

IN THE DISTRICT COURT  
OF APPEAL OF FLORIDA,  
THIRD DISTRICT

APPEAL CASE NO. 3D-19-2464

L.T. CASE NO. 2011-01606 CA (31)

SOUTH FLORIDA YACHT SALES, INC.,  
LAZARO RALPH NAVARRO,  
MYI INTERNATIONAL, LLC,  
RALPH NAVARRO REVOCABLE  
LIVING TRUST, and KRC FAMILY  
LIMITED LIABILITY LIMITED  
PARTNERSHIP,

Petitioners,

v.

GE COMMERCIAL DISTRIBUTIONS  
FINANCE CORPORATION,

Respondent.

FILED  
CLERK DISTRICT COURT OF  
APPEAL THIRD DISTRICT  
2020 MAR -5 AM 9:42

**NOTICE TO INVOKE DISCRETIONARY JURISDICTION**

NOTICE IS GIVEN that LAZARO RALPH NAVARRO, MYI INTERNATIONAL, LLC, RALPH NAVARRO REVOCABLE LIVING TRUST, and KRC FAMILY LIMITED LIABILITY LIMITED PARTNERSHIP, Petitioners, invoke the discretionary jurisdiction of the Florida Supreme Court to review the decision of this court rendered on February 5, 2020 denying Petitioners' Petition for Writ of Certiorari regarding the lower court's departure from the essential requirements of law and failing to make findings of fact as to motion(s) for protective order regarding depositions of material witnesses. (A copy is

**KAREN B. PARKER, P.A.**

One Datan Center, 9100 So. Dadeland Boulevard, Suite 514, Miami, Florida 33156 (305) 400-9149

RECEIVED 03/05/2020 12:01 pm FLORIDA SUPREME COURT

RECEIVED, 03/04/2020 02:18:32 PM, Clerk, Supreme Court

attached hereto). The decision is within the Florida Supreme Court's jurisdiction because it expressly and directly conflicts with Reeves v. Fleetwood Homes of Florida, Inc., 889 So. 2d 812, 822 (Fla. 2004); Allstate Ins. Co. v. Langston, 655 So. 2d 91, 94 (Fla. 1995); Accord Columbia v. Brown, 902 So. 2d 838, 840 (Fla. 1st DCA 2005); Greyhound Lines, Inc. v. Jackson, 445 So. 2d 1107, 1108 (Fla. 4th DCA 1984); Everglades Protective Syndicate v. Makinney, 391 So. 2d 262, 263 (Fla. 4th DCA 1981) and Nucci v. Simmons, 20 So.3d 388, 390 (Fla. 2d DCA 2009) on the same question of law.

### **CERTIFICATE OF SERVICE**

**WE HEREBY CERTIFY** that a true and correct copy of the foregoing was served this 4<sup>th</sup> day of March, 2020 to all parties identified on the Florida E-Portal including Liben M Amedie, Esq., Attorney for Plaintiff, [liben@libenlaw.com](mailto:liben@libenlaw.com); James Moloney, Esq., Attorney for Plaintiff, [jmoloney@lathropgage.com](mailto:jmoloney@lathropgage.com).

KAREN B. PARKER, P.A.  
Attorney for the Defendants/Petitioners  
One Datan Center, Suite 514  
9100 So. Dadeland Boulevard  
Miami, Florida 33156  
Telephone: (305)400-9149

By: Karen B. Parker  
KAREN B. PARKER, ESQ.  
Florida Bar No.: 054482  
[kparker@kbparkerlaw.com](mailto:kparker@kbparkerlaw.com)  
[fmartinez@kbparkerlaw.com](mailto:fmartinez@kbparkerlaw.com)

IN THE DISTRICT COURT OF APPEAL  
OF FLORIDA  
THIRD DISTRICT  
FEBRUARY 05, 2020


SOUTH FLORIDA YACHT SALES,  
INC., et al.,  
Appellant(s)/Petitioner(s),  
vs.  
GE COMMERCIAL DISTRIBUTIONS  
FINANCE CORPORATION,  
Appellee(s)/Respondent(s),

CASE NO.: 3D19-2464

L.T. NO.: 11-1606

Following review of the Petition for Writ of Certiorari and the Response thereto, it is ordered that said Petition is hereby denied.

SALTER, FERNANDEZ and LOBREE, JJ., concur.

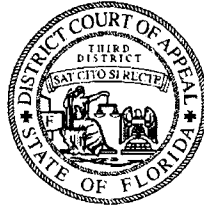
A True Copy  
ATTEST  
  
CLERK  
DISTRICT COURT OF APPEAL  
THIRD DISTRICT

cc: Karen B. Parker

Liben M. Amedie

Hon. Spencer Eig

ns



KEVIN EMAS  
CHIEF JUDGE  
VANCE E. SALTER  
IVAN F. FERNANDEZ  
THOMAS LOGUE  
EDWIN A. SCALES, III  
NORMA LINDSEY  
ERIC WM. HENDON  
BRONWYN C. MILLER  
MONICA GORDO  
FLEUR J. LOBREE  
JUDGES

DISTRICT COURT OF APPEAL  
THIRD DISTRICT  
2001 S.W. 117 AVENUE  
MIAMI, FLORIDA 33175-1716

MERCEDES M. PRIETO  
CLERK  
VERONICA ANTONOFF  
MARSHAL  
DEBBIE MCCURDY  
CHIEF DEPUTY CLERK  
MARIA MIHAIC  
CHIEF DEPUTY MARSHAL

TELEPHONE (305) 229-3200

March 5, 2020

Re: South Florida Yacht Sales, Inc., et al.,  
v.  
GE Commercial Distributions Finance Corporation  
Appeal No.: 3D19-2464  
Trial Court No.: 11-1606  
Trial Court Judge: Spencer Eig

Dear Mr. Tomasio:

Attached is a certified copy of the Notice invoking the discretionary jurisdiction of the Supreme Court pursuant to Rule 9.120, Florida Rules of Appellate Procedure. Attached also is this Court's opinion or decision relevant to this case.

\_\_\_\_\_ The filing fee prescribed by Section 25.241(3), Florida Statutes, was received by this Court and is also attached.

X  The filing fee prescribed by Section 25.241(3), Florida Statutes, was not received by this Court.

\_\_\_\_\_ Petitioner/Appellant has previously been determined insolvent by the circuit court or our court in the underlying case.

\_\_\_\_\_ Petitioner/Appellant has already filed, and this court has granted, petitioner/appellant's motion to proceed without payment of costs in this case.


No filing fee is required because:

- \_\_\_\_\_ Summary Appeal (Rule 9.141)
- \_\_\_\_\_ Unemployment Appeal Commission
- \_\_\_\_\_ Habeas Corpus
- \_\_\_\_\_ Juvenile Case
- \_\_\_\_\_ Other:

If there are any questions regarding this matter, please do not hesitate to contact this Office.

Sincerely,

MERCEDES M. PRIETO  
Clerk, Third District Court of Appeal

By:   
DEPUTY CLERK

