

IN THE CIRCUIT COURT FOR THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

LOUIS JEAN BAPTISTE, CARDINAL
ANDREWS, and VALERIE HUNTER,
for the use and benefit of other property
owners within New World Condominium
Apartments Condominium Association, Inc.,

CASE NO. 2023-001716-CA-01

SECTION: CA-11

Plaintiffs,

v.

NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM
ASSOCIATION, INC.,

Defendant.

**RECEIVER’S SECOND REPORT AND APPLICATION FOR ORDER AUTHORIZING
PAYMENT OF FEES AND EXPENSES**

The Hon. David M. Gersten (Ret.), the court-appointed Receiver (the “Receiver”) in the above-captioned action, submits his second report regarding the above-referenced matter, along with his request for authorization of interim professional fees and expenses.

I. Summary of the Receiver’s Activities.

A. Employment of Professionals.

In addition to the Receiver’s professionals detailed in his preliminary report,¹ the Receiver has also hired an experienced real estate lawyer, Richard (“Rick”) Zelman, Esq., and his law firm,

¹ The Receiver previously engaged (i) his law firm, Gordon Rees Scully Mansukhani LLP, (ii) Damian | Valori | Culmo (“Lead Counsel”) as his lead counsel, (iii) an experienced community association attorney, Jesmany Jomarrón, Esq., and the law firm, The Morgan Law Group, P.A. regarding a specific issue related to the condominium documents and condominium related matters, (iv) HSM Consulting, Inc. to conduct an independent forensic fire investigation, (v) a fencing company to construct a safety barrier around certain units following consultation and

Sacher Zelman Hartman, P.A., to assist in title related matters concerning the partition action filed by the Receiver in the case styled *Gersten v. Higgs, et al.*, Case No. 2023-015785-CA-01 (Fla. 11th Cir. Ct. 2023).

The foregoing professionals have been instrumental to the Receiver's success in this case thus far, helping him to secure the Association's assets and evaluate the value of the Condominium Property and the Association's rights and obligations, investigating and pursuing claims of the Association, defending claims against the Association, operating the Association on an interim basis, allowing certain unit owners to temporarily access the Condominium Property to retrieve their personal belongings, determining the estimated and/or potential value of the Receivership Estate (including matters impacted by the value of the Condominium Property), communicating with the unit owners/tenant of the Association, adjusters, creditors, and others with interest in the Condominium Property, and providing such persons with necessary information regarding the subject receivership.

B. Efforts Obtaining Financial Records and Securing Assets.

The Receiver undertook to have all Association funds transferred to Lead Counsel's fiduciary account from the bank at which the Association had an account when the Order Appointing Receiver was entered. The Receiver attaches a current financial accounting report as of July 31, 2023, as **Exhibit A** (Standard Fund Accounting Report). Also, the Receiver plans to move the Court to approve another loan certificate in the amount of \$500,000.00 for demolition of

approval by the Building Official for the City of Miami Gardens, (vi) Vanguard Construction Group to conduct an estimate of potential costs to repair the Condominium Property, and (vii) AppraisalFirst Real Estate Appraisers, LLC to conduct an appraisal of the value of the Condominium Property as vacant land to be developed as permitted under the current zoning code.

the structurally damaged building on the Condominium Property and for the payment of certain creditors of the Association, and some fees of professionals.

C. Taking Over the Association's Business Operations.

Pursuant to the Order Appointing Receiver, the Receiver investigated the business operations, management duties, and responsibilities of the Association, and began the collection of maintenance fees and special assessments, the handling of payments to contractors or other creditors, maintenance of the Association, day-to-day functions of the Association (such as security, fencing, debris removal, compliance with governmental orders, and garbage removal), and relations with unit owners and residents, among other things.

The Receiver and his professionals continue to maintain unit owner and resident relations by updating the receivership website (<https://newworldcondoreceivership.com/>), and communicating with unit owners and residents and other interested parties via e-mail (newworldreceivership@gmail.com) and the direct phone line for the receivership (786-854-7523). Since the Receiver's preliminary report was filed, the Receiver, through Lead Counsel, has posted updated move-out schedules for unit owners and residents, notified the unit owners and other interested parties of the partition action referenced *supra*, and introduced the unit owners to real estate counsel, Richard ("Rick") Zelman, Esq., referenced, *supra*, among other things. The Receiver's Lead Counsel also continues to field dozens of calls and emails from residents and unit owners each week answering questions or providing requested information or both.

The Receiver has held nine Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer questions. The last meeting referenced in the

Receiver's preliminary report was held on March 27, 2023.² Thereafter, Zoom Meetings were held on April 12, 2023, May 3, 2023, June 1, 2023, and July 12, 2023. Another meeting is scheduled for August 22, 2023.

D. Retrieval of Belongings.

As set forth in the Receiver's preliminary report, the Building Official for the City of Miami Gardens authorized certain unit owners to retrieve their personal belongings from certain units. Since then, all authorized unit owners who scheduled appointments successfully retrieved their personal belongings from their units. The Receiver, through Lead Counsel, emailed the unit owners and residents which were not authorized to retrieve their personal belongings due to life/safety concerns (Unit #s 214, 215, 216, 217, 218/219, 220/221, 222/223, 224/225, 226/227, 228/229, 230, 231, 232, 233, 234, 235, and 236) photographs of the condition of their units, providing background information as to why access was prohibited. All residents and unit owners with vehicles who made appointments retrieved their vehicles from the property.

E. Written Notice Required for Repairs.

As referenced in the Receiver's preliminary report, the Receiver and Lead Counsel informed the unit owners on March 6, 2023 and March 27, 2023 that section 12.8(b)(ii) of the Declaration of Condominium (Book 17301, Page 1661) required termination of the Association if 70% of the unit owners do not provide written notice of their choice to repair the Condominium Property. The Receiver and Lead Counsel, however, did *not* receive written notice to repair the Condominium Property from 70% of unit owners, but instead received only two out of seventy-

² As detailed in the Receiver's preliminary report, during the March 27, 2023 Zoom Meeting, the Receiver and Lead Counsel discussed section 12.8 of the Declaration of Condominium (requiring termination of the Association if 70% of the unit owners do not provide written notice of their choice to repair the Condominium Property), and, thereafter, the Receiver and Lead Counsel did *not* receive written notice to repair the Condominium Property from 70% of the unit owners.

five written notices indicating a choice to repair the Condominium Property. Thereafter, the Receiver, through Lead Counsel, filed a case to partition the Condominium Property and for declaratory judgment as to section 12.8 of the Declaration of Condominium as referenced *infra*. The partition action is discussed further *infra*.

F. Legal Proceedings Filed Against, *Inter Alia*, the Association.³

i. Whitfield Class Action.

As referenced in the Receiver’s preliminary report, one of the unit owner’s tenants, Shekita Whitfield, filed a class action lawsuit against the Association and its former property management company and former board members. *See Whitfield, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Whitfield Class Action”). The Receiver’s Lead Counsel moved to transfer the Whitfield Class Action to Division 11. The day before the hearing on such motion, counsel for the Plaintiff amended the complaint to, *inter alia*, drop the Association as a party in that lawsuit. Thus, the Class Action is no longer pending against the Association, and the motion to transfer was denied. Such litigation may diminish the potentially available assets of the Receivership Estate if the plaintiff in that case successfully recovers from the Association’s former property management company, which has a wasting policy with a \$2 million limit.

ii. Thomas Class Action.

On July 11, 2023, certain tenants of certain unit owners filed a lawsuit against the Association and its former property management company. *See Thomas, et al. v. Prestige*

³ The following cases were filed against the Association in violation of the stay provision set forth in the Order Appointing Receiver, which states: “A stay is hereby imposed, prohibiting all persons and entities from commencing [] any litigation against . . .the ASSOCIATION without prior approval of this Court.” Order Appointing Receiver, at ¶ A.

Management Solutions, Inc., et al., Case No. 2023-019490-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Thomas Class Action”). Service of process has not been effectuated upon the Association.

iii. The Valtom Action.

On April 11, 2023, one of the unit owners, Valtom, LLC, filed a lawsuit against the Association and its former property management company and former board members. *See Valtom, LLC v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012984-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Valtom Action”). Valtom, LLC voluntarily dismissed its action without prejudice. *See* Notice of Voluntary Dismissal, attached as **Exhibit B**.

iv. The Forty Year Investment Action.

On March 31, 2023, one of the unit owners, Forty Year Investment, LLC, filed a lawsuit against the Association, and its former property management company and former board members. *See Forty Year Investment, LLC, v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012973-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Forty Year Investment Action”). Forty Year Investment, LLC’s counsel indicated to Lead Counsel that a voluntary dismissal will be filed.

v. The Deutsche Bank Action.

On July 27, 2023, Deutsche Bank National Trust Company filed a complaint for foreclosure against, *inter alia*, a unit owner and the Association. *See Deutsche Bank National Trust Co. v. King, et al.*, Case No. 2023-020443-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Deutsche Bank Action”). Service of process has not yet been effectuated upon the Association.

vi. Mechanic’s Lien.

On July 7, 2023, the roofing companies which were working on the Association’s roof at the time of the January 28, 2023 fire, DJ’s Consulting Group, LLC and Elite Innovation Construction, Inc., filed a mechanic’s lien against the Association. *See* Miami-Dade County

Official Records, at Book 33784, Pages 1200-1201. The Receiver, through Lead Counsel, sent the roofers a demand to remove the mechanic's lien because it was untimely and otherwise deficient. *See* Demand Letter to Roofers, attached as **Exhibit C**.

G. Legal Proceedings Brought by the Receiver.

i. The Partition Action.

On April 24, 2023, the Receiver, through Lead Counsel, filed a complaint for partition and declaratory judgment against the unit owners and other interested parties (*i.e.* lenders and mortgagees) in the case styled *Gersten v. Higgs, et al.*, Case No. 2023-015785-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Partition Action"). In this case, the Receiver seeks a partition of the Condominium Property, as well as a judicial determination that the Association is terminated pursuant to section 12.8 of the Declaration of Condominium because 70% or more of the unit owners did not agree in writing to repair the Condominium Property within 60 days of the January 28, 2023 fire, *i.e.* by March 29, 2023.

