

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

CONSTANCE DANIELS,

CASE NO. 18-CA-005749

Plaintiff,

v.

SELECT PORTFOLIO SERVICING, INC.

Defendant.

\_\_\_\_\_ /

**NOTICE OF FILING NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that the Defendant, Select Portfolio Servicing, Inc. (“SPS”), has this day filed a Notice of Removal of this action with the United States District Court for the Middle District of Florida, Tampa Division, under 28 U.S.C. §§ 1332, 1441, and 1446. A true and correct copy of the Notice of Removal is attached hereto as **Exhibit A**.

In accordance with 28 U.S.C. § 1446(d), SPS respectfully requests that this Court proceed no further in this case unless and until this action is remanded.

QUARLES & BRADY LLP

By: /s/ Joseph T. Kohn

Benjamin B. Brown

Florida Bar No. 13290

Joseph T. Kohn

Florida Bar No. 113869

1395 Panther Lane, Suite 300

Naples, FL 34109

239/659-5026 Telephone

239/213-5426 Facsimile

[benjamin.brown@quarles.com](mailto:benjamin.brown@quarles.com)

[joseph.kohn@quarles.com](mailto:joseph.kohn@quarles.com)

[debra.topping@quarles.com](mailto:debra.topping@quarles.com)

[kerlyne.luc@quarles.com](mailto:kerlyne.luc@quarles.com)

[DocketFL@quarles.com](mailto:DocketFL@quarles.com)

*Counsel for Defendant Select Portfolio*

*Servicing, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing Notice of Filing Notice of Removal was filed on July 11, 2018, using the Court's Florida E-filing Portal system and that a true and correct copy of the foregoing was served on the following parties:

Amy E. Cuykendall, Esq.  
Benjamin Hillard, Esq.  
Alexander R. Allred, Esq.  
Castle Law Group, P.A.  
13143 66th Street North  
Largo, FL 33733  
[eservicecastle@gmail.com](mailto:eservicecastle@gmail.com)

/s/Joseph T. Kohn

Joseph T. Kohn

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

CONSTANCE DANIELS,

Plaintiff,

v.

SELECT PORTFOLIO SERVICING, INC.,

Defendant.

CASE NO. \_\_\_\_\_

**NOTICE OF REMOVAL**

The Defendant, Select Portfolio Servicing, Inc. (“SPS”), hereby removes this action from the Thirteenth Judicial Circuit in and for Hillsborough County, Florida, in accord with 28 U.S.C. §§ 1441 and 1446, based on this Court’s diversity jurisdiction under 28 U.S.C. § 1332. In support of removal, SPS respectfully states as follows:

1. On June 14, 2018, the Plaintiff, Constance Daniels (the “**Plaintiff**”), sued SPS in Circuit Court, Civil Division, in and for Hillsborough County, Florida, in the action captioned Constance Daniels v. Select Portfolio Servicing, Inc., and designated as Case Number 18-CA-005749 (the “**State Court Action**”).

2. Removal under Section 1441 is proper because this division encompasses Hillsborough County, Florida, and because this Court has jurisdiction under 28 U.S.C. § 1332. Section 1332 provides original jurisdiction over an action between citizens of different states and in which the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

3. The amount in controversy in this action exceeds \$75,000, exclusive of interest and costs, because, among other reasons, Plaintiff seeks monetary damages in excess of \$80,000. In particular, the Complaint alleges that SPS improperly “increased the principal balance by more

than \$80,000.” (Compl. ¶ 11; id. ¶¶ 14, 21, 24 (alleging that Plaintiff “has suffered damages ... by being expected to pay an additional \$80,000 in principal”) 28, 40; see also id. ¶¶ 34 (seeking an award of treble damages)). Thus, the amount in controversy meets the jurisdictional minimum.

4. Complete diversity exists because the parties are citizens of different states. The Plaintiff is an individual residing in Florida. (Compl. ¶ 1). SPS is the only defendant in this action. SPS is a corporation organized and existing pursuant to the laws of the State of Utah with its principal place of business in Utah. See Declaration of Debra Topping in Support of Defendant’s Notice of Removal, attached hereto as **Exhibit A**. Therefore SPS is a citizen of Utah for purposes of diversity jurisdiction. See 28 U.S.C. § 1332 (providing that “a corporation shall be deemed to be a citizen of every State and foreign state by which it has been incorporated and of the State or foreign state where it has its principal place of business”).

