

**CITY OF NORTH PORT**  
**SARASOTA COUNTY, FLORIDA**  
4970 City Hall Boulevard North Port, FL 34286

**CODE ENFORCEMENT DIVISION**

CITY OF NORTH PORT, FLORIDA,

Petitioner,

v.

NGUYEN MINH  
6510 76<sup>TH</sup> AVENUE NORTH  
PINELLAS PARK, FL 33781

Respondent,

ADDRESS OF VIOLATION:  
5000 S. Chamberlain Boulevard  
North Port, FL 34286  
Parcel ID: 1006008624

Case No. CECASE-24-4292 and

ADDRESS OF VIOLATION:  
5200 S. Chamberlain Boulevard  
North Port, FL 34286  
Parcel ID: 1006008623

Case No. CECASE-24-4293

---

**MOTION TO CONSOLIDATE RELATED CODE ENFORCEMENT ACTIONS**

Respondent Nguyen Minh and Lincoln Capital Acquisition LLC, by and through their undersigned counsel, hereby move to consolidate Case No. CECASE-24-4292 and Case No. CECASE-24-4293, regarding adjacent parcels owned by Respondent Nguyen Minh, and in support state as follows:

1. The City of North Port issued two sets of Affidavits of Violation and Notices of Mandatory Hearing for May 22, 2025, regarding the above-referenced properties. Pursuant to the Contract for Purchase and Sale of Real Property dated September 8, 2023, between Nguyen

B. Minh (Owner/Seller) and Lincoln Capital Acquisition LLC (Buyer), Lincoln Capital Acquisition LLC has an equitable and legal interest in the subject properties as a contract purchaser under Florida law (collectively, the “Movants”).

2. Rule 1.270(a) of the Florida Rules of Civil Procedure provides that where actions involve a common issue of law or fact, consolidation is appropriate.

3. The City has initiated two cases (CE-24-4293 for Parcel ID 1006008623 and CE-24-4292 for Parcel ID 1006008624) before the Magistrate that appear to involve the same underlying violations of City Code. Both matters involve the same Respondent Owner, Nguyen B. Minh, and aggrieved party, Lincoln Capital Acquisition LLC. A singular ruling will efficiently ensure that both cases are treated consistently, so no inconsistencies arise from the resolution of the matters.

WHEREFORE, Respondent Nguyen Minh and Lincoln Capital Acquisition LLC respectfully request that the above-referenced code enforcement actions be consolidated.

Dated: May 21, 2025

Respectfully submitted,

/s/ Carl Roberts, Esq.

Carl G. "Jeff" Roberts, Esq.  
10764 70th Avenue, Unit 8107  
Seminole, FL 33772  
(727)381-9602  
SPN: 0199559/FBN: 844675  
Carlroberts9999@gmail.com  
Attorney for Respondent Nguyen B. Minh

/s/Darrin J. Quam

DARRIN J. QUAM, ESQUIRE  
Florida Bar No. 995551  
E-mail: [dquam@stearnsweaver.com](mailto:dquam@stearnsweaver.com)  
E-mail: [lwade@stearnsweaver.com](mailto:lwade@stearnsweaver.com)  
NICOLE NEUGEBAUER MACINNES, ESQUIRE

Florida Bar No. 1025043  
E-mail: [nmacinnes@stearnsweaver.com](mailto:nmacinnes@stearnsweaver.com)  
E-mail: [rjgarcia@stearnsweaver.com](mailto:rjgarcia@stearnsweaver.com)  
STEARNS WEAVER MILLER WEISSLER  
ALHADEFF & SITTERSON, P.A.  
401 E. Jackson Street, Suite 2100 (33602)  
Post Office Box 3299  
Tampa, Florida 33601  
Telephone: (813) 223-4800  
Attorneys for Lincoln Capital Acquisition, LLC