Following the filing of the Complaint in that case, the Receiver, through Lead Counsel, moved to transfer that case to this Court's division, and the case was transferred successfully. Since such time, the Receiver moved the Court for an extension of time to effectuate service of process upon the more than 100 respondents in that case (most of which have already been served or signed a waiver of service). This case will hopefully result in the Condominium Property being converted into a fee simple estate, and then sold. The funds from such sale will then be distributed in accordance with the Order Appointing Receiver and further orders of the Court.

ii. The Prestige Action.

On July 11, 2023, the Receiver, through Lead Counsel, sued the Association's former property management company, Prestige Management Solutions, Inc., for gross negligence,

common law breach of fiduciary duty, and statutory breach of fiduciary duty in the case styled *Gersten v. Prestige Management Solutions, Inc.*, Case No. 2023-019453-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Prestige Action”). The Receiver, through Lead Counsel, agreed to defendant’s counsel’s request for an extension of time to respond to the complaint.

II. Plan for Moving Forward.

The Receiver and Lead Counsel will continue to take appropriate measures pursuant to the Declaration of Condominium and under Florida law to convert the Condominium Property into a fee simple estate, and then sell the land pursuant to a separate process approved by this Court. The Receiver will also continue to pursue claims and investigate other claims which the Association may pursue, as well as defend the Association as set forth in the Order Appointing Receiver. The Receiver and his team will continue to communicate with the unit owners, residents, creditors, and other interested parties to inform them of any updates to their units and the status of this receivership, as well as answer any general or specific questions they may have.

III. Conclusion.

The Receiver appreciates the opportunity to assist the Court in this matter. While significant efforts have already yielded progress, the Receiver will continue his efforts as discussed herein to fulfill his duties under the Court’s Order Appointing Receiver, with the focus on affording the most beneficial and cost-effective solution as to the above-referenced matters.

RECEIVER’S APPLICATION FOR ORDER AUTHORIZING PAYMENT OF FEES AND EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE FUNDS PURSUANT TO THE APPOINTING RECEIVER

As detailed in the Receiver’s preliminary report, and second report, *supra*, to assist in carrying out his duties, and as authorized by the Order Appointing Receiver, the Receiver retained (i) his law firm, Gordon Rees Scully Mansukhani LLP (“GRSM”), (ii) Damian | Valori | Culmo as

lead counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association (“Lead Counsel”), and (iii) an experienced real estate lawyer, Richard (“Rick”) Zelman, Esq., through his law firm, Sacher Zelman Hartman, P.A., to assist in title related matters concerning the Partition Action (“Special Counsel”).

The fees and costs incurred by GRSM and Lead Counsel are reflected on the invoices attached hereto as **Composite Exhibit 1**, which reflect the time entries and work performed by the Receiver and Lead Counsel for the benefit of the Association from April 1, 2023 through June 30, 2023,⁴ as well as the Receiver’s reductions thereto. The fees and costs incurred by Special Counsel are reflected on the invoices attached hereto as **Composite Exhibit 2**, and reflect the time entries and work performed by Special Counsel for the benefit of the Association from May 2, 2023 through July 31, 2023, as well as the Receiver’s reductions thereto.

As reflected in **Composite Exhibit 1**, from April 1, 2023 to June 30, 2023, GRSM incurred fees in the total amount of \$23,995.00 and costs in the amount of \$0.00, and Lead Counsel incurred fees in the amount of \$107,531.00 and costs in the amount of \$7,444.90. As reflected in **Composite Exhibit 2**, from May 2, 2023 to July 31, 2023, Special Counsel incurred fees in the amount of \$11,907.00, and costs in the amount of \$2,500.00.⁵

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees and costs of Special Counsel in the total amount of \$14,407.00. GRSM and Lead Counsel seek approval of their fees and costs from April 1, 2023 through June 30, 2023, but agree to defer payment of such fees until a later time when the Association is better able to pay such fees and

⁴ GRSM and Lead Counsel’s invoices for June 30, 2023 through July 31, 2023 will be submitted with the Receiver’s third report.

⁵ The foregoing professionals have reduced their regular rates for this matter and have provided additional reductions and discounts. In addition, the Receiver has utilized lower rate professionals whenever possible.

costs, or will seek payment from the sale of the property. A proposed order is attached hereto as **Exhibit 3.**

CERTIFICATION

The Honorable David M. Gersten (Retired), Receiver, hereby certifies that:

- (a) I have read this application (the “Application”);
- (b) To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the exhibits hereto and such fees as reduced by the Receiver are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- (d) I have not included in the amount for which reimbursement is sought the authorization of the cost of any investment, equipment or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for bulk mailing, photocopies and facsimile transmission);
- (e) In seeking reimbursement for a service which GRSM, Lead Counsel, and Special Counsel justifiably purchased or contracted for from a third party (including but not limited to copying, imaging, bulk mail, messenger service, overnight courier, or computerized research), I request reimbursement only for the amount billed to GRSM, Lead Counsel, and Special Counsel, as applicable, by the third-party vendor and paid by GRSM, Lead Counsel, and Special Counsel, as applicable, to such vendor. To the extent that such services were performed by me as Receiver, GRSM, Lead Counsel, and/or Special Counsel, I certify that I, GRSM, Lead Counsel, and/or Special Counsel, as applicable, am/is not making a profit on such reimbursable service.

s/ David M. Gersten

THE HON. DAVID M. GERSTEN (RET.)
COURT-APPOINTED RECEIVER

WHEREFORE, the Honorable David M. Gersten (Retired), as court-appointed Receiver, respectfully requests the Court grant the relief requested herein, and such further relief as the Court deems just and proper.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI LLP
1000 SE 2nd Street, Suite 3900
Miami, Florida 33131
Telephone: (305) 428-5300
Facsimile: (877) 634-7245
Primary Email: ethompson@grsm.com
Secondary Email: mbperez@grsm.com

By: *s/ Eric R. Thompson*

Eric R. Thompson
Florida Bar No. 888931

DAMIAN | VALORI | CULMO
1000 Brickell Avenue, Suite 1020
Miami, Florida 33131
Telephone: (305) 371-3960
Facsimile: (305) 371-3965
Primary Email: mdamian@dvlip.com
Primary Email: pvalori@dvlip.com
Primary Email: mlevine@dvlip.com
Secondary Email: rsaetae@dvlip.com

By: *s/ Melanie E. Damian*

Melanie E. Damian
Florida Bar No. 99392
Peter F. Valori
Florida Bar No. 004351
Morgan J. Levine
Florida Bar No. 1017222

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Florida Court's e-Filing Portal upon all counsel of record on this 15th day of August, 2023.

By: s/Melanie E. Damian
Melanie E. Damian, Esq.

Exhibit A

David Gersten, Esq., as Receiver
1000 Brickell Avenue, Suite 1020
Miami, Florida 33131

STANDARDIZED FUND ACCOUNTING REPORT

Fund for Louis Jean Baptiste et al. v. New World Condo Apartments Condominium Assn Inc.

Reporting Period 2/7/2022 to 8/10/2023

		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 2/7/2023):	\$ -	\$ -	
	Increases in Fund Balance:			
Line 2	Business Income	\$ -	\$ -	\$ -
Line 3	Cash and Deposits [1]	\$ 473,472.82	\$ 473,472.82	\$ 473,472.82
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 81.98	\$ 81.98	\$ 81.98
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available			\$ 473,554.80
	(Lines 1-8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 437,703.71	\$ 437,703.71	\$ 437,703.71
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 437,703.71
Line 11	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Expenses:	\$ -	\$ -	\$ -
Line 12	Disbursements to Court/Other	\$ -	\$ -	\$ -
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -	\$ -	\$ -
Line 12b	Federal Tax Payments	\$ -	\$ -	\$ -
	Total Disbursements to Court/Other			
	Total Funds Disbursed (Lines 9-11)			\$ 437,703.71
Line 13	Ending Balance (As of August 10, 2023)			\$ 35,851.09
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 35,851.09

[1] Funds were received and disbursed to administer the Receivership Estate and its assets. See Receipts and Expenses in Attachment 1 hereto.

**Attachment 1 to Exhibit A to Receiver's Report
New World Condo Association - Receipts of Fiduciary Account**

Date of Check	From	Amount
2/22/2023	Maintenance Fees	\$ 4,148.56
2/28/2023	Maintenance Fees	\$ 2,024.67
3/1/2023	Maintenance Fees	\$ 538.26
3/3/2023	Maintenance Fees	\$ 1,250.57
3/7/2023	Maintenance Fees	\$ 711.11
3/8/2023	Maintenance Fees	\$ 1,765.45
3/13/2023	Maintenance Fees	\$ 2,518.03
3/14/2023	Maintenance Fees	\$ 1,973.53
3/14/2023	Truist	\$ 8,125.00
3/1/2023	Maintenance Fees	\$ 1,108.78
3/21/2023	Maintenance Fees	\$ 4,370.82
3/31/2023	Maintenance Fees	\$ 2,773.06
4/6/2023	Maintenance Fees	\$ 1,920.26
4/6/2023	Loan	\$ 400,000.00
4/7/2023	Maintenance Fees	\$ 397.77
4/12/2023	Maintenance Fees	\$ 4,468.88
4/14/2023	Maintenance Fees	\$ 684.34
4/19/2023	Maintenance Fees	\$ 1,205.16
4/20/2023	Maintenance Fees	\$ 895.61
4/21/2023	Maintenance Fees	\$ 940.02
4/28/2023	Maintenance Fees	\$ 1,504.91
5/2/2023	Maintenance Fees	\$ 3,029.14
5/4/2023	Maintenance Fees	\$ 1,166.14
5/19/2023	Maintenance Fees	\$ 4,551.61
5/22/2023	Maintenance Fees	\$ 582.47
5/30/2023	Maintenance Fees	\$ 582.47
6/1/2023	Maintenance Fees	\$ 397.77
6/9/2023	Maintenance Fees	\$ 2,601.41
6/13/2023	Maintenance Fees	\$ 2,881.35
6/21/2023	Maintenance Fees	\$ 1,024.35
6/27/2023	Maintenance Fees	\$ 269.13
6/28/2023	Maintenance Fees	\$ 626.68
7/6/2023	Maintenance Fees	\$ 3,003.97
7/10/2023	Maintenance Fees	\$ 1,606.31
7/14/2023	Maintenance Fees	\$ 313.24
7/24/2023	Maintenance Fees	\$ 2,420.90
7/27/2023	Maintenance Fees	\$ 1,337.79
8/1/2023	Maintenance Fees	\$ 269.13
8/8/2023	Maintenance Fees	\$ 2,901.70
8/10/2023	Maintenance Fees	\$ 582.47
		\$ 473,472.82

