

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 502013CA006759XXXXMB

LLOYD G. WICKBOLDT,,

Plaintiff,

V.

**SUPPLEMENT TO:
RE-NOTICED FOR HEARING:
Defendant Julie M. Gonzalez's
Motion for Continuance and To
Deny Plaintiff's Motion for Default
and to Strike Pleadings;
Vacating Order of Judge Colin
And Recusal**

JULIE M. GONZALEZ, and AMTRUST BANK,

Defendants,

COMES NOW the Defendant Julie M. Gonzalez pro se who says and prays before this Court as follows:

1. I am the Defendant in this case who is only recently pro se.
2. I am filing this statement and records as a Supplement to the motion recently re-noticed for hearing on August 30th, 2016 at 8:45 am.
3. On this past Friday August, 26, 2016 after I filed the night before on August 25, 2016 to Re-Notice my motion for Continuance on Pre-Trial matters and stated what I believe to be reasonable fears regarding getting a Fair Trial based on actions of Judge Colin who suddenly stepped into this case, I received an Email Notice that came after 4 pm that day that this case was Advanced to start Trial on Sept. 6, 2016.
4. On the day Judge Colin was on the case on August 16, 2016 he had stated that Judge Oftedal was busy with a corporate trial and it might be that this case would not be called up for trial for several weeks anyway as of that date.

5. Even attorney Aragona acknowledges that it was my former lawyer Mr. Dearr who apparently said this case is ready for Trial.
6. This was not my choice or decision and was actions that he took on my behalf but is now no longer representing me so it should not be held against me that my attorney took these actions.
7. I am not even certain that I fully have all my files from Mr. Dearr and have tried to work with attorney Aragona in good faith to mutually work out the scheduling of the case and what needs to be done.
8. I have attached as Exhibit 1 my recent email communications with Mr. Aragona to show this and my actions are not a delay tactic but instead are proper actions by a pro se litigant trying to find an attorney and get familiar with all these rules and to protect my Constitutional rights and liberties.
9. I have explained to Mr. Aragona and am trying to explain to the Court that I need additional time to find an attorney to represent me in this matter and informed Mr. Aragona I was already having conversations with attorneys at least for any deposition and mediation negotiations. which is important for me to have.
10. There is nothing about the case that makes it a great priority in the Court system over other cases waiting and ready for trial.
11. Mr. Aragona has already been granted a Continuance of 30 days in this case before and such a Continuance is reasonable to be granted to myself.
12. Just with the Witnesses alone there needs to be additional time to even start a trial since I was under the belief from Judge Colin that due to Judge Oftedal's busy schedule it would

likely be several weeks until this case was called up for trial and the schedule is now for right after the Labor day.

13. Some of the witnesses are from outside the State of Florida and travel convenience is a significant factor.
14. The Plaintiff's actions by counsel Aragona are extreme and abusive. None of the conduct that has occurred would justify the drastic actions he seeks to strike my pleadings and defenses and this must be denied.
15. There is no reason why if Mr. Aragona is going to be permitted to take my Deposition that I should not have a Fair Right and Fair Opportunity to take the Deposition of Lloyd Wickboldt.
16. I have multiple Witnesses on my List and the Trial will require several days to get through all of my witnesses.
17. The E-Calendar Call Document of August 26, 2016 showed that the Trial Calendar for this period goes from September through October and into November of 2016.
18. The Preferred Trial dates should be the week of October 24th or October 31st, 2016 to give a fair time for me to be fully prepared for Trial.
19. Because I have directly Witnessed Mr. Aragona having improper Ex Parte conversations with Judge David French in the marital Dissolution case, I was reasonable and cautious to question the actions of Judge Colin in this case. In one instance I found out through a Clerk on a Friday that my case was on the Calendar for a Monday and when I showed up on Monday, Mr. Aragona was surprised that I even showed up and even asked me how I found out about the date.

20. It should be shown in my Disqualification motions against Judge French and to the 4th DCA that Judge French's actions compromised the Attorney-Client relationship with Mr. Derr and this should be a factor this Court considers when granting the longest continuance possible at this time.

21. While Mr. Aragona may bring up that I my Writ of Prohibition was recently denied by the 4th DCA on August 26, 2016 which was the same day I got notice that this Court advanced this case to Trial even though I was told Judge Oftedal was very busy and it would be weeks away, I submit that my Writ of Prohibition was proper and respectfully the 4th DCA may be subject to a Writ itself as the denial by that court leads to a complete re-writing of the Rules of Professional Conduct and is in conflict with the Rulings of the Florida Supreme Court concerning the free right to Discharge an attorney with or without cause.

