

IN THE COUNTY COURT OF THE EIGHTH JUDICIAL CIRCUIT,
IN AND FOR ALACHUA COUNTY, FLORIDA
201 East University Avenue
Gainesville Florida 32601
(352) 374-3636

Lottie Withey
PLAINTIFF

Case No.: 2020-SC-261

3090 SE 21st Ave
Gainesville FL 32601 Address
352-359-9496
Phone

Division: _____

vs
Harvey L Ward Sr
DEFENDANT
2701 NW 23rd Blvd P124
Gainesville FL 32605 Address
352-665-9409
Phone

Harvey L Ward Jr
DEFENDANT
P.O. Box 350254 2701
Gainesville FL 32605 Address NW 23rd
Blvd
P124
Phone

STATEMENT CLAIM
(General)

Plaintiff(s), Lottie Withey
sue(s) Defendant(s), Harvey L Ward Sr, Harvey Ward Jr and alleges:

see attachment

FILED
OK 39
JAN 23 PM 12:18
JESSIE IRBY, ESQ.
CLERK OF COURTS
ALACHUA COUNTY, FL

If a Defendant is to be served with process outside the State of Florida, see Exhibit "A", attached.

WHEREFORE, Plaintiff(s) demands judgment for damages against defendant(s) in the amount of \$ 5000.00
principal, plus \$ 0 interest, plus \$ 0 service charge, plus \$ 0 court costs.

Lottie Withey
PLAINTIFF(S)



#5000.00

Harvey Ward Sr, Harvey Ward Sr

Job
duties

Frankie Withey drove Harvey Ward Sr anywhere that he wanted to go. Mr. Withey also drove all the tenants out 7320 N.E. 19th Ave everywhere that they had to go. Frankie also emptied the full urinal during the night instead of sleeping. Lottie Withey did all the cleaning, laundry, and both of them took care of them from intestinal surgery wound care, as well as giving him enemas as needed. Lottie Withey took care of his medicine boxes that had to be filled weekly.

Frankie & Lottie Withey supplied all the food for the apt P124 at Madison Pt for Harvey Ward Sr. Mr. Ward did not try to offer to reimburse or help to get them any of the money back.

Mrs Withey purchased parts for Mr Ward's 1999 Ford Explorer in Sept 2019 in the amount of 107.00 that were delivered to the Madison Pointe Apt. P124. Mrs Withey does still have the receipts. Mr. Ward

has not paid for the parts as of the day these papers were filed. Frankie Withey also did labor on the floor of the kitchen at the trailer located at 7320 NE 19th Ave and was not paid for it. Frankie also worked on the property for two months and was not paid for it. Mr. Ward would get loans from Mrs. Withey when she would go work from some one else and not give the money back or even pay Mr + Mrs Withey (40.00) (20. gas) (10.00 labor or expenses). Mr. Ward would call Mr + Mrs Withey out of their names constantly when they were on call 24 hour a day even when at Palm Gardens Nursing Home and at Skanska according to Harvey Ward Sr.

Mr. Ward pulled a gun on Mr Withey at 7320 NE 19th Ave when Mrs Withey was walking back up to Mr Ward was questioning his upbringing. The incident was witnessed by Brian Powers employed by Collier Company. That was the same evening that the couple was asked to leave the apartment and the

allegedly
witnessed

property not to return. When Mr Withey was trying to retrieve the parts he was told by Mr Max Ward if the parts were removed they would not get the money back. The Witheys RV was moved off the property the following morning by Max towing Driver Driver Dwayne Hicks 85.00. Mr + Mrs Withey also got their property from the apartment. Since moving from Mr Ward premises the couple have had to move again. Mr Ward went by where they were towed to and asked about where they went and found out the vicinity and goes by from time to time. Mr Ward has contacted Mr + Mrs Withey accusing them of stealing a gun and a knife from the apartment.

There have been several attempts to keep this matter out of the courts. ~~the~~ Mr + Mrs Withey have tried to collect from Mr Ward as Mr Ward illegally evicted the Witheys.