

STATE OF RHODE ISLAND
PROVIDENCE, SC

DISTRICT COURT
SIXTH DIVISION

ZJBV PROPERTIES, LLC

V.

Case No.: 6CA-2024-

BENEATH THE GARDEN, LLC,
& DAVID SILVA

COMPLAINT FOR EVICTION PURSUANT TO R.I.G.L. 34-18.1-9

1. Plaintiff, ZJBV Properties, LLC, is a New Hampshire limited liability company authorized to do business in Rhode Island.
2. Plaintiff is the owner/landlord of that certain commercial property located at 28 Market Street, Warren, Rhode Island (the "Property").
3. The Property consists of a commercial building ("Building") and a parking lot ("Parking Lot")
4. Defendants, Beneath the Garden, LLC and David Silva, entered into a Lease Agreement for the Property.
5. The Lease Agreement requires Defendants to pay \$14,500 per month to rent the Building and \$1,000 per month to rent the Parking Lot.
6. Defendants are in arrears in rental payments.
7. The rental amount in arrears is \$15,500 and Defendants remain in possession of the Property.

WHEREFORE, Plaintiff requests that this Court grant judgment for the Plaintiff against Defendants, Beneath the Garden, LLC and David Silva, jointly and severally, for the

following relief: (i) possession of the Property; (ii) back rent in the amount of \$15,500.00 and all other rent which is due and owing at the time of the hearing; (iii) late fee due under the Lease Agreement in the amount of \$1,550.00; (iv) payment of \$1,221.52 for Plaintiff's attorneys' fees and costs that Defendants agreed to pay in 6CA-2023-13533 for Plaintiff to dismiss that action; (v) real property taxes due under the Lease Agreement in the amount of \$3,687.13; (vi) payment of Plaintiff's reasonable attorney's fees and costs pursuant to the Lease Agreement and R.I.G.L. §9-1-45 for the prosecution of this action; and (vii) all other relief which the Court deems just and appropriate.

Plaintiff,
ZJBV Properties, LLC,
By its attorneys,

/s/ Carl S. Levin
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