

IN THE CIRCUIT COURT OF THE
THIRTEENTH JUDICIAL CIRCUIT IN
AND FOR HILLSBOROUGH COUNTY,
FLORIDA

CIRCUIT CIVIL DIVISION

CASE NO.: 25-CA-004803

DHV VENTURES, LLC, individually,
DHV VENTURES, LLC, derivatively on
behalf of 12540 HWY LLC, d/b/a
STORAGEMAX WICHITA, and DAVID
HEIL, individually,

Plaintiffs,

v.

ACUITY EQUITY HOLDINGS, LLC,
CIELO CASTILLO HOLDINGS II, LLC,
DAVID MINOR, AND GORILLA
EQUITY DEVELOPMENT, LLC,

Defendants.

**PLAINTIFFS' MOTION FOR DEFAULT BY THE CLERK AGAINST
DEFENDANTS, CIELO CASTILLO HOLDINGS II, LLC, AND
GORILLA EQUITY DEVELOPMENT, LLC**

Plaintiffs, DHV Ventures, LLC, individually (“DHV”), DHV Ventures, LLC, derivatively on behalf of 12540 HWY LLC, d/b/a StorageMax Wichita (“12540”), and David Heil, individually (“Mr. Heil”), hereby move the Clerk to enter defaults against Defendants, Cielo Castillo Holdings, II, LLC, and Gorilla Equity Development, LLC (collectively, the “Minor Corporate Defendants”), and state as follows:

1. On May 23, 2025, Plaintiffs filed this matter.

2. On June 27, 2025, the Minor Corporate Defendants' then-counsel accepted service of process for all Defendants and, therein, agreed to file the Minor Corporate Defendants' response to the Complaint on or before July 29, 2025.

3. On July 28, 2025, the Minor Corporate Defendants' then-counsel filed an unopposed motion seeking additional time, through and to August 18, 2025, for the Minor Corporate Defendants to file their response to the Complaint.

4. On July 30, 2025, the Minor Corporate Defendants' then-counsel moved to withdraw their representation of all of the Defendants in this matter.

5. On August 22, 2025, the Court entered an order granting the Minor Corporate Defendants' then-counsel's Motion to Withdraw. Importantly, the order of withdrawal stated as follows:

"Defendants have thirty (30) days from the entry of this Order to retain substitute counsel; Otherwise, David Minor shall be deemed to be proceeding in a *pro se* capacity." The withdrawal order also stated that "[c]orporate entities may not represent themselves in Florida. Failure of the limited liability companies to retain counsel may result in the striking of their pleadings."

6. Here, the Minor Corporate Defendants have failed to retain counsel to represent them in this action.

7. That said, the Minor Corporate Defendants have not filed any pleadings and, as a result, there is nothing to strike.

8. Nevertheless, the Minor Corporate Defendants have failed to file or serve any paper as required by law.

9. As a result, defaults should be entered against them.

WHEREFORE, Plaintiffs, DHV Ventures, LLC, individually, DHV Ventures, LLC, derivatively on behalf of 12540 HWY LLC, d/b/a StorageMax Wichita, and David Heil,

individually, respectfully request that the Court enter defaults against Defendants, Cielo Castillo Holdings II, LLC and Gorilla Equity Development, LLC, and grant Plaintiffs such other and further relief as the Court deems just, equitable and proper.

Dated: this 18th day of November, 2025. .

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 18th day of November, 2025, pursuant to Fla. R. Jud. Admin. 2.516 I electronically filed the foregoing document with the Clerk of the Court using the Florida Courts E-Filing Portal and that a true and correct copy of the foregoing will be served on all Defendants in the manner listed below.

Respectfully submitted,

**NELSON MULLINS RILEY &
SCARBOROUGH, LLP**

Counsel for the Plaintiffs

1905 NW Corporate Boulevard, Suite 310

Boca Raton, Florida 33431

T: (561) 343-6900 | F: (561) 483-7321

/s/ T.W. Anderson

Terrance W. Anderson, Jr.

Florida Bar No.: 27426

Email (P): tw.anderson@nelsonmullins.com

Email (S): jenny.sica@nelsonmullins.com

**David Minor, individually and on behalf of
Acuity Equity Holdings, LLC, Cielo Castillo Holdings II, LLC
and Gorilla Equity Development, LLC**

401 E. Jackson Street, Suite 3300

Tampa, Florida 33602

david@azurcre.com

Via U.S. Mail and email

IN THE CIRCUIT COURT OF THE
THIRTEENTH JUDICIAL CIRCUIT IN
AND FOR HILLSBOROUGH COUNTY,
FLORIDA

CIRCUIT CIVIL DIVISION

CASE NO.: 25-CA-004803

DHV VENTURES, LLC, individually,
DHV VENTURES, LLC, derivatively on
behalf of 12540 HWY LLC, d/b/a
STORAGEMAX WICHITA, and DAVID
HEIL, individually,

Plaintiffs,

v.

ACUITY EQUITY HOLDINGS, LLC,
CIELO CASTILLO HOLDINGS II, LLC,
DAVID MINOR, AND GORILLA
EQUITY DEVELOPMENT, LLC,

Defendants.

**DEFAULT AGAINST DEFENDANTS, CIELO CASTILLO HOLDINGS II, LLC,
AND GORILLA EQUITY DEVELOPMENT, LLC**

A Default is hereby entered in this action against Defendants, Cielo Castillo Holdings II, LLC and Gorilla Equity Development, LLC, for their failure to serve or file any paper as required by law.

Dated: this _____ day of _____, 2025.

Victor D. Crist
Clerk of the Circuit Court Hillsborough County

By: _____
Deputy Clerk