on July 30th, 2024. Despite having informed the Court multiple times of my unavoidable presence in India due to my extremely sick mother, **I was not permitted to participate in the trial, even via remote means such as a Zoom call in the post-COVID era.**

Over the last several months I have been in India to provide care for my mother, whose health condition necessitated my continuous presence. This information was communicated to the Court through several of the motions that were filed, including a Motion for Insufficient Service of Process. One of the Defendants, Defendant Mullairani Gnanam, verbally informed the Court before the trial about my

situation, stating that I was taking care of my mother who is still gravely ill on her deathbed.

My absence from the trial was not due to neglect or disregard for the judicial process but was an unavoidable consequence of my familial responsibilities. This must be self-evident from the many motions that I have filed. Despite my circumstances and the reasonable request for remote participation, I was denied the opportunity to be involved in my defense. **I am deeply distraught by this exclusion as I was the only person who had all the critical information regarding the case**. My wife a co-defendant was primarily included because she is a co-owner of the property. My inability to present this information has severely impacted my ability to ensure a fair trial.

I respectfully request the Court to consider the following:

1. **Acknowledgment of Circumstances:** Recognize the multiple communications made to the Court regarding my situation and the legitimate reasons for my absence.
2. **Review of Trial Proceedings:** Conduct a review of the trial proceedings to determine the impact of my exclusion on the fairness and just outcome of the trial. I believe it does.
3. **Opportunity for Reconsideration:** Grant me the opportunity for reconsideration of the trial's outcome or any adverse decisions made in my absence, allowing me to present my case through remote means.

4. **Future Accommodations:** Ensure that any future proceedings consider my current circumstances, including permitting remote participation.

I deeply regret any inconvenience this situation has caused but assure the Court that my commitment to resolving this matter remains steadfast. I have already sent an email of pictures of my mother in a healthy state and current state to the Judge's admin, I am prepared to provide any additional documentation or evidence required to substantiate my claims regarding my mother's health condition and my presence in India.

Thank you for your understanding and consideration in this matter.

Respectfully,
/s/ *Palanikumar V Gnanam*

Palanikumar V Gnanam, Defendant
10597 Creston Glen Cir East
Jacksonville, FL 32256
904-472-1198 (phone)
Email: pk_gnanam@yahoo.com

cc: Kyle Peters

APPENDIX X – Summary of Omitted Records

SUMMARY OF MATERIAL TRIAL COURT FILINGS AND EVIDENTIARY RECORDS OMITTED FROM PRINTED BOOKLET

Pursuant to U.S. Supreme Court Rule 14.1(i), the following pleadings, motions, federal bankruptcy records, and transcript excerpts remain part of the trial court record but have been omitted from the printed booklet-format appendix to comply with Rule 33.1's volume and page-limit constraints. Each document listed below is part of the record of this proceeding, whether it is cited in the petition or not. Petitioners will furnish any of the following to the Court or to any party upon request. Entries substantively involving Federal Bankruptcy (11 U.S.C. §§ 362, 524, 541) or Fraud on the Court are flagged with a bolded tag.

PART I: FOUNDATIONAL MOTIONS AND FEDERAL RECORDS

1. Emergency Amended Motion to Vacate Final Judgments — Trial Court Doc. No. D#211 (filed October 22, 2025 | 38 pages) [Federal Bankruptcy — Fraud on the Court]

This threshold motion asserts seven independent grounds for vacating the August 2024 judgments under Florida Rule of Civil Procedure 1.540(b): fraud on the court (the security deposit Plaintiffs sued over was already in their possession before filing suit), violation of the automatic federal stay, violation of the permanent discharge injunction, lack of personal jurisdiction (defective service), lack of subject-matter jurisdiction (premature filing under Fla. Stat. § 83.49(3)(a)), fraudulent inducement, and structural due process violations from Petitioners' exclusion at

trial. No hearing was ever scheduled and no ruling was ever entered before the predecessor judge's jurisdiction terminated.

2. Plaintiff Nathaniel Chibuzor Keita's Chapter 7 Bankruptcy Filing — U.S. Bankruptcy Court, M.D. Fla., Case No. 3:25-bk-00977 (petition filed March 28, 2025; discharged July 2, 2025; closed August 7, 2025 | 133 pages) [Federal Bankruptcy]

Keita's sworn Statement of Financial Affairs described this litigation as merely "pending" without disclosing the active appeal, and Schedule A/B omitted the August 2024 judgments as a receivable asset. Keita obtained a discharge of over $170,000 in debts on that record while his counsel simultaneously pursued collection of the undisclosed judgment. [The Notice of Automatic Stay and the Order of Discharge are retained in this appendix.]

