

MOTOROLA SOLUTIONS, INC., a Delaware corporation authorized to do business in Florida
Plaintiff,

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

vs.

CIRCUIT CIVIL DIVISION

INTERNATIONAL RADIO LLC
Defendant(s),

CASE NO:

COMPLAINT FOR GOODS SOLD, ACCOUNT STATED AND OTHER DAMAGES

Plaintiff, MOTOROLA SOLUTIONS, INC., a Delaware corporation authorized to do business in Florida, sues Defendant, INTERNATIONAL RADIO LLC, and alleges:

JURISDICTIONAL AND FACTUAL ALLEGATIONS

1. This is an action for damages that exceeds \$50,000.00
2. At all times material hereto, Plaintiff sold and delivered goods to Defendant, INTERNATIONAL RADIO LLC, and Defendant failed to pay.

COUNT I - OPEN ACCOUNT

3. Plaintiff readopts and realleges the jurisdictional and factual allegations of this Complaint.
4. This Count is pursuant to F.R.C.P. Form 1.932 approved by the Florida Supreme Court.
5. Defendant, INTERNATIONAL RADIO LLC owes Plaintiff \$1,031,191.97 that is due with interest since July 1, 2025, according to the attached account.

WHEREFORE, Plaintiff demands judgment for damages against Defendant, INTERNATIONAL RADIO LLC, including court costs, interest and such other relief as this Court deems reasonable.

COUNT II - GOODS SOLD

6. Plaintiff readopts and realleges the jurisdictional and factual allegations of this Complaint.
7. This Count is pursuant to F.R.C.P. Form 1.935 approved by the Florida Supreme Court.
8. Defendant, INTERNATIONAL RADIO LLC, owes Plaintiff \$1,031,191.97 that is due with interest since July 1, 2025, for goods sold and delivered by Plaintiff to Defendant, INTERNATIONAL RADIO LLC, as evidenced by the invoices and/or statements attached hereto.

WHEREFORE, Plaintiff demands judgment for damages against Defendant, INTERNATIONAL RADIO LLC including court costs, interest and such other relief as this Court deems reasonable.