22. I Reserve any and all rights to supplement my filings and modify my filings as law and justice allows.

WHEREFORE, it is respectfully prayed for an Order granting a continuance of at least 30 days and denying Plaintiff's motion to strike my pleadings, Answer, defenses and counterclaims and for such other and further relief as to this Court may seem just and proper.

Dated: August 29th 2016

/s/ Julie M. Gonzalez

Julie M. Gonzalez

PO 8212911

Pembroke Pines, FL 33082

954-245-4653

juliegonzalez64@hotmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent by e-mail service via the Court's e-portal or U.S. Postal Service or email to Counsel and Parties of record listed on the attached Service List this 29th day of August, 2016.

SERVICE LIST

ANTHONY J. ARAGONA III, P.A. Attorney for Lloyd G. Wickboldt 1036 Grove Park Circle
Boynton Beach, Florida 33436 Phone: (561) 649-1790 Facsimile: (56 1) 649-6767

anthony.aragona@att.com

/s/ Julie M. Gonzalez

Julie M. Gonzalez

PO 8212911

Pembroke Pines, FL 33082

954-245-4653

juliegonzalez64@hotmail.com

EXHIBIT 1 - EMAILS OF GOOD FAITH WITH OPPOSING ATTORNEY ARAGONA

From: julia gonzalez <julia.gonzalez85@yahoo.com>
Date: August 29, 2016 at 5:13:38 PM EDT
To: Anthony Aragona <anthony.aragona@att.net>
Subject: Re: Hearing on Tuesd 8/30

Mr Aragona,

As usual you are twisting the truth; you told me these were the dates on that one week to do the scheduling of MY Deposition and Mediation and everything else that u asked me to do. I would hardly say I volunteer , I clearly stated to you that I was looking for counsel and that was the reason for my request for continuance. I told you I would work with you, however you have shown no cooperation; I understand that timing was constrict at that moment, but even Judge Colin had told you that there was a chance that the case was not heard on the 26 of August because of Judge Oftedal Trial schedule for the next weeks. You said that as long as we both agreed to a change it was good; but then even when you knew the hearing for the 26 was cancelled you refused and persisted on keeping the original schedule dates, when you knew I needed a couple of days more to prepare and to secure counsel, agreeing would not have cost you anything except showing a little bit of good will and cooperation. You turn everything into war zone, it is very hard to deal with someone as callous, deceptive and manipulative as you!

You never had an interest in doing what was right, you only were interested in not allowing me counsel, by pressuring me into these dates and denying me time to even schedule your client's Deposition, do I have anything from you, yet? When I said we could schedule Mediation this week I was not asking you to do it, I could have done it and in fact am looking for a Mediator. You show as usual no respect, consideration nor cooperation in this matter

Julie Gonzalez

Sent from my iPhone

On Aug 29, 2016, at 3:26 PM, Anthony Aragona <anthony.aragona@att.net> wrote:

Ms. Gonzalez:

I have already tried to schedule mediation, and your deposition with you, first voluntarily, then pursuant to the Court's Order of August 16, and you seem to have no regard for Court Orders, whether in this matter or in the dissolution case. Whenever you disagree with an Order, or it is too inconvenient for you, you simply try to make up reasons why the judge should be recused, as you have again done here. I spent time finding available mediators, and you refused to comply with the Court ordered date. I am now preparing for trial, and we will abide by whatever the Court order tomorrow.

Anthony J. Aragona, III
Anthony J. Aragona III, P.A.
1036 Grove Park Cir.
Boynton Beach, Florida 33436

Tel: (561) 649-1790

Fax: (561) 649-6767

On Aug 29, 2016, at 1:53 PM, julia gonzalez <julia.gonzalez85@yahoo.com> wrote:

Mr. Aragona ,

We can schedule Mediation for the end of this week. Thursday or Friday; hopefully for Friday.

I wanted to have legal counsel with me during this process. It is my right; and am acting in good faith. I hope you understand,

Your cooperation would be appreciated,

Thank you,

Julie González

Sent from my iPhone

On Aug 29, 2016, at 9:22 AM, Anthony Aragona <anthony.aragona@att.net> wrote:

Ms. Gonzalez:

I do not agree to a continuance, which I do not believe the Court would grant in any event.

Anthony J. Aragona, III

Anthony J. Aragona III, P.A.

1036 Grove Park Cir.

Boynton Beach, Florida 33436

Tel: (561) 649-1790

Fax: (561) 649-6767

On Aug 27, 2016, at 7:32 AM, julia gonzalez <julia.gonzalez85@yahoo.com> wrote:

Mr. Aragona,

I would like to request from you to agree to my request for continuance in court; am in conversation with legal counsel and would like to be represented during negotiations and or mediation. Please let me know soonest, to arrange the appropriate steps to follow,

Thank you very much,

Julie Gonzalez

Sent from my iPhone