3. Emergency Motion to Vacate December 4 and December 8 Judgments — Trial Court Doc. No. D#268 (filed December 29, 2025 | 9 pages) [Federal Bankruptcy]

Consolidated motion to set aside Judge Lee's December 4, 2025 garnishment and fee orders (D#240–D#243) and the recorded December 8, 2025 judgments (D#247, D#249) as entered without jurisdiction under the federal discharge injunction and automatic stay. Never ruled upon.

4. Motion to Vacate Judgment as Void for Violation of the Automatic Stay — Trial Court Doc. No. D#181 (filed September 1, 2025 | 10 pages) [Federal Bankruptcy]

Argues the Fifth DCA's May 1, 2025 order and related state-court actions taken between March 28

and August 7, 2025 were entered during the automatic stay under 11 U.S.C. § 362, and that the later appellate affirmance and fee awards are void because they rest on a record built during the stay.

5. Supplement to Amended Motion to Set Aside and Vacate — Trial Court Doc. No. D#192 (filed September 8, 2025 | 151 pages) [Federal Bankruptcy]

Incorporates the prior motion to set aside the August 1, 2024 judgments and adds the bankruptcy filings as evidence of the income discrepancy between trial testimony and the federal schedules. No written order disposing of this filing has been entered.

6. Emergency Motion to Compel Clerk to Search and Produce Notice of Automatic Stay — Trial Court Doc. No. D#251 (filed December 10, 2025 | 5 pages) [Federal Bankruptcy]

Seeks an order compelling the Clerk to search case records for any bankruptcy-stay notice received after March 28, 2025. Unadjudicated.

7. Emergency Motion to Compel Production of Documents from Plaintiffs — Trial Court Doc. No. D#254 (filed December 11, 2025 | 9 pages) [Federal Bankruptcy — Fraud on the Court]

Seeks Keita's tax returns, W-2s, and HENDIC LLC income statements to test the discrepancy between his trial testimony ($99,000–$100,000 annual income) and his bankruptcy schedules (~$24,000–$26,000) for the same period.

8. Hearing Transcript Excerpts (October 17, 2025; December 4, 2025; July 30, 2024 trial)

Certified transcript pages documenting the trial court's oral rulings on federal supremacy, the automatic stay, and the discharge injunction, and trial

testimony on the security deposit and income issues. [Specific lines cited in the petition are retained in this appendix.]

PART II: INTERIM PROCEDURAL RECORD

9. Amended/Renewed Motion to Recuse or Disqualify Trial Judge — D#159 (11/20/2024 | 53 pp.) Renewed recusal motion against Judge Ruth, incorporating additional grounds and evidence beyond the original July 2024 motion.

10. Motion to Correct or Expunge Improper Garnishment — D#164 (12/30/2024 | 11 pp.) Argues the garnishment was procedurally defective; asks the court to correct or strike it.

11. Motion to Stay Enforcement of Default Final Judgment of Garnishment Pending Appeal — D#165 (1/2/2025 | 10 pp.) Sought a stay of the default garnishment judgment while the Fifth DCA appeal was pending.

12. Motion for Release of Excess Garnished Funds, Interest, and Sanctions — D#170 (2/17/2025 | 19 pp.) Argues garnished funds exceeded the judgment amount; seeks return of the excess and sanctions against Plaintiffs.

13. Verified Motion to Disqualify Judge Shayla Lee — D#172 (5/6/2025 | 8 pp.) First verified disqualification motion against Judge Lee; grounds later expanded in D#290.

14. Motion to Stay Entry of All Proposed Orders Pending Ruling on Emergency Amended Motion to Vacate — D#214 (10/24/2025 | 5 pp.) Asked the court to withhold ruling on Plaintiffs' three proposed orders until the pending vacate motion (D#211) was decided.

15. Motion for Judicial Notice 1 — D#215 (10/27/2025 | 8 pp.) Notes Plaintiffs' failure to produce income documentation despite sworn income testimony.

16. Motion for Judicial Notice 2 — D#216 (10/27/2025 | 5 pp.) [Fraud on the Court] Argues Plaintiffs' filings failed to address the fraud-on-the-court allegations already in the record.

17. Motion for Judicial Notice 3 — D#221 (11/3/2025 | 7 pp.) [Federal Bankruptcy] Argues Plaintiffs' counsel had a duty to disclose the automatic stay and did not.

18. Motion for Sanctions Against Plaintiffs' Counsel — D#222 (11/6/2025 | 17 pp.) [Fraud on the Court] The original sanctions motion, later supplemented by D#238, D#313, and D#333 (Part III, item 38 below).

19. Motion to Terminate/Vacate Final Judgment — D#237 (11/21/2025 | 9 pp.) Sought termination/vacatur of the final judgment directly, apart from the broader D#211 vacate motion.

20. Supplement to Motion for Sanctions Against Plaintiffs' Counsel — D#238 (12/2/2025 | 14 pp.) [Fraud on the Court] First supplement to D#222, adding further misconduct allegations.

