

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL
CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.

MARIYA STANISHEVSKAYA,

Plaintiff,

vs.

AXXYEHHO LLC; UNKNOWN OCCUPANT IN POSSESSION

#1; UNKNOWN OCCUPANT IN POSSESSION #2; and

UNKNOWN OCCUPANT IN POSSESSION #3, if living, and if

dead, their unknown spouses, estates, widows, heirs, devisees,

beneficiaries, grantors, creditors, grantees, and all parties having or

claiming by, through, under or against any and all persons claiming

any right, title, interest, claim, lien, estate or demand against the

named Defendants in regard to the subject property,

Defendants.

VERIFIED MORTGAGE FORECLOSURE COMPLAINT

Plaintiff, MARIYA STANISHEVSKAYA, by and through its undersigned attorney, sues Defendants, AXXYEHHO LLC; UNKNOWN OCCUPANT IN POSSESSION #1; UNKNOWN OCCUPANT IN POSSESSION #2; and UNKNOWN OCCUPANT IN POSSESSION #3, if living, and if dead, their unknown spouses, estates, widows, heirs, devisees, beneficiaries, grantors, creditors, grantees, and all parties having or claiming by, through, under or against any and all persons claiming any right, title, interest, claim, lien, estate or demand against the named Defendants in regard to the subject property, and alleges:

1. This is an action to foreclose a mortgage on residential real property ("Property") located and situated in Broward County, Florida.

2. All parties to this action are properly before this Court and this Court has personal jurisdiction over the parties.

3. All conditions precedent to the filing of this action have been met by Plaintiff, or are waived, useless or futile.

4. On February 2, 2023, Defendant, AXXYEHHO LLC ("MORTGAGOR"), made, executed, and delivered a promissory Mortgage Note("Note") and a Mortgage Deed ("Mortgage") securing payment of the Note in favor of Plaintiff. Both the Note and the Mortgage were recorded in Official Records Instrument No. 120315954 of the Public Records of Broward County, Florida, and mortgaged the property described in the Mortgage then owned by MORTGAGOR. True and correct copy of the above recorded instrument containing the Note and the Mortgage is attached as Exhibits "A."

5. Plaintiff holds and owns the original Note secured by the Mortgage and is entitled to foreclosure pursuant to Section 673.3011(1), Florida Statute.

6. The Mortgage is a lien superior in dignity to any prior or subsequent right, title, claim, lien or interest arising out of MORTGAGOR and the MORTGAGOR's predecessor in interest.

7. The subject property is now owned by MORTGAGOR and the record legal title to said property is now vested in MORTGAGOR.

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL
CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO. CACE-25-012484

MARIYA STANISHEVSKAYA,

Plaintiff,

vs.

AXXYEHHO LLC; UNKNOWN OCCUPANT IN POSSESSION
#1; UNKNOWN OCCUPANT IN POSSESSION #2; and
UNKNOWN OCCUPANT IN POSSESSION #3, if living, and if
dead, their unknown spouses, estates, widows, heirs, devisees,
beneficiaries, grantors, creditors, grantees, and all parties having or
claiming by, through, under or against any and all persons claiming
any right, title, interest, claim, lien, estate or demand against the
named Defendants in regard to the subject property,

Defendants.

VERIFIED AMENDED MORTGAGE FORECLOSURE COMPLAINT

Plaintiff, MARIYA STANISHEVSKAYA, by and through its undersigned attorney, sues Defendants, AXXYEHHO LLC; UNKNOWN OCCUPANT IN POSSESSION #1; UNKNOWN OCCUPANT IN POSSESSION #2; and UNKNOWN OCCUPANT IN POSSESSION #3, if living, and if dead, their unknown spouses, estates, widows, heirs, devisees, beneficiaries, grantors, creditors, grantees, and all parties having or claiming by, through, under or against any and all persons claiming any right, title, interest, claim, lien, estate or demand against the named Defendants in regard to the subject property, and alleges:

1. This is an action to foreclose a mortgage on residential real property ("Property") located and situated in Broward County, Florida.
2. All parties to this action are properly before this Court and this Court has personal jurisdiction over the parties.
3. All conditions precedent to the filing of this action have been met by Plaintiff, or are waived, useless or futile.
4. On February 2, 2023, Defendant, AXXYEHHO LLC ("MORTGAGOR"), made, executed, and delivered a promissory Mortgage Note ("Note") and a Mortgage Deed ("Mortgage") securing payment of the Note in favor of Plaintiff. Both the Note and the Mortgage were recorded in Official Records Instrument No. 120315954 of the Public Records of Broward County, Florida, and mortgaged the property described in the Mortgage then owned by MORTGAGOR. True and correct copy of the above recorded instrument containing the Note and the Mortgage is attached as Exhibits "A."
5. Plaintiff holds and owns the original Note secured by the Mortgage and is entitled to foreclosure pursuant to Section 673.3011(1), Florida Statute.
6. The Mortgage is a lien superior in dignity to any prior or subsequent right, title, claim, lien or interest arising out of MORTGAGOR and the MORTGAGOR's predecessor in interest.
7. The subject property is now owned by MORTGAGOR and the record legal title to said property is now vested in MORTGAGOR.