City National Bank Interest

Date	Explanation	Amount
2/28/2023	interest	\$ 0.01
3/31/2023	interest	\$ 0.42
4/30/2023	interest	\$ 45.62
5/31/2023	interest	\$ 25.13
6/30/2023	interest	\$ 8.03
7/31/2023	interest	\$ 2.77
Total		\$ 81.98

GRAND TOTAL OF RECEIPTS \$ 473,554.80

**Attachment 1 to Exhibit A to Receiver's Report
New World Condo Association - Expenses of Fiduciary Account**

Date of Check	From	Amount
2/27/2023	Returned Check	\$ 313.34
2/27/2023	Bank Fee (returned check)	\$ 12.00
3/6/2023	Panissa Security (security)	\$ 5,000.00
3/6/2023	John's Garage Door (repair automatic gate)	\$ 299.60
3/6/2023	Waste Connection (dumpster and removal)	\$ 2,422.24
3/7/2023	HSM Consulting, Inc. (private fire investigator)	\$ 1,800.00
3/14/2023	Panissa Security (security)	\$ 2,909.94
3/14/2023	AppraisalFirst Real Estate Appraisers (land appraisal)	\$ 3,000.00
3/27/2023	Panissa Security (security)	\$ 3,000.00
3/31/2023	T-mobile (receivership phone)	\$ 20.00
4/5/2023	Lenders Legal Fees for Closing Loan (loan)	\$ 3,500.00
4/5/2023	Closing Costs for Loan (loan)	\$ 8,000.00
4/6/2023	Panissa Security (security)	\$ 2,000.00
4/6/2023	Demolition Gods (debris clean up)	\$ 6,500.00
4/6/2023	Bank Fee (wire transfer)	\$ 15.00
4/6/2023	Bank Fee (wire transfer)	\$ 15.00
4/7/2023	Stonemark Inc. (insurance)	\$ 12,598.42
4/7/2023	Bank Fee (ACH payment)	\$ 10.00
4/7/2023	HSM Consulting, Inc. (private fire investigator)	\$ 6,558.82
4/7/2023	Morandi Engineering and Construction	\$ 2,995.00
4/7/2023	Waste Connection (dumpster and removal)	\$ 209.68
4/7/2023	Waste Connection (dumpster and removal)	\$ 576.77
4/7/2023	Panissa Security (security)	\$ 2,909.94
4/7/2023	Panissa Security (security)	\$ 7,909.94
4/7/2023	Quality Fence and Gates, Corp. (safety fence)	\$ 4,800.00
4/7/2023	Stonemark Inc. (insurance)	\$ 12,009.21
4/11/2023	Demolition Gods (debris clean up)	\$ 6,500.00
4/11/2023	Bank Fee (wire transfer)	\$ 15.00
4/11/2023	Avante-NEA Insurance Group, Inc. (insurance)	\$ 4,756.26
4/17/2023	Stonemark Inc. (insurance)	\$ 1,428.57
4/17/2023	Stonemark Inc. (insurance)	\$ 10.00
4/18/2023	Panissa Security (security)	\$ 3,954.72
4/18/2023	Panissa Security (security)	\$ 3,954.72
4/19/2023	Demolition Gods (debris clean up)	\$ 13,000.00
4/19/2023	Bank Fee (wire transfer)	\$ 15.00
4/21/2023	Stonemark Inc. (insurance)	\$ 11,984.21
4/21/2023	Bank Fee (ACH payment)	\$ 10.00
5/1/2023	Damian Valori Culmo (legal fees)	\$ 137,794.21
5/1/2023	Gordon Rees Scully Mansukhabi LLP (legal fees)	\$ 32,860.00
5/1/2023	Bank Fee (wire transfer)	\$ 15.00
5/1/2023	The Morgan Law Group (legal fees)	\$ 9,020.00

5/1/2023	Stonemark Inc. (insurance)	\$ 1,346.26
5/1/2023	Stonemark Inc. (insurance)	\$ 10.00
5/1/2023	T-mobile (receivership phone)	\$ 20.00
5/3/2023	Maverick Security Services LLC (security)	\$ 1,810.44
5/18/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
5/18/2023	Bank Fee (wire transfer)	\$ 15.00
5/18/2023	Stonemark Inc. (insurance)	\$ 11,984.21
5/18/2023	Stonemark Inc. (insurance)	\$ 10.00
5/19/2023	Panissa Security (security)	\$ 3,954.72
5/19/2023	Maverick Security Services LLC (security)	\$ 8,448.72
5/24/2023	DVS Technologies (receivership website)	\$ 433.35
5/24/2023	DVS Technologies (receivership website)	\$ 379.85
5/24/2023	The Madison Insurance Group (insurance)	\$ 716.00
5/2/2023	The Madison Insurance Group (insurance)	\$ 2.95
5/31/2023	T-mobile (receivership phone)	\$ 20.00
6/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
6/1/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/13/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/13/2023	Stonemark Inc. (insurance)	\$ 11,984.21
6/13/2023	Stonemark Inc. (insurance)	\$ 10.00
6/2/2023	The Madison Insurance Group (insurance)	\$ 4,180.05
6/21/2023	The Madison Insurance Group (insurance)	\$ 2.95
6/27/2023	Waste Connection (dumpster and removal)	\$ 1,013.33
6/27/2023	The Madison Insurance Group (insurance)	\$ 1,995.00
6/27/2023	The Madison Insurance Group (insurance)	\$ 2.95
6/27/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/30/2023	T-mobile (receivership phone)	\$ 20.00
7/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
7/11/2023	Maverick Security Services LLC (security)	\$ 8,649.88
7/14/2023	Action Junk Removal Services (junk removal)	\$ 450.00
7/24/2023	Waste Connection (dumpster and removal)	\$ 77.65
7/25/2023	Vanguard Construction (estimate of repairs)	\$ 10,000.00
7/25/2023	Maverick Security Services LLC (security)	\$ 8,448.72
7/31/2023	T-mobile (receivership phone)	\$ 20.00
8/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
8/8/2023	Maverick Security Services LLC (security)	\$ 8,448.72
GRAND TOTAL OF EXPENSES		\$ 437,703.71

Exhibit B

IN THE CIRCUIT COURT FOR THE 11TH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

VALTOM, LLC, a Florida Corporation,
Plaintiff,

CASE NO.: 2023-012984-CA-01

v.

PRESTIGE MANAGEMENT SOLUTIONS, INC., a
Florida corporation; NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM ASSOCIATION, a
Florida corporation; HERBERT TOUZALIN, an individual;
EMMA WILLIAMS, an individual; JAMES
SIMPSON, an individual; BETTY SCOTT, an individual; and
KAROL POLLARD, an individual,
Defendants.

NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

To: **Clerk of the Court**

Plaintiff, VALTOM, LLC, by and through its undersigned counsel, pursuant to Florida Rule of Civil Procedure 1.420, hereby voluntarily dismisses the above-styled cause without prejudice with all parties bearing their own attorney's fees and costs.

PRIETO LAW GROUP, PLLC
Attorneys for Plaintiff
101 N.E. 3rd Ave., Ste. 1500
Fort Lauderdale, FL 33301
(954) 332-3648 - Office

By: s/ Carlos A. Prieto
Carlos A. Prieto, Esq. for the firm
Fla. Bar No.: 114450
cprieto@prietolawgroup.com
For Service of Court Documents Only:
pleadings@prietolawgroup.com

DANIEL WAGNER, P.A.
Co-Counsel/Attorneys for Plaintiff
20807 Biscayne Blvd., Suite 201
Aventura, FL 33180
Tel: (305) 919-7788
Email: Daniel@danielwagnerlaw.com

BY: /s/ Daniel Wagner
DANIEL WAGNER, ESQ.
F.B.N 29788

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the Florida Courts e-Filing Portal sent via email transmission to all parties of record this 23rd day of May 2023.

By: s/ Carlos A. Prieto
Carlos A. Prieto, Esq. for the firm
Fla. Bar No.: 114450
101 N.E. 3rd Ave., Ste. 1500
Fort Lauderdale, FL 33301
(954) 332-3648 - Office

Exhibit C DVC

DAMIAN | VALORI | CULMO

August 7, 2023

Via Email and First Class Mail

Mr. Elrod Phillips and Mr. Herby Myrthyl
2400 NW 98 Street
Miami, Florida 33147

Re: Demand for Removal of Mechanic's Lien filed in the official records of Miami-Dade County at Book 33784, pgs. 1200-1201.

Dear Messrs. Phillips and Myrthyl:

We represent the Honorable David M. Gersten (Ret.) as receiver of New World Condominium Apartments Condominium Association, Inc. (the "Association"), and write regarding the above-referenced mechanics lien which you and/or your companies, DJ's Consulting Group, LLC and/Elite Innovation Construction, Inc., filed on July 7, 2023. See Mechanic's Lien, attached as **Exhibit A**.

Florida law requires that a mechanic's lien be asserted within ninety (90) days of the date upon which work which was last performed. Here, work was last performed at the latest on January 28, 2023. See e.g., Mr. Myrthyl's own statements to the Miami-Dade County Fire Department that work was last performed for at the property on January 27, 2023. See Redacted Excerpt of the Miami-Dade Fire Department's Fire Inspection Report, attached as **Exhibit B**. As such, the ninety (90) day deadline to file a mechanic's lien against the Association expired on or about April 28, 2023 (i.e. months prior to the filing of the subject July 7, 2023 lien). For the foregoing reason, the lien is defective and is a "fraudulent lien" under Florida law.