21. Emergency Motion to Quash Notice of Hearing and for Court-Approved Recording — D#239 (12/4/2025 | 5 pp.)

22. Motion to Stay Garnishment Pending SCOTUS Proceedings (No. 25A442) — D#250 (12/9/2025 | 4 pp.)

23. Emergency Motion to Dissolve Writ of Garnishment — D#266 (12/25/2025 | 5 pages) [Federal Bankruptcy] Argues lack of standing under 11

U.S.C. § 541 (the underlying judgment became property of the bankruptcy estate upon Keita's Chapter 7 filing and was never abandoned) and statutory inaccuracy in the writ; seeks dissolution.

24. Motion to Strike Plaintiffs' Affidavit and/or Answer to Claim of Exemption — D#276 (1/8/2026 | 16 pp.)

25. Emergency Motion to Stay Entry of Order and All Proceedings — D#281 (1/9/2026 | 7 pp.) Sought to halt all proceedings pending resolution of threshold disqualification motions.

26. Motion to Dissolve Writ of Garnishment — D#289 (1/27/2026 | 6 pp.)

27. Verified Motion to Disqualify Judge Shayla Lee (second) — D#290 (1/27/2026 | 28 pp.) Expanded disqualification motion, later deemed granted by operation of law (D#297).

28. Motion to Stay Enforcement/Execution of All Orders Entered by Disqualified Judge — D#305 (3/9/2026 | 14 pp.) Sought to stay enforcement of orders Judge Lee entered after her disqualification took effect.

29. Supplement to Emergency Motion to Dissolve Writ of Garnishment — D#308 (3/10/2026 | 8 pp.) [Federal Bankruptcy] New grounds from the second amended garnishee answer and the void March 4, 2026 orders.

30. Omnibus Motion to Successor Judge — D#309 (3/24/2026 | 23 pp.) [Federal Bankruptcy] Consolidated the outstanding threshold issues for the successor judge after reassignment. Addresses the Claim of Exemption and federal exemption grounds (§§ 362, 524) in Section VI; does not cite § 541.

31. Motion for Rehearing and Reconsideration of March 24, 2026 Orders — D#312 (3/25/2026 | 7 pp.) Sought rehearing and vacatur of the post-disqualification March 4, 2026 orders.

32. Second Supplement to Motion for Sanctions Against Plaintiffs' Counsel — D#313 (filed March 30, 2026 | 9 pages) [Federal Bankruptcy — Fraud on the Court] Adds the inducement-letter, hearsay-affidavit, and misrepresentation-of-bankruptcy-knowledge allegations to the sanctions record first opened at D#222.

33. First Supplemental Reply — Plaintiffs' Binding Concessions — Trial Court Doc. No. D#321 (filed May 15, 2026 | 28 pages) [Fraud on the Court]

First of three supplements to Defendants' Omnibus Reply to Plaintiffs' Court-Ordered Response (D#320). Documents twelve affirmative acts never denied under oath in Plaintiffs' 67-page Response, including the ex parte inducement letter, the sworn knowledge contradiction between D#235 and D#275, the income fabrication, and the security deposit perjury. Does not cite 11 U.S.C. § 541.

34. Second Supplemental Reply — Controlling Authority on Mandatory Reconsideration Standard — Trial Court Doc. No. D#322 (filed May 17, 2026 | 15 pages)

Second supplement to D#320. Argues Fla. Stat. § 38.07 and Buckner v. Cowling, 135 So. 3d 383 (Fla. 5th DCA 2014) — binding Fifth DCA authority — require mandatory reconsideration of all orders entered by disqualified judges, as a matter of right, superseding the discretionary Fourth DCA authority (Rath, Ognenovic) Plaintiffs' counsel relies on. Does not cite 11 U.S.C. § 541.

[D#323 — Third Supplemental Reply on Judicial Disqualification (filed May 21, 2026 | 15 pages) is reproduced at Appendix S, Part III, page 140a. It cites 11 U.S.C. § 541(a)(1), *Parker v. Wendy's Int'l*, 365 F.3d 1268 (11th Cir. 2004), and *Barger v. City of Cartersville*, 348 F.3d 1289 (11th Cir. 2003).]

