IN THE CIRCUIT COURT FOR ESCAMBIA COUNTY, FLORIDA PROBATE DIVISION

IN RE: GUARDIANSHIP OF SARAH ELISABETH WURZBACH
Ward

FILE NO: 2008-GA-2297

DIVISION: T

EMERGENCY PETITION TO RATIFY TRADE-IN OF VEHICLE AND FOR GUARDIAN TO PROVIDE AUTOMOBILE INSURANCE

SARAH ELISABETH WURZBACH, by her counsel, states:

- 1. The Court authorized the Guardian on May 22, 2019, to remit up to \$55,000 for Sarah to purchase a newer vehicle and to trade in her existing vehicle. Sarah used those funds to purchase a 2019 Toyota Armada. The Guardian pays the automobile insurance on Sarah's vehicles.
- 2. The 2019 Toyota Armada was titled in the name of Sarah Wurzbach. There were no restrictions in the May 22, 2019 order that required Sarah to keep the 2019 Toyota Armada.
- 3. On May 21, 2021, Sarah Wurzbach traded in the 2019 Toyota Armada for a 2019 Titan Pro 4x XD 4-door Truck, which Sarah titled in her name and her husband's name. The Truck is being used as Sarah's main vehicle and to assist in pulling the horse trailer for her horse Foxy.
- 4. Sarah also added her sixteen (16) year-old son to the insurance policy, which resulted in an increase in the monthly premium of \$150. Sarah notified Progressive Insurance of the change in vehicles and the addition of her son as a driver.
- 5. Sarah was notified by the Guardian that the Guardian's attorney, Lois Lepp, advised the Guardian not to pay the automobile insurance. Sarah now has no insurance coverage on the Truck.

- 6. We note that the Guardian, Synovus Trust Company, N.A., is again continuing its pattern of arbitrarily and capriciously disputing this issue, and now Sarah is left without automobile insurance coverage.
- 7. Since there was no prohibition that Sarah must continue to own the 2019 Armada (which was only referred to as a "Vehicle") in the May 22, 2019 Order therefore we ask that the Court now ratify and approve the trade-in of the 2019 Armada for the 2019 Titan Truck and that the Guardian immediately pay the automobile insurance premium on this Truck and that the Guardian be ordered to continue to pay the automobile insurance premiums on this 2019 Titan Truck.

WHEREFORE petitioner makes this Emergency Petition.

I certify that a copy hereof was served on:

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by E-mail and E-Service on

, 2021

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