The mechanic's lien is also defective because it is based upon a notice of commencement that is a forged instrument. See Notice of Commencement, attached as **Exhibit C**. Indeed, the verification pursuant to section 92.525, Florida Statutes does *not* reflect the signature of the property manager, Denise Brooks, but instead reflects her name written in Mr. Myrthyl's handwriting. The lien is, therefore, defective and is a "fraudulent lien" under Florida law, for this reason as well.

There are numerous other defects in the lien as to the property described and other matters as well. And, this letter is not a complete statement of the Association's rights.

For the foregoing reasons, DEMAND IS HEREBY MADE upon you to file a release of the mechanic's lien within 7 days. PLEASE GOVERN YOURSELVES ACCORDINGLY.

DVCATTORNEYS.COM

1000 BRICKELL AVENUE, SUITE 1020 | MIAMI, FL 33131

P: 305.371.3960 | F: 305.371.3965

DVC

DAMIAN | VALORI | CULMO

Sincerely,

Peter F. Valori

Peter F. Valori, Esq.
Morgan J. Levine, Esq.

DVCATTORNEYS.COM

1000 BRICKELL AVENUE, SUITE 1020 | MIAMI, FL 33131

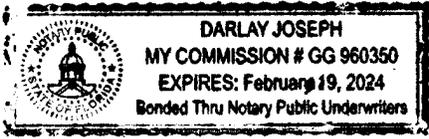
P: 305.371.3960 | F: 305.371.3965

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE) ss.

The Affiant, Elrod Phillips owner of ELITE INNOVATION CONSTRUCTION being duly sworn, on oath deposes and says that s/he is the Claimant and that s/he has read the foregoing claim for the lien and knows the contents thereof, and that all statements therein contained are true and correct to the best of his/her belief and knowledge.

Subscribed and sworn to before me on July 7, 2023



[Handwritten Signature]

(Notary Printed Name)

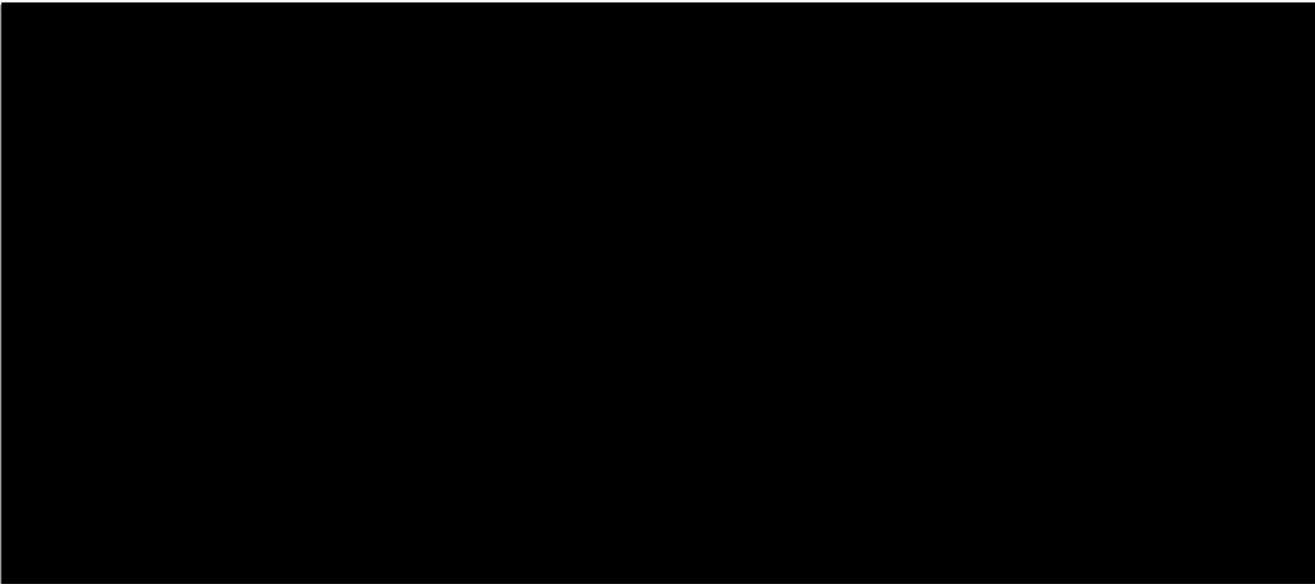
My commission expires on: _____



INCIDENT NARRATIVE

31 WITNESS INTERVIEWS AND VIDEO FOOTAGE:

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44 Herby Myrtil (Owner of DJTH Roofing)
45 DOB: 01FEB72
46 DL: M634320720410
47 12030 NW 21 Ct, N Miami, FL 33167
48 Cell: 786-277-2525
49

CERTIFIED COPY
OF THE ORIGINAL DOCUMENT ON FILE WITH
MIAMI-DADE COUNTY
FIRE RESCUE DEPARTMENT
9300 N.W. 41 STREET
DORAL, FLORIDA
[Signature] 01/28/23

- 50 • He had been doing roof work on 395 NW 177 St for more than a month.
- 51 • He had come to the scene to pick up supplies for a job in Ft. Lauderdale.
- 52 • He was not doing roof work at the property today.
- 53 • They last worked on the roof yesterday, 27JAN23.
- 54 • They worked on the west side of the building.
- 55 • They were not using hot tar or using torches.
- 56 • They were installing pans around air conditioner openings.
- 57 • They had not worked in the vicinity of the fire origin approximately two weeks ago.
- 58 • He dropped his brother off in the east parking lot to gather the needed supplies, and he continued on to get
- 59 gas at a nearby gas station.
- 60 • He and his brother were talking on the phone, and his brother told him that there was smoke coming from
- 61 the eaves near the northeast corner of the building.
- 62 • He turned around and drove into the east parking lot.
- 63 • He saw smoke coming from the eaves above apartment 217.
- 64 • There was also smoke coming from the open entry door of apartment 217.
- 65 • He took a fire extinguisher from a cabinet on the first floor and took it up the stairs to apartment 217.
- 66 • The fire was venting through the top north corner of the window located on the south side of the open entry
- 67 door of apartment 217.
- 68 • There was heavy smoke coming from the open entry door of apartment 217.
- 69 • He discharged the fire extinguisher through the door into apartment 217.
- 70 • The fire extinguisher didn't make any difference.





INCIDENT NARRATIVE

71 • He called the Property Manager and left the scene.

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CERTIFIED TRUE COPY
OF THE ORIGINAL DOCUMENT ON FILE WITH
MIAMI-DADE COUNTY
FIRE RESCUE DEPARTMENT
9300 N.W. 41 STREET
DORAL, FLORIDA 33178-2414
DATE 02/28/23



NOTICE OF COMMENCEMENT

A RECORDED COPY MUST BE POSTED ON THE JOB SITE AT TIME OF FIRST INSPECTION

CFN 2022R0836322
OR Bk 33449 Pg 1314 1 Pgs
RECORDED 11/02/2022 11:11:31
HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA

PERMIT NO. 2022-001489 TAX FOLIO NO. _____

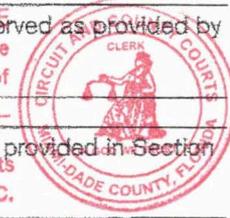
STATE OF FLORIDA:
COUNTY OF MIAMI-DADE:

THE UNDERSIGNED hereby gives notice that improvements will be made to certain real property, and in accordance with Chapter 713, Florida Statutes, the following information is provided in this Notice of Commencement.

Space above reserved for use of recording

- 1. Legal description of property and street/address: 395 NW 177 St Miami Gardens Florida 33169
- 2. Description of improvement: RR ROOFING Shingle and Flat.
- 3. Owner(s) name and address: NEW WOOD CONDOMINIUM 395 NW 177 St Miami
Interest in property: _____
Name and address of fee simple titleholder: _____
- 4. Contractor's name, address and phone number: ELITE INNOVATION Construction
2400 NW 98 St, Mia FL 33147 Tel=305 527 8303
- 5. Surety: (Payment bond required by owner from contractor, if any)
Name, address and phone number: _____
Amount of bond \$ _____
- 6. Lender's name and address: _____
- 7. Persons within the State of Florida designated by Owner upon whom notices of other documents may be served as provided by Section 713.13(1)(a)7., Florida Statutes,
Name, address and phone number: _____
- 8. In addition to himself, Owners designates the following person(s) to receive a copy of the Lender's Notice as provided in Section 713.13(1)(b), Florida Statutes.
Name, address and phone number: _____
- 9. Expiration date of this Notice of Commencement: _____
(the expiration date is 1 year from the date of recording unless a different date is specified)

STATE OF FLORIDA - COUNTY OF MIAMI-DADE
I HEREBY CERTIFY that this is a true copy of the original filed in this office on NOV 02 2022 day of NOV, AD 2022
to receive a copy of the Lender's Notice as provided in Section 713.13(1)(b), Florida Statutes.
By HARVEY RUVIN, Clerk of Circuit and County Courts
D.C.



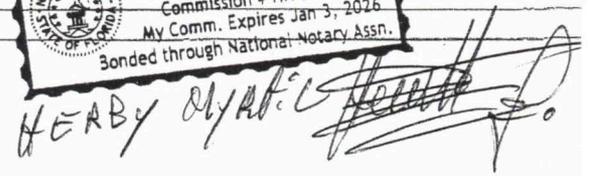
WARNING TO OWNER: ANY PAYMENTS MADE BY THE OWNER AFTER THE EXPIRATION OF THE NOTICE OF COMMENCEMENT ARE CONSIDERED IMPROPER PAYMENTS UNDER CHAPTER 713, PART I, SECTION 713.13, FLORIDA STATUTES, AND CAN RESULT IN YOUR PAYING TWICE FOR IMPROVEMENTS TO YOUR PROPERTY. A NOTICE OF COMMENCEMENT MUST BE RECORDED AND POSTED ON THE JOB SITE BEFORE THE FIRST INSPECTION. IF YOU INTEND TO OBTAIN FINANCING, CONSULT WITH YOUR LENDER OR AN ATTORNEY BEFORE COMMENCING WORK OR RECORDING YOUR NOTICE OF COMMENCEMENT.