35. Omnibus Reply to Plaintiffs' Court-Ordered Response — Trial Court Doc. No. D#325 (filed June 1, 2026 | 92 pages) [Federal Bankruptcy — Fraud on the Court]

The base reply to which D#321, D#322, and D#323 are supplements, incorporating all three by reference and addressing the remaining unrebutted arguments in Plaintiffs' May 1, 2026 Response (D#320) across fifteen sections, including fraud on the court, the premature-filing jurisdictional defect, the hearsay Claim of Exemption affidavit, the ministerial-act defense, and sanctions. Contains the most developed treatment of the 11 U.S.C. § 541 standing argument in the case record (paragraphs 116-122), including Wilson v. Dollar General Corp., 717 F.3d 337 (4th Cir. 2013), Parker, Barger, and the § 726 distribution-waterfall point. **Omitted from full-text inclusion on volume grounds (92 pages) — this is the single largest document in the case record.**

36. Notice of Filing — Improper Correspondence by Plaintiffs' Counsel Dated May 1, 2026 — Trial Court Doc. No. D#330 (filed June 10, 2026 | pages not yet confirmed) [Fraud on the Court]

Documents Kyle Peters' May 1, 2026 letter to Judge Brady and email to the Judicial Assistant transmitting Plaintiffs' Court-Ordered Response (D#320) and offering to personally deliver hard copies directly to chambers, outside the Florida Courts E-Filing Portal

— the same ex parte pattern first raised in D#222, Ground IV.A.

37. Notice of Filing — Improper Correspondence by Plaintiffs' Counsel Dated June 4, 2026 — Trial Court Doc. No. D#331 (filed June 10, 2026 | pages not yet confirmed) [Fraud on the Court]

Documents Kyle Peters' June 4, 2026 letter to Judge Brady, transmitting Plaintiffs' Notice of Compliance (D#326) and Motion to Inventory Safe Deposit Boxes (D#328) directly to chambers outside the E-Filing Portal.

PART III: THE RECENT TRIAL COURT RECORD (D#333 THROUGH REASSIGNMENT)

38. Statement (Defendant's Third) / Supplement to Motion for Sanctions Against Plaintiffs' Counsel (D#222) — Trial Court Doc. No. D#333 (filed June 12, 2026 | 16 pages) [Fraud on the Court]

Documents Plaintiffs' counsel's pattern of bypassing the Florida Courts E-Filing Portal for direct, private correspondence with Successor Judge Brady's chambers — the same informal channel that produced the March 4, 2026 orders under Judge Lee after her disqualification.

39. Motion for Protective Order and Objection to Notice of Intent to Serve Subpoena (D#329) and First Request for Production to Garnishee (D#327) — Trial Court Doc. No. D#334 (filed June 12, 2026 | 12 pages)

Objects to Plaintiffs' effort to subpoena and open Petitioners' safe deposit boxes ending in 0041 and 0051, on the ground that Clause E of the December 4, 2025

final garnishment judgment (D#241) had already ordered those boxes released.

40. Response in Opposition to Plaintiffs' Motion to Inventory Safe Deposit Boxes (D#328) — Trial Court Doc. No. D#335 (filed June 15, 2026 | 13 pages) [Fraud on the Court]

Documents that the garnishee, Wells Fargo Bank, N.A., filed three successive answers — January 8, February 11, and February 20, 2026 — each treating accounts released under Clause E as still subject to the writ, without any court order authorizing that treatment. At the January 8, 2026 hearing, Wells Fargo's counsel, Mr. Bernstein, stated on the record that "once that's complied with, there is both a safe deposit box and excess funds, which would then become subject to this new writ," prefacing the statement with "like Mr. Peters said" — identifying Plaintiffs' counsel as the source of the arrangement. (Tr. Jan. 8, 2026, p. 18, ll. 13–16; p. 20, ll. 1–17.) No motion, hearing, or order authorized routing the Clause E-released funds and boxes into the second writ. Wells Fargo disbursed $25,239.49 to Plaintiffs' counsel on February 12, 2026 without a Satisfaction of Judgment ever being filed as Clause D required, and continued to hold $8,055.22 and the two safe deposit boxes.

41. Notice to Successor Judge of Recent Filings, Status of Pending Threshold Motions, and Pending United States Supreme Court Proceeding — Trial Court Doc. No. D#336 (filed June 18, 2026 | 24 pages) [Federal Bankruptcy — Fraud on the Court]

A chronological roadmap for the successor judge cataloging the unadjudicated record: bankruptcy stay violations, the January 8, 2026 rollover arrangement

(item 40 above), and the pending certiorari proceeding, none addressed on the merits while enforcement actions continued to advance.

42. Plaintiffs' Motion Pursuant to Rule 1.351(c) to Overrule Objections and Deny Motion for Protective Order — Trial Court Doc. No. D#337 (filed June 23, 2026 | 4 pages)

Plaintiffs' counsel's motion to compel Wells Fargo's production over Petitioners' bankruptcy/stay/fraud objections.

43. Notice of Intent to Respond to Plaintiff's Motion (D#337) and Notice of Threshold Deficiencies — Trial Court Doc. No. D#338 (filed June 23, 2026 | 8 pages) [Federal Bankruptcy — Fraud on the Court]

Sets out seven independent bases requiring denial of D#337, including that the subpoena bypasses the court-ordered release of the boxes under Clause E.

44. Verified Emergency Motion to Stay Production and for Emergency Hearing — Trial Court Doc. No. D#339 (filed June 29, 2026 | 12 pages)

Sought to block drilling/inventorying the safe deposit boxes ahead of the July 2, 2026 deadline pending resolution of the threshold jurisdictional motions.

