

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CIRCUIT CIVIL DIVISION: AE

CASE NO.: 50-2025-CA-006024-
XXXX-MB

GORILLA EQUITY DEVELOPMENT,
LLC,

Plaintiff,

v.

STATE STORAGE GROUP, LLC, and
DAVID HEIL,

Defendants.

_____ /

STATE STORAGE GROUP, LLC,
individually and derivatively on behalf of
STATE STORAGE TAMPA BAY, LLC,

Counter-Plaintiff,

v.

GORILLA EQUITY DEVELOPMENT,
LLC,

Counter-Defendant,

_____ /

**COUNTER-PLAINTIFF, STATE STORAGE GROUP, LLC'S, MOTION FOR ENTRY
OF DEFAULT BY THE CLERK AGAINST COUNTER-DEFENDANT,
GORILLA EQUITY DEVELOPMENT, LLC**

Counter-Plaintiff, State Storage Group, LLC ("SSG"), individually and derivatively on
behalf of State Storage Tampa Bay, LLC, hereby moves the Clerk to enter a default against
Counter-Defendant, Gorilla Equity Development, LLC, and states as follows:

1. On or about June 18, 2025, Plaintiff/Counter-Defendant initiation this action.
2. On October 24, 2025, SSG filed its Counterclaim against Plaintiff.

3. Plaintiff has failed to serve any paper on the undersigned in response to the Counterclaim or file any paper as required by law.

4. Accordingly, a default should be entered against Plaintiff on SSG's counterclaim.

WHEREFORE, Counter-Plaintiff, State Storage Group, LLC, individually and/or derivatively on behalf of State Storage Tampa Bay, LLC, hereby respectfully request that the Court enter a default against Plaintiff/Counter-Defendant, Gorilla Equity Development, LLC, and grant SSG such other and further relief as the Court deems just, equitable and proper.

Dated: this 18th day of November, 2025.

Respectfully submitted,

**NELSON MULLINS RILEY &
SCARBOROUGH, LLP**

*Counsel for the Defendants, Counter-Plaintiff,
and Third-Party Plaintiff*

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 18th day of November, 2025, 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 parties to this action in the manner set forth below.

/s/ T.W. Anderson
Terrance W. Anderson, Jr.

SERVICE LIST:

Gorilla Equity Development, LLC

Attn: David Minor

401 E. Jackson Street, Suite 3300

Tampa, Florida 33602

david@azurecre.com

Via U.S. Mail and email

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CIRCUIT CIVIL DIVISION: AE

CASE NO.: 50-2025-CA-006024-
XXXX-MB

GORILLA EQUITY DEVELOPMENT,
LLC,

Plaintiff,

v.

STATE STORAGE GROUP, LLC, and
DAVID HEIL,

Defendants.

_____ /

STATE STORAGE GROUP, LLC,
individually and derivatively on behalf of
STATE STORAGE TAMPA BAY, LLC,

Counter-Plaintiff,

v.

GORILLA EQUITY DEVELOPMENT,
LLC,

Counter-Defendant,

_____ /

DEFAULT AGAINST PLAINTIFF/COUNTER-DEFENDANT,
GORILLA EQUITY DEVELOPMENT, LLC

A Default is hereby entered in this action against Counter-Defendant, Gorilla Equity Development, LLC, for its failure to serve or file any paper as required by law.

Dated: this _____ day of _____, 2025.

Mike Caruso
Clerk of the Circuit Court Palm Beach County

By: _____
Deputy Clerk