Signature(s) of Owner(s) or Owner(s)' Authorized Officer/Director/Partner/Manager
Prepared By DENISE BROOKS Prepared By DENISE BROOKS
Print Name DENISE BROOKS Print Name DENISE BROOKS
Title/Office _____ Title/Office _____

STATE OF FLORIDA
COUNTY OF MIAMI-DADE
The foregoing instrument was acknowledged before me this 02 day of NOVEMBER, 2022
By DENISE BROOKS

Individually, or as _____ for _____
 Personally known, or produced the following type of identification: _____
Signature of Notary Public: _____
Print Name: _____
(SEAL)

HERBY MYRTLE
Notary Public - State of Florida
Commission # HH 213172
My Comm. Expires Jan 3, 2026
Bonded through National Notary Assn.



VERIFICATION PURSUANT TO SECTION 92.525, FLORIDA STATUTES
Under penalties of perjury, I declare that I have read the foregoing and that the facts stated in it are true, to the best of my knowledge and belief.

Signature(s) of Owner(s) or Owner(s)'s Authorized Officer/Director/Partner/Manager who signed above:
By DENISE BROOKS By _____

DVVC

DAMIAN | VALORI | CULMO
1000 BRICKELL AVENUE, SUITE 1020
MIAMI, FLORIDA 33131

Mr. Elrod Phillips and Mr. Herby Myrthy
2400 NW 98 Street
Miami, Florida 33147



quodient
FIRST-CLASS MAIL
IMI
\$000.87⁰
08/07/2023 ZIP 33131
044K33206933

US POSTAGE

Composite Exhibit 1

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®
1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Carlos Lopez c/o David M. Gersten
100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

May 17, 2023
ID: GERSP 1299620
Invoice No. 21326723
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2023

Fees For Professional Services:	\$15,955.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$15,955.00

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
04/02/23	Review and respond to Peter Valori email re: debris removal .1; and review and respond to Peter Valori email re: draft report for court and review and edit the report .7	DMG2	0.80
04/03/23	Review Kalif Fagan email and send to Melanie Damian re: offer .1; review and respond to Melanie Damian email re: funding agreement .1; and review Kalif Fagan email re: offer .1	DMG2	0.30
04/03/23	Continue drafting analysis of Association's insurance policies (finish drafting Section I - Pertinent Policy Provisions, pp. 1-10; begin to draft Section II - Potential Covered Claims, pp. 11-14)	ERT	3.80
04/04/23	Review email exchange(s) between Kalif Fagan and Melanie Damian re: purchase .1; and review email exchanges between Eric Thompson and Melanie Damian re: insurance policy .1	DMG2	0.20
04/04/23	Continue drafting analysis of Association's insurance policies (continue drafting Section II - Potential Covered Claims, pp. 11-14)	ERT	1.60
04/05/23	Review Eric Thompson email with analysis .3; and review and respond to Peter Valori email re: signing document .1	DMG2	0.40
04/05/23	Begin to analyze and revise Receiver's Preliminary Report (drafted by independent counsel, Peter Valori, Esq.) (as requested by D. Gersten)	ERT	2.40
04/05/23	Finish drafting analysis of Association's insurance policies (finish drafting Section II - Potential Covered Claims, pp. 11-14)	ERT	3.20
04/06/23	Conference with Melanie Damian re: authorizations to remove debris .1; review and respond to Peter Valori email re: demo gods payment .1; review and respond to Peter Valori email re: Ozzie and debris removal .1; review and respond to Mary Dhanji email re: payment .1; review and edit latest draft of report for court .3; review and respond to Eric Thompson email re: final approval .1; and review and respond to Peter Valori email re: insurance .1	DMG2	0.90
04/06/23	Email correspondence with independent counsel (Melanie Damian, Esq.) regarding: 1) inclusion of fee application in Receiver's Preliminary Report; and 2) attachment to said Report, including review attached Standardized Fund Accounting Report	ERT	0.40
04/06/23	Further revise Receiver's Preliminary Report (drafted by independent	ERT	0.40

	counsel, Peter Valori, Esq.) to incorporate information from Standardized Fund Accounting Report provided this afternoon by independent counsel (Melanie Damian, Esq.)		
04/06/23	Email correspondence with independent counsel (Melanie Damian, Esq. and Peter Valori, Esq.) regarding and attaching our revised Receiver's Preliminary Report (for their review and comments)	ERT	0.10
04/06/23	Finish analyzing and revising Receiver's Preliminary Report (drafted by independent counsel, Peter Valori, Esq.) (as requested by D. Gersten)	ERT	1.90
04/07/23	Review and respond to Melanie Damian email re: approval of payments .1	DMG2	0.10
04/10/23	Legal team email(s) re: today's legal team meeting .1; and conduct zoom legal team meeting .8	DMG2	0.90
04/10/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Peter Valori, Esq., Melanie Damian, Esq. and Morgan Levine) to discuss strategy moving forward (Ms. Damian attended a portion of the meeting)	ERT	0.80
04/12/23	Conference with Eric Thompson re: insurance .2; review and respond to Peter Valori and Eric Thompson email re: insurance .1; and zoom conference with homeowners 1.2	DMG2	1.50
04/12/23	Telephone conference with D. Gersten regarding strategy going forward, including as to review of property manager's insurance policy (for assessment of potential covered claims against property manager)	ERT	0.20
04/12/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss action items and strategy going forward	ERT	1.20
04/13/23	Conference with Melanie Damian re: demolition	DMG2	0.20
04/14/23	Reviewed respond to Peter Valori email re: Markel Insurance	DMG2	0.10
04/18/23	Review and respond to Peter Valori email re: insurance .1; and review and respond to Peter Valori email re: insurance .1; and review and forward email form Danial Wagner re: lawsuits .1	DMG2	0.30
04/19/23	Review and respond to Peter Valori email re: debris removal and retrieval of property in units .1; review and respond to Peter Valori email re: no access units .1; review and respond to Peter Valori email re: approval of posting .1; review and respond to Peter Valori email re: foreclosure issue .1; review and respond to Peter Valori email re: new	DMG2	0.90

	lawsuits filed and review lawsuits .3; review and respond to Peter Valori email re: phone call with plaintiff attorneys .1; and review and respond to Peter Valori email re: bankruptcy court re: stay .1;		
04/19/23	Draft summary of Professional Liability Errors & Omissions Insurance and Commercial General Liability policies issued to Prestige Management Solutions Inc., including analysis of potential covered claims, 3 pages	ERT	1.80
04/19/23	Analyze Professional Liability Errors & Omissions Insurance Policy issued to Prestige Management Solutions Inc., 30 pages, in furtherance of evaluating potential covered claims against Prestige	ERT	0.60
04/19/23	Analyze Commercial General Liability Policy issued to Prestige Management Solutions Inc., 49 pages, in furtherance of evaluating potential covered claims against Prestige	ERT	0.60
04/19/23	Analyze the 8/1/16 Condominium Management Agreement between New World Condominium Apartment Condominium Association, Inc. and Prestige Management Solutions, Inc., 4 pages, in furtherance of drafting summary of Professional Liability Errors & Omissions Insurance and Commercial General Liability policies issued to Prestige Management Solutions Inc.	ERT	0.10
04/20/23	Review and respond to Peter Valori email re: complaint	DMG2	0.10
04/21/23	Conference with Melanie Damian, Peter Valori and Erica Thompson re: insurance issues and complaints .8; review draft complaint for partition .4; and review Jade Winds case .3	DMG2	1.50
04/21/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Peter Valori, Esq. and Melanie Damian, Esq.) to discuss: 1) strategy going forward, including as to potential claims by/against the Association covered by insurance; and 2) draft partition Complaint prepared by Mr. Valori (D. Gersten and Ms. Damian attended a portion of the meeting)	ERT	1.30
04/21/23	Analyze draft Complaint for Partition and Declaratory Judgment (drafted by independent counsel, Peter Valori, Esq.), 10 pages	ERT	0.40
04/22/23	Review and respond to Eric Thompson email re: complaint and edits re: same .1; and review and respond to Melanie Damian email with redlines edits to complaint .2	DMG2	0.30
04/23/23	Review and respond to Peter Valori email re: complaint .1	DMG2	0.10
04/24/23	Review Eric Thompson/Peter Valori email re: coverage .2; review and	DMG2	0.60

respond to Peter Valori email re: posting .1; review and respond to Peter Valori email re: revised complaint .1; and review and respond to multiple Peter Valori and Melanie Damian emails re: threats .2

04/24/23	Detailed email correspondence with independent counsel (Peter Valori, Esq.) regarding further analysis of potential covered claims under insurance policies issued to Prestige Management Solutions Inc., including in light of my review of the opinion in Jade Winds Ass'n v. FirstService Residential Fla., Inc. (S.D. Fla. 2019)	ERT	0.60
04/24/23	Analyze Jade Winds Ass'n v. FirstService Residential Fla., Inc. (S.D. Fla. 2019), 8 pages, forwarded by independent counsel (Peter Valori, Esq.), in furtherance of continued analysis of potential covered claims under insurance policies issued to Prestige Management Solutions Inc.	ERT	0.30
04/27/23	Review and approve security agreement .1; and review and respond to Mary Dhanji email re: security contract .1	DMG2	0.20
04/28/23	Review and respond to Peter Valori email re: partition case .1; review and respond to Reesa Setae re: owner meeting .1; review and respond to Peter Valori email re: several issues ie: funding, demolition and posting on website .1	DMG2	0.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	9.70	7,275.00
ERT	Eric Thompson	Partner	400.00	21.70	8,680.00

TOTAL FOR SERVICES	\$15,955.00
---------------------------	--------------------

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®
1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Carlos Lopez c/o David M. Gersten
100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

May 17, 2023
ID: GERSP 1299620
Invoice No. 21326723
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2023

Fees For Professional Services:	\$15,955.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$15,955.00

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
ABA Number (ACH): 121042882
Federal Tax ID: 94-1617026