45. Notice of Fraud on the Court Through Overlaid Judgments and Writs of Garnishment — Trial Court Doc. No. D#340 (filed June 30, 2026 | 15 pages) [Federal Bankruptcy — Fraud on the Court]

Alleges a pattern of enforcing pre-bankruptcy (2024) judgments and writs alongside post-discharge instruments, and asserts a threefold federal bar: under 11 U.S.C. § 541(a)(1) the August 2024 judgment became property of the bankruptcy estate on March 28,

2025 and Keita lost standing to enforce it; under § 362 the stay barred the state and appellate proceedings conducted between March 28 and August 7, 2025; and under § 524 the July 2, 2025 discharge injunction barred the post-discharge collection acts.

6. Order of Recusal [Judge Brady] — Trial Court Doc. No. D#341 (filed July 6, 2026 | 2 pages)

Judge Kristen Brooke Brady's recusal order, without stated grounds, directing reassignment.

47. Notice of Plaintiffs' Non-Compliance with Court-Order and Demand for Mandatory Dissolution — Trial Court Doc. No. D#342 (filed July 8, 2026 | 6 pages)

Argues Plaintiffs' response to Judge Brady's April 13, 2026 disclosure order (D#318) lacked a party-sworn denial, and that the resulting silence operates as an admission triggering mandatory dissolution of the writ under Fla. Stat. § 77.041(3).

48. Response in Opposition to Plaintiffs' Rule 1.351(d) Motion to Overrule Objections — Trial Court Doc. No. D#343 (filed July 14, 2026 | 16 pages) [Federal Bankruptcy]

Argues the court lacks subject-matter jurisdiction to authorize further enforcement discovery because the underlying judgments are void and the debt discharged.

49. Motion to Vacate the December 4, 2025 Written Judgments (D#240 and D#241) — Trial Court Doc. No. D#344 (filed July 22, 2026 | 29 pages)

Argues the December 4, 2025 judgments are the product of oral rulings prejudged at the October 17,

2025 hearing, and requests a merits hearing on the still-unheard D#211.

50. Motion to Vacate Orders D#310 and D#311 Entered by Recused Judge Brady and for Mandatory Reconsideration — Trial Court Doc. No. D#345 (filed/entered July 29, 2026 | 25 pages)

—

Argues the successor judge has a mandatory duty under Rule 2.330(j) of the Fla. R. Gen. Prac. & Jud. Admin. and Fla. Stat. § 38.07 to reconsider and vacate the March 24, 2026 denials entered by a judge who had already recused.

51. Order Reassigning Case to Division H — Trial Court Doc. No. D#346 (filed July 29, 2026; entered July 30, 2026 | 2 pages)

Administrative order transferring the case to Duval County Court Division CC-H, the Honorable Kelly Eckley-Moulder presiding.

52. Motion for Relief from the Final Judgment and Differential Rent Award on the Ground of Fraud on the Court by Plaintiff Lana Paige Tompkins — Trial Court Doc. No. D#348 (filed September 1, 2026; entered September 2, 2026 | 16 pages)

Argues that the $1,800.00 differential rent award rests on no lease for 8104 Summer Gate Court, a twelve-month term supplied by counsel rather than by any witness, two irreconcilable sworn move-in dates, and an occupancy Plaintiff Keita later denied under oath in his federal bankruptcy filings; seeks vacatur under Fla. R. Civ. P. 1.540(b) and Cox v. Burke, 706 So. 2d 43 (Fla. 5th DCA 1998).

53. Declaration of Appellees' Attorneys' Fees (Kyle Peters) — Trial Court Doc. No. D#188

(filed September 3, 2025 | 12 pages)
Peters swears that "[m]y firm and Plaintiffs agreed to an hourly fee of $275.00 per hour" and that $10,862.50 was "incurred by and to be charged to and collected from Plaintiffs"; his time entries show 38.3 of 39.5 hours were for work performed before Respondent Keita's March 28, 2025 bankruptcy petition.

54. Notice of Filing "Notice of Returned Certified Mail to Nathaniel Chibuzor Keita and Preservation of Implications" — Trial Court Doc. No. D#175 (filed June 4, 2025 | 23 pages)
Files in the trial court record the notice, first filed in the Florida Supreme Court, that certified mail sent to Plaintiff Keita at 8104 Summer Gate Court—the address the trial court record lists for both Plaintiffs—was returned by USPS endorsed "Addressee not known at place of address."