5. This Notice of Removal is timely because it is filed within thirty days of SPS receiving service of the Complaint in the State Court Action. See 28 U.S.C. § 1446(b). SPS received service of the Complaint and Summons in the State Court Action on June 20, 2018. Pursuant to 28 U.S.C. § 1446(a), a true and legible copy of all process and pleadings served in the State Court Action are attached to this notice as **Composite Exhibit B**.

6. Pursuant to 28 U.S.C. 1446(d), SPS served a copy of this notice on each adverse party and filed a copy of this notice with the State court.

7. By filing this notice of removal, SPS waives no defense to dismissal of this action or challenge to the sufficiency of service of process.

**WHEREFORE**, Select Portfolio Servicing, Inc., hereby removes this action to the United States District Court for the Middle District of Florida, Tampa Division.

Dated this 9<sup>th</sup> day of July, 2018.

QUARLES & BRADY LLP

By: /s/ Joseph T. Kohn

Benjamin B. Brown  
Florida Bar No. 13290  
Joseph T. Kohn  
Florida Bar No. 113869  
1395 Panther Lane, Suite 300  
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[kerlyne.luc@quarles.com](mailto:kerlyne.luc@quarles.com)  
[DocketFL@quarles.com](mailto:DocketFL@quarles.com)  
*Counsel for Defendant Select Portfolio  
Servicing, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing was filed on July 9, 2018, using the CM/ECF Portal system and that a true and correct copy of the foregoing was served on the following parties:

Amy E. Cuykendall, Esq.  
Benjamin Hillard, Esq.  
Alexander R. Allred, Esq.  
Castle Law Group, P.A.  
13143 66th Street North  
Largo, FL 33733  
[eservicecastle@gmail.com](mailto:eservicecastle@gmail.com)

/s/ Joseph T. Kohn  
Joseph T. Kohn

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

CONSTANCE DANIELS,

CASE NO. 18-CA-005749

Plaintiff,

v.

SELECT PORTFOLIO SERVICING, INC.

Defendant.

**DECLARATION IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL**

1. My name is Debra Topping. I am over eighteen years of age, and am competent to testify herein. I have personal knowledge of the matters stated in this Declaration.

2. I am a paralegal with the law firm of Quarles & Brady LLP, which represents Defendant Select Portfolio Servicing, Inc. ("SPS") in the above-titled matter.

3. Attached hereto as **Exhibit 1** is the Florida Department of State Division of Corporations Inquiry stating that SPS is a foreign entity whose domicile is in Utah. The document is available at: <http://dos.myflorida.com/sunbiz/search/>.

4. Attached hereto as **Exhibit 2** is the Utah Division of Corporations Business Search result showing that SPS is a Utah domestic corporation whose state of origin is Utah. The document is available at <https://secure.utah.gov/bes/>.

5. The above documents demonstrate that SPS's principal place of business is not located in Florida.

6. I declare this under the penalty of perjury that the foregoing is true and correct.

Dated this 9<sup>th</sup> day of July, 2018.

  
Debra Topping



STATE OF FLORIDA )  
 :  
COUNTY OF COLLIER )

BEFORE ME, the undersigned authority, personally appeared Debra Topping as Paralegal of Quarles & Brady LLP, X who is personally known to me OR produced \_\_\_\_\_ as identification, and, who after being duly sworn, deposes and says that (s)he has read the foregoing Declaration, and (s)he duly acknowledges and swears or affirms before me that said Declaration is true and correct to the best of his/her knowledge and belief.

WITNESS my hand and seal this 9<sup>th</sup> day of July, 2018.



*Kerlyne S. Luc*  
NOTARY PUBLIC  
Printed Name: *Kerlyne S Luc*  
My Commission Number:  
My Commission Expires:



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Detail By Document Number](#) /

### Detail by Entity Name

Foreign Profit Corporation  
SELECT PORTFOLIO SERVICING, INC.