Domestic and International fund transfer process:
ABA Number (Wires): 121000248
Swift code: Domestic – 121000248
International – WFBIUS6S
Reference: 21326723

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®
1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Carlos Lopez c/o David M. Gersten
100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

June 29, 2023
ID: GERSP 1299620
Invoice No. 21354168
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH May 31, 2023

Fees For Professional Services:	\$3,145.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,145.00

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/01/23	Review and respond to multiple case deadline inquiries .2	DMG2	0.20
05/02/23	Review and respond to. Peter Valori email re: bill .1; review and respond to Morgan Levine re: transfer .1; and review and respond to Peter Valori email re: partition law case .2	DMG2	0.40
05/03/23	Zoom conference with legal team and unit owners 1.0	DMG2	1.00
05/03/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss issues going forward	ERT	1.30
05/04/23	Review Richard Zelman engagement letter .1	DMG2	0.10
05/09/23	Review and respond to Peter Valori email re: city official communication .1	DMG2	0.10
05/10/23	Review and respond to Peter Valori email re: update .1	DMG2	0.10
05/11/23	Review game plan re: partition re: insurable title emailed by Peter Valori .1	DMG2	0.10
05/12/23	Review and respond to Jeanette Sears email re: designations in appeal	DMG2	0.20
05/15/23	Review and respond to Reese Setae re: meeting	DMG2	0.10
05/16/23	Review and respond Rick Zelman memo re: title insurance issues .2	DMG2	0.20
05/17/23	Conference with real estate counsel re: procedure re: title insurance .5	DMG2	0.50
05/19/23	Review and respond to Rick Zelman email re: title commitment	DMG2	0.10
05/20/23	Review and respond to Melanie Damian email re: Damian/Valori billing .1; and review Damian/Valori billing .1	DMG2	0.20
05/22/23	Review and responded to Reesa Setae emails re: meeting .1	DMG2	0.10
05/24/23	Review and respond to Peter Valori email re: pick up possessions .1	DMG2	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	3.50	2,625.00
ERT	Eric Thompson	Partner	400.00	1.30	520.00

TOTAL FOR SERVICES **\$3,145.00**

Outstanding Statements as of June 29, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Total Accounts Receivable Balance:		\$15,955.00

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®
1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Carlos Lopez c/o David M. Gersten
100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

June 29, 2023
ID: GERSP 1299620
Invoice No. 21354168
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH May 31, 2023

Fees For Professional Services:	\$3,145.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,145.00

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
ABA Number (ACH): 121042882
Federal Tax ID: 94-1617026

Domestic and International fund transfer process:
ABA Number (Wires): 121000248
Swift code: Domestic – 121000248
International – WFBIUS6S
Reference: 21354168

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Miami, FL 33131
dgersten@grsm.com

July 31, 2023
ID: GERSP 1299620
Invoice No. 21374087
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH June 30, 2023

Fees For Professional Services:	\$4,895.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,895.00

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/01/23	Attend zoom meeting with unit owners .9	DMG2	0.90
06/01/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss issues going forward	ERT	0.80
06/10/23	Review and respond to Rick Zelman email re: title commitment .1; email from prospective offeror and forward to Peter Valori .1	DMG2	0.20
06/12/23	Review and respond to Peter Valori email re: lawsuit	DMG2	0.10
06/14/23	Review and edit proposed motion to dismiss re: class action suit .2	DMG2	0.20
06/16/23	Review email from Mary Dhanji re: insurance policy re: renewal .1; review Rick Zelman email with title commitment and review title commitment (note: 25 pages with many issues) 1.7	DMG2	1.80
06/20/23	Conference with Rick Zelman re: title commitment and issues relating to the commitment .3; review insurance policy to be issued and sign same to assure insurance coverage .3; review and respond to Peter Valori email(s) re: title commitment issues .1	DMG2	0.70
06/22/23	Review and respond to Mary Dhanji email re: wind insurance .1; review and respond to Mary Dhanji email re: insurance coverage .1	DMG2	0.20
06/23/23	Conference with Rick Zelman and Peter Valori re: title commitment .9	DMG2	0.90
06/24/23	Review and respond to emails from Melanie Damian and Peter Valori re: insurance .1	DMG2	0.10
06/27/23	Review series of emails between insurance carrier and Peter Valori .1; conference with Melanie Damian and Peter Valori re: status us multiple matters including lawsuits, insurance and demolition .5	DMG2	0.60
06/28/23	Review and respond to Nicole Banfi email re: information .1; review Peter Valori email to Nicole Banfi re: receivership .1	DMG2	0.20
06/29/23	Review and respond to Peter Valori email re: people contacting owners .1	DMG2	0.10
06/30/23	Review and respond to Peter Valori email re: laundry equipment .1	DMG2	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	6.10	4,575.00
ERT	Eric Thompson	Partner	400.00	0.80	320.00

TOTAL FOR SERVICES **\$4,895.00**

Outstanding Statements as of July 31, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Total Accounts Receivable Balance:		\$19,100.00

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100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

July 31, 2023
ID: GERSP 1299620
Invoice No. 21374087
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH June 30, 2023

Fees For Professional Services:	\$4,895.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,895.00

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
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ABA Number (Wires): 121000248
Swift code: Domestic – 121000248
International – WFBIUS6S
Reference: 21374087

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To:
 Louis Jean Baptiste et al. v. New World Condo Apartments
 Condominium Assn Inc. - Receivership

Invoice

Invoice Date: 6/30/2023
 Invoice No: 23262
 Due Date: Due Upon Receipt

Matter: MME1676

Memo: MME1676 Louis Jean Baptiste et al. v. New World Condo Apartments
 Condominium Assn Inc. - Receivership, Louis Jean Baptiste et al. v. New
 World Condo Apartments Condominium Assn Inc. - Receivership

Professional Fees

Date	Description	Staff	Rate	Hours	Amount
04/01/2023	Review email regarding unit 110 deed regarding partition action.	PFV	\$550.00	0.10	\$55.00
04/01/2023	Review Morgan law and estimator invoices.	PFV	\$550.00	0.10	\$55.00
04/01/2023	Draft status email and request for invoices to receiver.	PFV	\$550.00	0.10	\$55.00
04/01/2023	Review email to D. Brooks regarding request for documents.	PFV	\$550.00	0.10	\$55.00
04/01/2023	Review debris removal quotes and draft status email.	PFV	\$550.00	0.20	\$110.00
04/02/2023	Email communications with D. Brooks regarding requested documents concerning the business of the association.	MJL	\$350.00	0.20	\$70.00
04/02/2023	Email regarding debris removal contract.	PFV	\$550.00	0.20	\$110.00
04/03/2023	Work on complaint for partition with focus facts regarding the Association being placed into a receivership.	MJL	\$350.00	0.80	\$280.00
04/03/2023	Reviewing and revising loan documents and closing loan (1.3); responding to tenant (.3); telephone call with potential purchaser (.2).	MME	\$550.00	1.80	\$990.00
04/03/2023	Email with project manager regarding debris removal contract.	PFV	\$550.00	0.20	\$110.00
04/03/2023	Email regarding general liability insurance regarding property.	PFV	\$550.00	0.20	\$110.00
04/03/2023	Review UCC-1 and draft email regarding same.	PFV	\$550.00	0.20	\$110.00
04/03/2023	Work on partition complaint.	PFV	\$550.00	0.70	\$385.00
04/03/2023	Review email regarding purchase inquiry.	PFV	\$550.00	0.20	\$110.00

04/04/2023	Work on complaint for partition with focus on receiver tasks completed in the receivership case (0.9); same with focus on financial status of Association (1.2); same with focus on exhibits to be attached to the complaint (0.4); email communications with D. Brooks regarding unpaid insurance premium (0.1); analyze whether to compel D. Brooks to produce requested documents (0.1).	MJL	\$350.00	2.70	\$945.00
04/04/2023	Responding to potential buyer (.3); insurance payment issues (.3).	MME	\$550.00	0.60	\$330.00
04/04/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	3.00	\$360.00
04/04/2023	Email regarding unit owner and team meetings.	PFV	\$550.00	0.10	\$55.00
04/04/2023	Email regarding payment of insurance premium.	PFV	\$550.00	0.10	\$55.00
04/04/2023	Conference with City of Miami Gardens regarding status and planning.	PFV	\$550.00	0.30	\$165.00
04/04/2023	Continue search of lis pendens and releases for each unit (2.0); review court file for affidavit of service on association in class action suit (.1).	rs	\$100.00	2.10	\$210.00
04/05/2023	Managing resident access and recovery of possessions on property and removing vehicles from property.	og	\$120.00	6.00	\$720.00
04/05/2023	Email regarding debris removal contract.	PFV	\$550.00	0.10	\$55.00
04/05/2023	Email regarding waste removal contract.	PFV	\$550.00	0.10	\$55.00
04/05/2023	Email with fire investigation expert.	PFV	\$550.00	0.30	\$165.00
04/05/2023	Reviewing and approving invoices (.3); working on fund transfer and confirming closing (.3); discuss status and strategy with P. Valori (.4).	MME	\$550.00	1.00	\$550.00
04/05/2023	Continue search of lis pendens and releases for each unit (2.0); email to and from receiver's office regarding upcoming owners' meeting and legal team meeting (.2); email to D. Bissell regarding upcoming owners' meeting and website (.1).	rs	\$100.00	2.30	\$230.00
04/06/2023	Managing resident access and recovery of possession on property.	og	\$120.00	6.50	\$780.00
04/06/2023	Reviewing invoices and email to Receiver for approval.	MME	\$550.00	0.30	\$165.00
04/06/2023	Telephone call with D. Brooks regarding requested documents to be delivered to O. Garcia (0.2); work on Receiver's Preliminary Report with focus on Receiver's revisions as to cost of debris removal (0.1); same with focus on revisions concerning the March 27, 2023 informational meeting and the vote to repair, which took place after initial report was sent to Receiver for review (0.9); same with focus on differentiating between "Condominium Property" and "Association" to provide uniformity between same and partition complaint (0.4).	MJL	\$350.00	1.60	\$560.00
04/06/2023	Emails with P. Valori regarding the Association's having funds necessary to bind the insurance policy (.1); review proposal from insurance broker approved by Receiver, and send email to broker requesting invoice for premium and binding of the policy (.2); emails with P. Valori regarding providing update to Receiver regarding same and send email to Receiver regarding status of binding the policy (.1).	KDM	\$550.00	0.40	\$220.00

