



MEMORANDUM

Office of the City Attorney

Phone: 334-5011/Fax 334-2229
Box 46

CONSENT

TO: Mayor and Commission

DATE: March 13, 2000

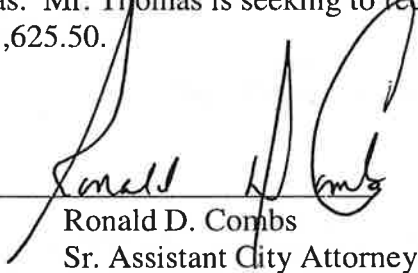
FROM: Marion J. Radson, City Attorney

SUBJECT: **ABRA J. THOMAS V. GAINESVILLE POLICE DEPARTMENT, &
PAUL D. FORSBERG CASE NO.: 99-CC-2202**

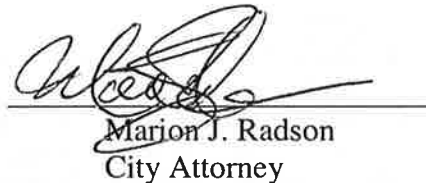
Recommendation: The City Commission authorize the City Attorney and/or Special Counsel if insurance coverage is available, to represent the City in the case styled Abra J. Thomas v. Gainesville Police Department, & Paul D. Forsberg; Case No.: 99-CC-2202.

On February 25, 2000, the City of Gainesville received a Summons and Complaint filed by Abra J. Thomas. Mr. Thomas is seeking to recover possession of personal property believed to be valued at \$5,625.50.

Prepared by:


Ronald D. Combs
Sr. Assistant City Attorney

Approved and
Submitted by:


Marion J. Radson
City Attorney

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT, IN AND FOR ALACHUA COUNTY, FLORIDA
ALACHUA COUNTY COURTHOUSE, 201 E. UNIVERSITY AVE., P.O. BOX 600, GAINESVILLE, FLORIDA 32602

Case No.: 99-CC-2202

Division: IV

Abra S. Thomas
PLAINTIFF
-VS- Gainesville Police Department
DEFENDANT
Paul D. Forsburg

A TRUE COPY
STEPHEN M. GELBORN, SHERIFF
ALACHUA COUNTY, FLORIDA
Served at 7:30 AM, on the 25 day
of February, 2000
By [Signature]
Deputy Sheriff

SUMMONS / PERSONAL SERVICE OF AN INDIVIDUAL

THE STATE OF FLORIDA:

TO EACH SHERIFF OF THE STATE: You are hereby commanded to serve this Summons and a copy of the Complaint or Petition in this lawsuit on the below-named Defendant:

Paul D. Foreburg
C/O Gainesville Police Department
721 NW 6th Street
Gainesville, FL 32601

WITNESS my hand and seal of this Court this 16 day of February, 2000.

J.K. "Buddy" Irby
Clerk of the Circuit Court



BY: [Signature]

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 your 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.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Alachua County Court Administrator at (352) 374-3648, within 2 working days of your receipt of this summons. If you are hearing or voice impaired, call 1-800-955-8771.

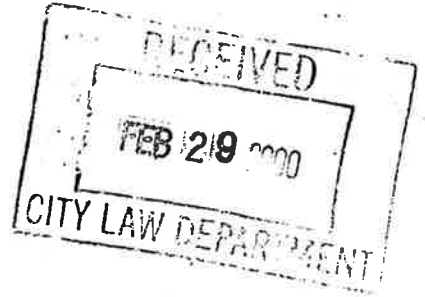
Abra S. Thomas
PLAINTIFF/PLAINTIFF'S ATTORNEY
Reg. 09900-017 F.C.C. - Coleman - med
P.O. Box 879
Coleman, Florida 33521-0879
ADDRESS
FLORIDA BAR NUMBER

IN AND FOR THE EIGHTH JUDICIAL CIRCUIT
COURT IN AND FOR ALACHUE COUNTY, FLA.

COUNTY-
CIVIL DIVISION

ABRA J. THOMAS,

Plaintiff,



Vs.

CASE NO. _____

GAINESVILLE POLICE DEPARTMENT, &
PAUL D. FORSBERG,

Defendant.

REPLEVEN COMPLAINT

The Plaintiff, ABRA J. THOMAS, sues defendant(s)
GAINESVILLE POLICE DEPARTMENT & PAUL D. FORSBERG, and alleges:

1. This is an action to recover possession of personal property in the Alachue County, Florida.
2. The description of the property is:
 Wallet, ID, personal papers, and \$200.00 U.S. Currency
 Black Memo Book
 Carry Bag, with personal items
 \$3,760 in U.S. Currency
 \$4.55 in U.S. Currency
 Savings Receipt & Book, Bag with \$405.43, 125.65 & \$219.00 U.S. Cas
 To the best of plaintiff's knowledge, information, and belief, the value of the property is \$ \$5,625.50.
3. Plaintiff is entitled to possession of the property under "Right to possess." Since, the Plaintiff is the rightful owner of the said listed property.

4. To plaintiff's best knowledge, information, and belief, the property is located at:

5. The property is wrongfully detained by the defendant(s). Defendant(s) came into possession of the property by investigative means.

To plaintiff's best knowledge, information, and belief, defendant(s) detains the property because They think Plaintiff will not claim same.

6. The property has not been lawfully been taken for any tax, assessment, or fines pursuant to law.

7. The property has not been taken under an execution or attachment against plaintiff's property.

WHEREFORE, plaintiff demands judgment for possession of the foregoing listed property. Furthermore, the Plaintiff would also request the Costs of this action.

Respectfully submitted,

Abra J. Thomas
ABRA J. THOMAS,
F.C.C.-COLEMAN-MED-
P. O. Box 879
Coleman, Florida 33521-0879

5/7/99
Plaintiff