Filing Information

<b>Document Number</b>	F97000001363
<b>FE/EIN Number</b>	87-0465626
<b>Date Filed</b>	03/17/1997
<b>State</b>	UT
<b>Status</b>	ACTIVE
<b>Last Event</b>	NAME CHANGE AMENDMENT
<b>Event Date Filed</b>	07/01/2004
<b>Event Effective Date</b>	NONE

Principal Address

3217 S Decker Lake Drive  
ATTN: COMPLIANCE DEPT  
SAL LAKE CITY, UT 84119

Changed: 04/18/2016

Mailing Address

3217 S Decker Lake Drive  
ATTN: COMPLIANCE DEPT  
SAL LAKE CITY, UT 84119

Changed: 04/18/2016

Registered Agent Name & Address

CORPORATION SERVICE COMPANY  
1201 HAYS STREET  
TALLAHASSEE, FL 32301

Name Changed: 05/20/1998

Address Changed: 05/20/1998

Officer/Director Detail

**Name & Address**

Title P/D

O'BRIEN, TIMOTHY J

EXHIBIT "1"



3217 S Decker Lake Drive  
SALT LAKE CITY, UT 84119

Title CFOT, Director

CROWLEY, JUSTIN  
3217 S Decker Lake Drive  
SALT LAKE CITY, UT 84119

Title S GC

MILLER, JASON H  
3217 S Decker Lake Drive  
SALT LAKE CITY, UT 84119

Title D

REMMERT, JR., PATRICK A  
ELEVEN MADISON AVENUE  
NEW YORK, NY 10010

**Annual Reports**

Report Year	Filed Date
2016	04/18/2016
2017	01/10/2017
2018	01/13/2018

**Document Images**

<a href="#">01/13/2018 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/10/2017 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">04/18/2016 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">03/24/2015 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">02/24/2014 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/23/2013 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/04/2012 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">02/23/2011 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/04/2010 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/14/2009 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/11/2008 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">01/04/2007 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">05/01/2006 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">04/20/2005 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">07/01/2004 -- Name Change</a>	View image in PDF format
<a href="#">01/23/2004 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">03/31/2003 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">04/10/2002 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">02/21/2001 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">04/04/2000 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">03/22/1999 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">07/22/1998 -- ANNUAL REPORT</a>	View image in PDF format

<a href="#">05/20/1998 -- Reg. Agent Change</a>	<a href="#">View image in PDF format</a>
<a href="#">07/03/1997 -- ADDRESS CHANGE</a>	<a href="#">View image in PDF format</a>

Florida Department of State, Division of Corporations

**SELECT PORTFOLIO SERVICING, INC.**

[Update this Business](#)

**Entity Number:** 1026229-0142

**Company Type:** Corporation - Domestic - Profit

**Address:** 3217 S DECKER LAKE DR SALT LAKE CITY, UT 84119

**State of Origin:** UT

**Registered Agent:** JASON H MILLER

**Registered Agent Address:**

3217 S DECKER LAKE DR  
SALT LAKE CITY, UT 84119

[View Management Team](#)

Status: Active

[Purchase Certificate of Existence](#)

**Status:** Active  as of 09/20/2001

**Renew By:** 02/28/2019

**Status Description:** Current

The "Current" status represents that a renewal has been filed, within the most recent renewal period, with the Division of Corporations and Commercial Code.

**Employment Verification:** Not Registered with Verify Utah

History

[View Filed Documents](#)

**Registration Date:** 02/24/1989

**Last Renewed:** 01/02/2018

Additional Information

**NAICS Code:** 5614 **NAICS Title:** 5614-Business Support Services

Former Business Names

SELECT PORTFOLIO SERVICING, INC.  
FAIRBANKS CAPITAL CORP.  
FAIRBANKS CAPITAL CORP.

<< Back to Search Results

Search by:

Business Name:

EXHIBIT "2"

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

CONSTANCE DANIELS,  
Plaintiff,

CASE NO.: 18-CA-5749

vs.

DIV G

SELECT PORTFOLIO SERVICING, INC.,  
Defendant.

TO: **SELECT PORTFOLIO SERVICING, INC.**  
C/O CORPORATION SERVICE COMPANY  
1201 HAYS STREET  
TALLAHASSEE, FL 32301

**SUMMONS**  
**IMPORTANT**

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint with the clerk of this court. A phone call will not protect you. Your written response including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

**Benjamin Hillard, Esq.**  
**CASTLE LAW GROUP, P.A.**  
13143 66<sup>th</sup> Street  
Largo, Florida 33773  
Telephone: (727) 536-8882  
Facsimile: (727) 536-7739

THE STATE OF FLORIDA  
TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on 06/18/2018, 2018.

(SEAL)

CLERK OF THE COURT



By Lisa Mangual  
Deputy Clerk



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

WELLS FARGO BANK, N.A.  
**Plaintiff**

**Case No:** 10-CA-013411

VS.