55. Wells Fargo Hold on Safe Deposit Box A0041 — Wells Fargo online banking screen (not yet filed in the trial court)
Wells Fargo's own screen shows the box is blocked by a legal hold added on December 23, 2025. The December 4, 2025 Final Judgment (D#241) had ordered the box released. No court order between December 4 and December 23, 2025 approved this hold; the only new paper was the second writ (D#262), issued by the clerk at Plaintiffs' request, which does not mention D#241 or its release order. The screen lists Plaintiffs' counsel, KP Law PLLC, as the contact. The screen reads (account number shortened):
"Account number: xxxxxxxxxxx0041 | Box: A0041 | Last accessed: 06/08/2026 | Access blocked | RESTRAINT: LEGAL ORDER HOLD | Added:

12/23/2025 | Florida #2024CC000687
$39,131.00:KP LAW PLLC | Contact (904) 515-
5735:Legal Order# 102276925"

APPENDIX X – Summary of Omitted Records

APPENDIX Y — Plaintiffs' Counsel's Sworn Answer to Claim of Exemption

Trial Court Doc. No. D#275 (filed January 2, 2026 | 2 pages)

Filing # 238698220 E-Filed 01/02/2026 04:01:28 PM

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

NATHANIEL CHIBUZOR KEITA and LANA PAIGE TOMPKINS, Plaintiffs,

CASE NO.: 2024-CC-000687

vs.

PALANIKUMAR V. GNANAM and MULLAIRANI GNANAM, Defendants.

_____/

PLAINTIFFS' SWORN ANSWER PURSUANT TO FLA. STAT. § 77.041(3) TO DEFENDANT, MULLAIRANI GNANAM'S CLAIM OF EXEMPTION

I, Kyle Peters, Esq. who, being of lawful age hereby declare as follows:

1. I am the counsel for plaintiffs in this action. I am over 18 years of age and competent to make this declaration. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto.

2. I received on December 27, 2025, a claim of exemption form alleging that defendant, Mullairani Gnanam is head of household, claiming head of family wages, she has net earnings of $750 or less per

week, and she provides more than one half of the support for a child or other dependent.

3. The claim of exemption fails to address specific factors that would enable the Court or Plaintiffs to determine whether Defendant is actually head of household, namely the name of the alleged dependent and whether any other individuals reside at the household that contribute to the dependent's support.

4. Even assuming *arguendo* that any portion of the funds at issue once derived from earnings, they cannot qualify for exemption under Fla. Stat. § 222.11(3) because the statute protects deposited earnings only if (1) they were paid within the preceding six months and (2) are identifiable and traceable as earnings.

5. The Garnishee, Wells Fargo Bank, N.A., filed its Answer on November 26, 2024, confirming that it had "set aside" the Defendants' funds pursuant to a prior writ of garnishment in 2024. Those funds have therefore been continuously frozen since at least November 26, 2024. Accordingly, unless Wells Fargo reports that it has set aside additional, later-deposited funds after service of the current writ, it is not possible that any portion of the garnished balance consists of earnings paid or deposited within the last six months as required by Fla. Stat. § 222.11(3).

6. Also, the defendants previously claimed, on at least one occasion, that the defendant, Mullairani "is only a housewife with no legal or business experience." Amended Motion to Set Aside Final Judgment, at pg 18, ¶ 7(b) (Doc#116/D118). If defendant, Mullairani was not employed and earned no wages, as the term 'housewife' implies, then the funds in the account cannot be "earnings" within the meaning of

Fla. Stat. § 222.11 and cannot qualify for the head-of-family exemption without clear, competent evidence to the contrary.

7. The defendant, Mullairani also claimed she was entitled to another exemption as provide by law. She claimed:

> "This writ is void ab initio under the Federal Bankruptcy Stay (11 U.S.C. § 362) and Discharge Injunction (11 U.S.C. § 524) regarding Respondent Nathaniel Keita (Case No. 3:25-bk-00977-BAJ), The underlying judgment is being challenged in the U.S. Supreme Court (Case No: 25A442) as 'poisoned fruit, concealment, and a violation of the Supremacy Clause."

8. The defendant again attempts to defeat garnishment by invoking previously debunked bankruptcy arguments. These arguments are irrelevant and have already been raised, argued, and expressly rejected by this Court on the record at the October 17, 2025 hearing. The Court has already determined that no bankruptcy stay or injunction bars enforcement of the final judgment in this action and that such arguments provide no legal basis to suspend garnishment.

9. The judgment at issue remains final, valid, and enforceable. The Defendants' continued repetition of the same rejected theories is frivolous, harassing, and not made in good faith.

Under penalties of perjury, I declare that I have read the foregoing Declaration and that the facts stated in it are true to the best of my knowledge and belief.

Executed on January 2, 2026 in Duval, Florida.