04/06/2023	Review executed Demolition Gods agreement.	PFV	\$550.00	0.10	\$55.00
04/06/2023	Draft email regarding initial payment of debris removal contract.	PFV	\$550.00	0.10	\$55.00
04/06/2023	Email with Project Manager regarding Building Official coordination.	PFV	\$550.00	0.10	\$55.00
04/06/2023	Email with receiver regarding status.	PFV	\$550.00	0.10	\$55.00
04/06/2023	Work on fee application back up documentation preparation.	PFV	\$550.00	0.80	\$440.00
04/06/2023	Review email regarding signed dumpster contract.	PFV	\$550.00	0.20	\$110.00
04/06/2023	Review insurance declarations regarding premium payments.	PFV	\$550.00	0.20	\$110.00
04/06/2023	Draft email regarding payment for general liability umbrella, and crime policies.	PFV	\$550.00	0.10	\$55.00
04/06/2023	Email regarding liability insurance.	PFV	\$550.00	0.20	\$110.00
04/06/2023	Continue search of lis pendens and releases for each unit (1.5); mass email to unit owners regarding upcoming owners' meeting (.2).	rs	\$100.00	1.70	\$170.00
04/07/2023	Managing resident access and recovery of possession on property.	og	\$120.00	2.70	\$324.00
04/07/2023	Further emails with team members regarding payment of premium for insurance policy and binding the policy and follow up with insurance broker regarding same (.2); review invoice from insurance broker for insurance policy, discuss with team members, and coordinate payment of same (.1).	KDM	\$550.00	0.30	\$165.00
04/07/2023	Email regarding replacement project manager.	PFV	\$550.00	0.20	\$110.00
04/07/2023	(No charge) Email to and from D. Bissell regarding change of owners' meeting (.1); mass email to unit owners regarding rescheduled owners' meeting (.2).	rs		0.30	\$0.00
04/10/2023	(Reduced time) Managing resident access and recovery of possessions on property and walk through with Demolition Gods team and Miami-Dade building official.	og	\$120.00	6.50	\$780.00
04/10/2023	Meeting with Receiver and E. Thompson regarding insurance and potential litigation (0.8); analyze condominium documents to determine whether indemnification provisions are contained therein (0.2); email communications with Receiver regarding same (0.1); email communications with D. Brooks regarding her insurance policy (0.1); analyze property management company's insurance policy to determine how to recover under same (0.4).	MJL	\$350.00	1.60	\$560.00
04/10/2023	Emails regarding certificate and status of Petition for Partition (.4); attending portion of meeting with Receiver (.2).	MME	\$550.00	0.60	\$330.00
04/10/2023	Emails with insurance broker regarding binding the insurance policy, the final Application for the policy, and the Receiver's execution of same, emails with Receiver and broker regarding execution, review executed copy, review invoice for premium, coordinate payment, and follow up on same and binding of policy (.2).	KDM	\$550.00	0.20	\$110.00
04/10/2023	Review insurance analysis memoranda.	PFV	\$550.00	0.20	\$110.00

04/10/2023	Conference with receiver and team regarding status and planning as to dissolution, debris removal, status report, insurance, class action matters, and insurance analysis.	PFV	\$550.00	0.80	\$440.00
04/10/2023	Review indemnification provisions of declaration of condominium.	PFV	\$550.00	0.20	\$110.00
04/10/2023	Call regarding status of debris removal company.	PFV	\$550.00	0.20	\$110.00
04/10/2023	Complete search of lis pendens and releases for each unit (2.0); draft exhibit of owners and named persons for right of survivorship for partition (1.5); email to P. Valori regarding same and status of drafting exhibits to partition suit complaint (.2).	rs	\$100.00	3.70	\$370.00
04/11/2023	(Reduced time) Work on coordination and oversight of clean up crew Demolition Gods.	og	\$120.00	6.50	\$780.00
04/11/2023	Email communications D. Heimberger regarding posting condominium documents on receivership website (0.1); work on fee application (0.8).	MJL	\$350.00	0.90	\$315.00
04/11/2023	Discuss with P. Valori insurance issues related to the property and scope and coverages under recently bound policy (.2).	KDM	\$550.00	0.20	\$110.00
04/11/2023	Conference with fire investigator.	PFV	\$550.00	0.30	\$165.00
04/11/2023	Conference with Building Official.	PFV	\$550.00	0.20	\$110.00
04/11/2023	Conference with project manager regarding railings.	PFV	\$550.00	0.20	\$110.00
04/11/2023	Email with adjuster for roofing company.	PFV	\$550.00	0.30	\$165.00
04/11/2023	Review email regarding request for condominium documents from unit owner.	PFV	\$550.00	0.10	\$55.00
04/11/2023	Draft email regarding same and request to post condominium documents on website.	PFV	\$550.00	0.10	\$55.00
04/11/2023	Response to unit owner questions regarding maintenance payments, special assessments, and liens.	PFV	\$550.00	0.30	\$165.00
04/11/2023	Email regarding windstorm policy and response to demand to re-roof property.	PFV	\$550.00	0.30	\$165.00
04/11/2023	Preliminary review of Prestige liability policy.	PFV	\$550.00	0.20	\$110.00
04/12/2023	Continue working with the Demolition God team regarding clean up and safety.	og	\$120.00	4.50	\$540.00
04/12/2023	(No charge) Conduct search on line on various Secretary of State web sites to gather lender primary addresses and registered agent addresses for unit owners with open mortgage or liens for partition suit.	js		2.90	\$0.00

04/12/2023	Communications with O. Garcia to determine whether Prestige Property Management provided documents responsive to the Receiver's February 2023 letter in preparation of communications with Receiver regarding same (0.1); email communications with Receiver regarding same (0.1); email communications with Receiver regarding tonight's zoom meeting with unit owners (0.1); analyze invoices from Receiver's office in preparation of working on fee application (0.1); same for invoices from Lead Counsel in preparation of same (0.3); same for invoices from Special Counsel in preparation of same (0.2); work on fee application with focus on amount of fees and costs to be paid to the Receiver's office, Lead Counsel, and Special Counsel (0.8); same with focus on Receiver's Certification to be included therein (0.4); work on proposed order granting same to be submitted with same (0.4); work on Receiver's preliminary report with focus on revisions concerning written notice of unit owners (0.6); attend meeting with unit owners via Zoom (1.3);	MJL	\$350.00	4.40	\$1,540.00
04/12/2023	Email from insurance broker providing confirmation of insurance for policy to cover Receiver and professionals, review same, and send email to Receiver and P. Valori forwarding same with update regarding status of obtaining policy.	KDM	\$550.00	0.20	\$110.00
04/12/2023	Reviewing and revising draft report.	MME	\$550.00	0.80	\$440.00
04/12/2023	Draft email regarding receipt and bate labelling documents of the association.	PFV	\$550.00	0.20	\$110.00
04/12/2023	Email regarding title searches as to mortgage holders.	PFV	\$550.00	0.10	\$55.00
04/12/2023	Review email from Mr. Borda regarding proposal for purchase and draft response.	PFV	\$550.00	0.20	\$110.00
04/12/2023	Review and revise status report and fee application.	PFV	\$550.00	0.50	\$275.00
04/12/2023	Prepare for and attend Zoom status conference with in unit owners.	PFV	\$550.00	1.20	\$660.00
04/12/2023	Email to J. Serna regarding mortgagor's and lien holders on units (.2); draft spreadsheet of mortgagor's and lien holders (.4); begin online search for principal mailing addresses and registered agent information for unit owners with open mortgages or liens for partition suit complaint (.3); compile exhibits, finalize and file receiver's preliminary report and fee application (1.0).	rs	\$100.00	1.90	\$190.00
04/13/2023	Continue working with the Demolition God team regarding clean up and safety matters.	og	\$120.00	4.50	\$540.00
04/13/2023	Work on schedule for second round of unit owners to retrieve belongings (0.3); work on partition complaint with focus on allegations regarding lienholders (0.2).	MJL	\$350.00	0.50	\$175.00
04/13/2023	Further emails with Receiver regarding the binding of the policy to cover Receiver and professionals.	KDM	\$550.00	0.10	\$55.00
04/13/2023	Telephone call with Receiver regarding status of demolition and next steps.	MME	\$550.00	0.30	\$165.00
04/13/2023	Revise and research memorandum regarding special magistrate provisions under Florida partition law.	JS	\$150.00	1.50	\$225.00

04/13/2023	Team meeting regarding Prestige document production (.2); phase 2 owner access (.2); and partition action mortgagee information (.2).	PFV	\$550.00	0.60	\$330.00
04/13/2023	Work on partition complaint regarding mortgagee information.	PFV	\$550.00	0.10	\$55.00
04/13/2023	Call with building official regarding debris removal and owner move out.	PFV	\$550.00	0.30	\$165.00
04/13/2023	Call with O. Garcia regarding status and planning regarding debris removal and access of phase 2 group access.	PFV	\$550.00	0.40	\$220.00
04/13/2023	(No charge) Email to D. Bissel regarding receiver's preliminary report and fee application and website (.1); meeting with P. Valori, M. Levine and O. Garcia regarding production of documents from Prestige, phase II access for unit owners and strategy for partition suit (.5); email to and from various copy services regarding documents produced by prestige (.2); email to P. Valori regarding same (.1); continue online search for principal mailing addresses and registered agent information for unit owners with open mortgages or liens for partition suit complaint (.3).	rs		1.20	\$0.00
04/14/2023	Continue working with the Demolition God team regarding clean up and safety matters.	og	\$120.00	8.50	\$1,020.00
04/14/2023	Emails regarding security and approving bills.	MME	\$550.00	0.30	\$165.00
04/14/2023	Work on partition complaint with focus on allegations related to lien holders.	MJL	\$350.00	0.30	\$105.00
04/14/2023	Complete online search for principal mailing addresses and registered agent information for unit owners with open mortgages or liens for partition suit complaint (.3); draft exhibit of mortgagors and lien holders to partition complaint (.3); email to P. Valori and M. Levine regarding same (.1); draft and revise phase II schedule for retrieval of personal possessions (.3); email to P. Valori and M. Levine regarding bates labeling production of documents from Prestige (.2).	rs	\$100.00	1.20	\$120.00
04/15/2023	Continue working with the Demolition God team regarding clean up and safety.	og	\$120.00	6.30	\$756.00
04/17/2023	Email communications with Receiver regarding vehicle which was removed from condominium property belonging to H. Green (0.2); analysis of O. Garcia's affidavit as to same (0.2); work on schedule for next round of unit owners to retrieve their personal items from units with focus on communications from unit owners regarding preferred dates (0.4).	MJL	\$350.00	0.80	\$280.00
04/17/2023	(Reduced time) Continue working with the Demolition God team regarding clean up and safety matters.	og	\$120.00	4.80	\$576.00
04/17/2023	Work with debris removal team on clean up and safety matters.	dj	\$120.00	6.00	\$720.00
04/17/2023	Call with project manager regarding status and move out planning.	PFV	\$550.00	0.30	\$165.00
04/17/2023	Work on partition complaint.	PFV	\$550.00	0.40	\$220.00