**Division:** M

CONSTANCE DANIELS ; BLOOMINGDALE HOA INC  
**Defendant**

**ORDER GRANTING DEFENDANT'S MOTION TO ENFORCE LOAN MODIFICATION  
AGREEMENT**

THIS CAUSE came before the Court on July 20, 2015 for an evidentiary hearing on Defendant Constance Daniels' Motion to Enforce Loan Modification Agreement, and the Court having heard testimony of the parties and their witnesses, argument of counsel, and being otherwise fully informed in the premises, finds as follows:

1. On March 23, 2015 a hearing was held by this Court on Defendant's Motion to Enforce Settlement Agreement or for Summary Judgment. On April 30, 2015 this Court entered an order denying Defendant's motion to enforce the settlement agreement based upon a factual dispute between the parties over whether an enforceable contract exists and, if so, whether there was a breach of said contract by Defendant's failure to make the payments required under the terms of the contract. At the March 23rd hearing, the parties agreed to a resolution of the issue by the Court at an evidentiary hearing to be held on July 20, 2015.

2. The Court finds, based upon the evidence presented, that the parties entered into an agreement for modification of the loan agreement, that payments were made by Defendant according to the terms of the modification agreement, and that Defendant is entitled to enforce the contract.

IT IS THEREFORE ORDERED AND ADJUDGED that Defendant's Motion to Enforce Loan Modification Agreement is GRANTED.

Done and Ordered in Hillsborough County, Florida this 27th day of December, 2015.

ELECTRONICALLY CONFORMED  
12/27/2015

Sandra Taylor, Judge

Copies Furnished To:

**Plaintiff**

WELLS FARGO BANK, N.A.  
C/O CORPORATION SERVICE CO, R.A.  
503 S PIERRE ST  
PIERRE, SD 57501

**Defendant**

Attorney: LINDA COURTNEY CLARK  
LINDA C CLARK P A  
12233 N FLORIDA AVE STE 201  
TAMPA, FL 33612

Attorney: CHRISTOPHER CARROLL OBRIEN  
485 N KELLER RD STE 401  
MAITLAND, FL 32751

CONSTANCE DANIELS  
3927 DUNAIRE LN  
VALRICO, FL 33596



BLOOMINGDALE HOA INC  
C/O GEORGE MAY IV, RA  
3509 BELL SHOALS RD  
VALRICO, FL 33596

Attorney: ALEXANDER REED ALLRED  
13143 66TH ST  
LARGO, FL 33773

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

WELLS FARGO BANK, N.A. ON  
BEHALF OF THE  
CERTIFICATEHOLDERS PARK  
PLACE SECURITIES, INC. ASSET-  
BACKED PASS-THROUGH  
CERTIFICATES SERIES 2005-WCW1,

CASE NO: 2010-CA-013411

Plaintiff

v.

CONSTANCE DANIELS; ET. AL.,

Defendant(s),

---

**ORDER ON DEFENDANT'S MOTION  
FOR CLARIFICATION AND FOR SANCTIONS,  
DEFENDANT'S MOTION FOR ATTORNEYS' FEES, AND  
PLAINTIFF'S MOTION TO DEPOSIT FUNDS IN THE COURT REGISTRY**

THIS CAUSE having come before the Court on Defendant's Motion for Clarification and for Sanctions, Defendant's Motion for Attorneys' Fees, and Plaintiff's Motion to Deposit Funds in the Court Registry heard on March 28, 2016, and the Court being otherwise duly advised in the premises, it is hereby

**ORDERED AND ADJUDGED:**

1. Plaintiff, as a sanction, shall waive interest on the Loan Modification, enforced in this Court's Order dated December 27, 2015, from August 1, 2010 through December 27, 2015.
2. Plaintiff, as a sanction, will pay the Defendant's Attorneys' Fees in bringing the Motion to Enforce Loan Modification, filed on November 12, 2014, said amount to be determined at a later date.
3. The Defendant shall begin making payments pursuant to the Loan Modification Agreement on April 27, 2016, which will be for the May 1, 2016 payment. The Defendant's new payments will be calculated by Plaintiff pursuant to the interest rates set forth in the Loan Modification Agreement, which were scheduled to change each year. In addition, the interest

due from payments for the period of January 1, 2016 through April 1, 2016 will be added to the end of the Loan Modification Agreement as well as the principal and escrow payments for the period of August 1, 2010 through April 1, 2016.