Signature: _____

APPENDIX Y — Plaintiffs' Counsel's Sworn Answer to Claim of Exemption

Print Name: Kyle Peters, Esq.
Florida Bar No.: 91941
221 N. Hogan Street, # 375
Jacksonville, Florida 32202
Direct: 904.476.4790
Counsel for Plaintiffs
kpeters@kpeterslaw.com

APPENDIX Y — Plaintiffs' Counsel's Sworn Answer to Claim of Exemption

APPENDIX Z – Additional Transcripts

APPENDIX Z-1: October 17, 2025 Hearing

APPENDIX Z-1-A – Judge Lee on Income and Address Changes

October 17, 2025 Hearing Transcript — page 21, line 23 through page 22, line 23

Petitioner states that Respondent swore to an income of $22,000–$26,000 in the bankruptcy court, contrary to his trial testimony and rental application, and told Petitioners he paid $2,000–$2,200 in rent as a tenant while telling the bankruptcy court he paid nothing at the same address; the trial court responds that his income or address may have changed.

Page 21

MR. GNANAM: Okay. I'll proceed. Now, in the sworn statements given to the bankruptcy scope, his income is 22 and $26,000. That is direct violation

Page 22 — [MR. GNANAM continuing]

of what he said in the trial -- in the trial court and what he provided in the application and I have provided those applications to the court in several filings and actually one of those statements -- applications has been provided by opposing Counsel Peters.

So yes, when he provides two different courts, two different pieces of information about multiple aspects, not just income, the residency before what he paid as rent, he told me he paid 2000 -- $2,200. In the -- in the -- in the -- in the bankruptcy court, he's staying at the same place and he's saying he's paying zero dollars per month as rent for example --

THE COURT: Mr. Gnanam, the question is how do

16 you know that those things are false because you're
17 telling me that he said something in November of
18 2024 and something else in March and April of 2025.
19 How do I know that his income didn't change or his
20 address didn't change as often --
21 MR. GNANAM: Because --
22 THE COURT: -- it happened with multiple people
23 throughout.

APPENDIX Z-1-B – Petitioner on the Residence Contradiction

October 17, 2025 Hearing Transcript — page 58, lines 7 through 12

Petitioner states that Respondent swore to the bankruptcy court that he lived only at 7638 Fawn Lake Drive South for three years, while claiming differential rent for living at 8104 Summer Gate Court.

Page 58 — [MR. GNANAM continuing]
7 They gained differential rent $1,800 claiming
8 that they lived together in 18104 [should be '8104'] in 2024 in the
9 bankruptcy court, Nathaniel Chibuzor Keita has said,
10 for the past three years, he has lived only in 7638
11 Fawn Lake Drive South, and no place else. My mail
12 to him did not reach him.

APPENDIX Z-1-C – Judge Lee Finds the Listed Contradictions Exist

October 17, 2025 Hearing Transcript — page 66, lines 13 through 24

After Petitioner set out the income, rent, and residence contradictions between Respondent's trial testimony and his sworn bankruptcy schedules (Appendices Z-1-A; Z-1-B), the trial court acknowledges that

the contradictions show Respondent "said two separate things," yet declines to act on them.

Page 66 — [THE COURT continuing]

13 This again, is in my opinion, mostly
14 duplicative of the arguments that were made and the
15 prior motions that were filed. I will give you five
16 minutes or less to be heard on this particular
17 motion, but as I've stated before, I don't see where
18 you can prove to me prove that anything had to be
19 stated in your proceeding based on the bankruptcy
20 and the contradictions that you listed show that he
21 said two separate things, but you've not shown me
22 any proof that you can prove that one of those two
23 things was a lie, only that they contradict each
24 other.

APPENDIX Z-1-D – Judge Lee Demands W-2 Forms

October 17, 2025 Hearing Transcript — page 51, lines 8 through 14

The trial court demands W-2 forms or other proof of Respondent's income before it will act on the contradiction. Petitioners had requested those records before trial and moved to compel Respondent's tax returns, W-2s, and income statements; that motion has never been ruled on (Appendices K; V; X.7).

Page 51 — [THE COURT continuing]

8 We are far beyond rental application and its, I
9 guess, indications in this particular case. I don't
10 understand why it is Mr. Gnanam, that I keep
having
11 to say that to you unless you can tell me that you
12 have in your possession W-2 forms or some sort of
13 proof of what Mr. Keita's income was one way or the
14 other.

APPENDIX Z-1-E – Judge Lee Rejects Borg-Warner and Relies on State Law

October 17, 2025 Hearing Transcript — page 64, line 15 through page 65, line 1

Petitioner cites Borg-Warner Acceptance Corp. v. Hall, 685 F.2d 1306 (11th Cir. 1982), the controlling Eleventh Circuit decision holding that acts taken in violation of the automatic stay are void. The trial court rejects it and states that it is basing its ruling "on the law of the state, not any particular case law."

