

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

NITRO MOBILE SOLUTIONS, LLC,  
a Florida Limited Liability Corporation,

Plaintiff,

v.

Case No.: 17-CA-010953

Division: J

EYE C SOLUTIONS, LLC,  
A Florida Limited Liability Corporation, and  
LISA MONNET, an individual,

Defendants.

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EYE C SOLUTIONS, LLC, and  
LISA MONNET,

Counterclaim Plaintiffs,

v.

NITRO MOBILE SOLUTIONS, LLC,  
PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

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**DEFENDANTS' NOTICE OF SCRIVENER'S ERROR**

Defendants'/Counterclaim Plaintiffs, Eye C Solutions, LLC and Lisa Monnet ("Defendants"), by and through undersigned counsel, and pursuant to Fla. R. Civ. P. 1.540(a), hereby moves this Court to correct a scrivener's error in the Defendants'/Counterclaim Plaintiffs Response to Request for Admissions, dated February 20, 2018, and in support thereof states as follows:

1. On January 29, 2018, the Plaintiff/Counterclaim Defendants filed their First Request for Admissions on Lisa Monnet.

2. On February 20, 2018, the Defendants/Counterclaim Plaintiffs filed their Response to First Request for Admissions.

3. The Plaintiff/Counterclaim-Defendants First Request for Admission, request 7 states: “Admit that you did not receive a PH.D. from Creighton University.”

4. The Defendant, Lisa Monnet, inadvertently denied this response instead of admitting this response based on the wording of the underlying request.

5. Defendant, Lisa Monnet, meant to **Deny** that she has a PH.D. from Creighton University, and while thereby incorrectly denied the request, however, she meant to, and should have, **Admit** that she does not have a PH.D. from Creighton University.

6. Therefore, there is a scrivener’s error contained within the Defendant’s Response to Plaintiff’s First Request for Admission, dated February 20, 2018,, which has just now come to the Defendants/Counterclaim-Plaintiffs attention, and the Defendant, Lisa Monnet, respectfully requests that this Court change Ms. Monnet’s response to request 7 from “Deny”, to “Admit” to correct this scrivener’s error.

**WHEREFORE**, Eye C Solutions, LLC and Lisa Monnet respectfully requests this Court acknowledge this Notice of Scrivener’s Error, changing the response from Request number 7, contained in the Defendant’s Response to First Request for Admissions, dated February 20, 2018, from “Deny” to “**Admit**” and all other relief that this Court deems just and appropriate under the circumstances.

*/s/ LeesaAnn N. Dodds, Esq.*

**LEESAANN N. DODDS, ESQ.**

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the original of the foregoing pleading has been furnished to the Clerk of Court and a copy to Plaintiff/Counter-Defendants Attorney, Dean E. Kent, Esq., [dkent@trenam.com](mailto:dkent@trenam.com); [pholliday@trenam.com](mailto:pholliday@trenam.com); Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A., 2700 Bank of America Plaza, 101 E. Kennedy Blvd., Tampa FL 33602 by e-service on this 10<sup>th</sup> day of September, 2018.

*/s/ LeesaAnn N. Dodds, Esq.*

**LEESAANN N. DODDS, ESQ.**  
Attorney for Defendant's/Counter-Plaintiffs