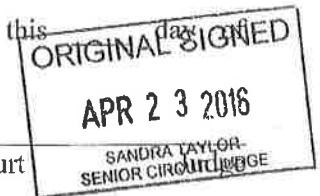
4. The Court reserves as to Defendant's entitlement to Attorneys' Fees

5. The Defendant's Motion for Attorneys' Fees shall be reset by the Defendant at such time the Court determines appropriate.

DONE AND ORDERED in Hillsborough County, Florida this \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
Circuit

\_\_\_\_\_  
Court



Copies:

TERIS A BEST  
PEARSON BITMAN, LLP  
485 N. KELLER ROAD, SUITE 401  
MAITLAND, FL 32751  
TBEST@PEARSONBITMAN.COM  
JNOVAIS@PEARSONBITMAN.COM  
*Counsel for Plaintiff*

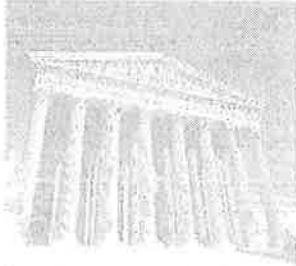
ALEX ALLRED  
CASTLE LAW GROUP, P.A.  
13143 66TH STREET NORTH  
LARGO, FL 33773  
BENHILLARDESQUIRE@GMAIL.COM  
ESERVICECASTLE@GMAIL.COM  
*Counsel for Defendant Constance Daniels*

COLLEEN M. DAVIS  
ASSISTANT UNITED STATES ATTORNEY  
400 NORTH TAMPA STREET, SUITE 3200  
TAMPA, FL 33602  
USAFLM.STATE.FORECLOSURES@USDOJ.GOV  
*Counsel for Counsel for Defendant, USA-Department of Treasury*



# CASTLE LAW GROUP

Castle Law Group, P.A.



13143 66<sup>th</sup> Street North  
Largo, Florida 33773  
Telephone: (727) 536-8882  
Facsimile: (727) 536-7739

October 2, 2017

Select Portfolio Servicing, Inc.  
P.O. Box 85250  
Salt Lake City, UT 84165-0250

Sent via Regular U.S. Mail

**RE: Borrower: Constance Daniels**  
**Account Number: [REDACTED]**  
**Property Address: 3927 Dunaire Drive, Valrico, FL 33596**

To Whom It May Concern:

This office represents Ms. Constance Daniels with regards to the above-mentioned property address. Please allow this letter to serve as a written request for a line-by-line breakdown of the deferred balance. Per the Loan Modification Agreement, it does not provide for a deferred balance. Therefore, please provide a line-by-line breakdown and your basis for charging the same.

If you should have any questions, please feel free to contact our office.

Sincerely,  
Castle Law Group, P.A.

  
Benjamin Hillard, Esquire

BH/tlg

cc: Client

**EXHIBIT**

**COMPOSITE C**

exhibitstickers.com

# CASTLE LAW GROUP

Castle Law Group, P.A.



13143 66<sup>th</sup> Street North  
Largo, Florida 33773  
Telephone: (727) 536-8882  
Facsimile: (727) 536-7739

December 22, 2017

Select Portfolio Servicing, Inc.  
P.O. Box 85250  
Salt Lake City, UT 84165-0250

**Sent via Fax: 801-801-8011**  
**and Regular U.S. Mail**

Select Portfolio Servicing, Inc.  
3217 S. Decker Lake Dr.  
Salt Lake City, UT 584165

**RE: Borrower: Constance Daniels**  
**Account Number: [REDACTED]**  
**Property Address: 3927 Dunaire Drive, Valrico, FL 33596**

To Whom It May Concern:

This office represents Ms. Constance Daniels with regard to the above-mentioned loan. We previously sent a demand letter dated October 2, 2017 requesting that you provide a line-by-line breakdown of the alleged deferred balance you are carrying on Ms. Daniel's mortgage statements.

As you know, the loan modification does not include a deferred principal balance. A copy of the Loan Modification is attached hereto for your convenience. Therefore, I suggest you either remove the deferred balance from Ms. Daniels' mortgage statements and any demand thereto, or provide a line-by-line breakdown and supporting documentation. If you choose to maintain a demand for a deferred principal balance, and do not provide the line-by-line breakdown and supporting documentation, we shall assume that such deferred principal balance demand amount is without merit and we will file suit accordingly. If we have to file a lawsuit, we will seek attorneys fees based on your lack of providing a suitable response. Please conduct yourselves accordingly.

If you should have any questions, please feel free to contact our office.

Sincerely,  
Castle Law Group, P.A.

  
Benjamin Hillard, Esquire

cc: Client