Page 64

MR. GNANAM: Your Honor, Board Warner [should be 'Borg-Warner']
Acceptance v. Hall, Board v. Hall [should be 'Borg-Warner v. Hall'] -- board [should be 'Borg-Warner'] that
particular case law, and I can provide you a
citation will provide, and I'll provide the other
citation case laws on this matter that shows that I
am correct on this matter. So --
THE COURT: No, it doesn't because first of
all, your case is not the same as the case.
MR. GNANAM: What's your case law, Your Honor?
What is your case law, your base this on?
THE COURT: I'm basing it on the law of the

Page 65 — [THE COURT continuing]

state, not any particular case law.

APPENDIX Z-2: December 4, 2025 Hearing

APPENDIX Z-2-A – Judge Lee Disclaims Jurisdiction over Bankruptcy

December 4, 2025 Hearing Transcript — page 21, lines 6 through 16

Petitioner had filed Respondent's own sworn bankruptcy schedules in the county court to show the contradictions and the concealed judgment. The trial court states that it is not concerned with anything filed in the bankruptcy court because it has "no jurisdiction over bankruptcies or bankruptcy court."

Page 21

THE COURT: As I stated before in the previous hearing, I don't find that the plaintiffs were under any obligation to file this document. And so now you saying that you filed it because they didn't and admitting to the fact that you filed their confidential information in this court case. I'm not concerned with anything that is filed in a bankruptcy court because I have no jurisdiction over bankruptcies or bankruptcy court. So I'm only concerned with what is filed in Case 16-2024-CC-687 (sic) in Duval County Court, Division F, where I sit and preside.

APPENDIX Z-3: January 8, 2026 Hearing

APPENDIX Z-3-A – Plaintiffs' Counsel on Re-Garnishing the Same Frozen Funds

January 8, 2026 Hearing Transcript — page 16, line 17 through page 17, line 22

The first writ, issued November 5, 2024, froze Petitioners' Wells Fargo accounts. The December 4, 2025 Final Judgment of Garnishment (D#241) directed disbursement of $25,239.49 to Respondents' counsel and, under Adjudication Clause E, ordered the remaining accounts and safe deposit boxes released (Appendix G-1). On December 22, 2025, Respondents obtained a second writ for $39,131.00, which again includes the same $24,973.51 principal judgment. At this hearing, Respondents' counsel states that the judgment "has not been paid," that the accounts were "re-garnished," that the second writ applies "to the same funds that have been frozen and set aside since November of 2024," and that Respondents seek to "capture all the money that's been set aside by Wells Fargo, not just part of it."

Page 16 — [THE COURT continuing]

Mr. Peters, let me just turn back to the plaintiff to make sure that there is no confusion on the Court's part. The garnishment that was originally issued back in 2024 has already been -- I've already signed a final judgment of garnishment for that, correct?

MR. PETERS: You did. There's an interesting twist to all of that, and you could hear from Mr. Bernstein, but there has been no disbursement. The

Page 17 — [MR. PETERS continuing]

funds have still been frozen and held. My clients have not been paid. Judgment has not been paid in any way.

So we have re-garnished the accounts because there are still funds being held. Mr. Gnanam and Mrs. Gnanam have

continued filing successive motions, some of which have not been ordered or denied by Your Honor that were ruled on back in October. And I think that's part of the issues we're having why things are still held up. But ultimately, the funds have remained with Wells Fargo and set aside and the garnishment that we've just applied again is applying to the same funds that have been frozen and set aside since November of 2024. And so there is no new money that's being garnished. This is all the old money as far as I understand it.

THE COURT: So essentially, the plaintiffs are just trying to get that money dispersed again and the writ was reissued because of the timing.

MR. PETERS: Well, there's additional funds that were due the plaintiff as far as interest and additional judgments that have been entered. So we're trying to capture all the money that's been set aside by Wells Fargo, not just part of it.

APPENDIX Z-3-B – Motion to Strike Denied Without Hearing

January 8, 2026 Hearing Transcript — page 58, line 21 through page 59, line 13

Petitioners' Motion to Strike (D#276) challenged Respondents' counsel's affidavit, the only sworn answer filed to the Claim of Exemption, as incompetent (Appendices Y; X.24). The motion was never called or argued at the hearing. At its close, on an inquiry from the Garnishee's counsel, the trial court denies it in two words: "It is."

Page 58

THE COURT: Okay. I believe at this point then this concludes the hearing. Mr. Peters, if you will send me an order related to today's -- well, actually, I will enter the order denying the Claim of Exemption for today. I will

Page 59 — [THE COURT continuing]

also enter order -- an order denying any outstanding motions that were filed that are -- that have confused or stopped the ability of the bank to distribute the final garnishment, which has already been entered. I believe that takes care of everything?

MR. BERNSTEIN: Yeah. The only other thing, Your Honor, is that the pro se defendant also filed a Motion to Strike Plaintiff's affidavit in denial of this. So presuming that that's being denied as well in addition to denying the Claim of Exemption?

THE COURT: It is.

MR. BERNSTEIN: Got it. And so that would wrap up that then.