04/17/2023	Email and call regarding attempted unauthorized access to vehicle.	PFV	\$550.00	0.30	\$165.00
04/17/2023	Email with investigator regarding Mercedes.	PFV	\$550.00	0.20	\$110.00
04/17/2023	Email regarding Toyota vehicle.	PFV	\$550.00	0.20	\$110.00
04/17/2023	Call with project manager regarding vehicle removal protocol and review email regarding same.	PFV	\$550.00	0.30	\$165.00
04/17/2023	Prepare detailed memorandum regarding Toyota Corolla and Mercedes left on site factual background regarding same.	PFV	\$550.00	0.40	\$220.00
04/17/2023	Revise exhibit of owners and named persons for right of survivorship and exhibit of mortgagors and lien holders to partition complaint (.5); revise phase II schedule for retrieval of personal possessions (.2).	rs	\$100.00	0.70	\$70.00
04/18/2023	Reviewing security proposal and responding (.2); reviewing debris removal e-mails and schedule and responses (.3).	MME	\$550.00	0.50	\$275.00
04/18/2023	(Reduced time) Continue working with the Demolition God team regarding clean up and safety matters.	og	\$120.00	6.50	\$780.00
04/18/2023	(Reduce time) Continue working on debris removal regarding clean up and safety matters.	dj	\$120.00	6.50	\$780.00
04/18/2023	Analyze updated case law regarding statutory requirements for partition action in preparation of working on partition complaint (1.2); work on complaint for partition and declaratory action with focus on exhibit as to unit owners based upon foregoing statutory requirements (0.9); investigation into place of business for lien holders set forth in Exhibit C to be attached to complaint in preparation of updating style of case to reflect same (1.2).	MJL	\$350.00	3.30	\$1,155.00
04/18/2023	Work on partition and declaratory judgment complaint.	PFV	\$550.00	1.10	\$605.00
04/18/2023	Conference with project manager regarding debris removal and second floor inspection by Building Official.	PFV	\$550.00	0.20	\$110.00
04/18/2023	Email regarding Mercedes automobile on property and contact with owner.	PFV	\$550.00	0.30	\$165.00
04/18/2023	Email regarding review and verification of debris removal company.	PFV	\$550.00	0.30	\$165.00
04/18/2023	Email regarding debris removal company payment request.	PFV	\$550.00	0.20	\$110.00
04/18/2023	Email with Building Official regarding request for access.	PFV	\$550.00	0.20	\$110.00
04/18/2023	Review clerk's website regarding new lawsuits filed against the association.	PFV	\$550.00	0.40	\$220.00
04/18/2023	Call with counsel for Plaintiffs in forty year and Valtum class action cases filed against the Association.	PFV	\$550.00	0.60	\$330.00
04/18/2023	Draft status report to receiver regarding new cases, notice to insurance companies, partition action third party liability complaints.	PFV	\$550.00	0.40	\$220.00
04/18/2023	Conference with M. Damian regarding status and planning.	PFV	\$550.00	0.20	\$110.00

04/18/2023	Revise draft partition complaint (.3); revise phase II schedule for retrieval of personal possessions in accordance with requests from owners (.2).	rs	\$100.00	0.50	\$50.00
04/19/2023	Email communications with Receiver regarding update as to Phase II of retrieving personal belongings (0.2); work on complaint for partition and declaratory judgment with focus on updating style of case to reflect lienholders (0.3); email communications with Receiver regarding copycat lawsuit (0.2); telephone call with E. Connor regarding conversation with property manager (0.2).	MJL	\$350.00	0.90	\$315.00
04/19/2023	Walk through with debris removal team and prepare safety for residence.	dj	\$120.00	8.00	\$960.00
04/19/2023	(No charge) Walk through with building inspector and prepare safety measures for residents.	og		8.00	\$0.00
04/19/2023	Email with Building Official regarding clearing of units in back of property for access.	PFV	\$550.00	0.20	\$110.00
04/19/2023	Conduct post debris removal walk through contractor and Building Official as well as punch list run down with project manager and contractor.	PFV	\$550.00	1.00	\$550.00
04/19/2023	Conference regarding visitation schedule modification and second floor documentation and access.	PFV	\$550.00	0.50	\$275.00
04/19/2023	Work on case planning regarding partition action.	PFV	\$550.00	0.40	\$220.00
04/19/2023	Call with project manager regarding second floor unit access.	PFV	\$550.00	0.20	\$110.00
04/19/2023	Prepare status report for Receiver regarding debris removal and access and related issues.	PFV	\$550.00	0.40	\$220.00
04/19/2023	Prepare draft second floor unit owner access information.	PFV	\$550.00	0.40	\$220.00
04/19/2023	Email with Judge regarding potential impact of bankruptcy of unit owner on partition action.	PFV	\$550.00	0.30	\$165.00
04/19/2023	Revise phase II schedule for retrieval of personal possessions in accordance with requests from owners (.2); email to D. Bissel regarding phase II schedule, notice to second floor owners and website (.1).	rs	\$100.00	0.30	\$30.00
04/20/2023	Continue working with the Demolition God team regarding clean up and safety matters.	og	\$120.00	8.00	\$960.00
04/20/2023	Work with debris removal team on clean up.	dj	\$120.00	2.00	\$240.00
04/20/2023	Review email regarding fee award and draft response.	PFV	\$550.00	0.20	\$110.00
04/21/2023	(Reduced time) Continue working with the Demolition God team regarding clean up and safety.	og	\$120.00	7.50	\$900.00
04/21/2023	Reviewing and revising Partition Complaint (.7); attending legal team meeting (.4).	MME	\$550.00	1.10	\$605.00
04/21/2023	Zoom conference with co-counsel and receiver regarding insurance analysis and claims analysis and planning.	PFV	\$550.00	1.40	\$770.00
04/21/2023	Analyze potential claims as to Property management company and review case law regarding claims against property management companies.	PFV	\$550.00	1.00	\$550.00
04/22/2023	Work on Partition complaint.	PFV	\$550.00	0.30	\$165.00
04/22/2023	Draft email regarding summons preparation and waiver of service form.	PFV	\$550.00	0.20	\$110.00

04/22/2023	Review email regarding unit 115 move our reschedule.	PFV	\$550.00	0.10	\$55.00
04/22/2023	Continue review of insurance analysis regarding potential claims as to property manager.	PFV	\$550.00	0.20	\$110.00
04/22/2023	Email regarding unit 202 additional access request.	PFV	\$550.00	0.10	\$55.00
04/23/2023	Work on complaint for partition, et al. with focus on request for expedited proceedings (0.3); work on waiver of service of summons in preparation of filing complaint for partition, et al (0.6).	MJL	\$350.00	0.90	\$315.00
04/24/2023	Analyze updated case law regarding Florida Rule of Civil Procedure 1.070 in preparation of working on waiver of service of summons (0.2); work on civil cover sheet (0.2); work on waiver of service of summons (0.4); email communications with Receiver regarding threats towards property manager (0.3); communications with E. Connor regarding same (0.1).	MJL	\$350.00	1.20	\$420.00
04/24/2023	Emails and texts regarding former manager and harassment issues and response by Receiver.	MME	\$550.00	0.50	\$275.00
04/24/2023	(No charge) Managing resident access and recovery of possession on property.	og		8.00	\$0.00
04/24/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	5.00	\$600.00
04/24/2023	Call with Denise Brooks regarding threat of physical violence upon her.	PFV	\$550.00	0.20	\$110.00
04/24/2023	Email with Receiver regarding same.	PFV	\$550.00	0.20	\$110.00
04/24/2023	Review email regarding possible coverage issues.	PFV	\$550.00	0.20	\$110.00
04/24/2023	Text with Denise Brooks regarding threats.	PFV	\$550.00	0.20	\$110.00
04/24/2023	Multiple email with receiver and team regarding status and security issues.	PFV	\$550.00	0.70	\$385.00
04/24/2023	Email regarding waiver of service of process.	PFV	\$550.00	0.30	\$165.00
04/24/2023	Work on Partition complaint.	PFV	\$550.00	0.30	\$165.00
04/24/2023	Email with insurance adjuster regarding unit 244.	PFV	\$550.00	0.30	\$165.00
04/24/2023	Email with counsel for unit owner regarding collection of maintenance.	PFV	\$550.00	0.20	\$110.00
04/24/2023	Additional work on proposed order granting receiver's application for order authorizing payment of fees and expenses and for authorization to distribute funds (.2); additional work on finalize and file partition complaint (1.0).	rs	\$100.00	1.20	\$120.00
04/25/2023	(No charge) Assist with Complaint court filing; adding additional Defendants and contact information to queue.	lfd		1.20	\$0.00
04/25/2023	Investigation into respondent entities via Sunbiz in preparation of updating style of case on complaint for partition and declaratory judgment (1.6); work on complaint for partition and declaratory judgment with focus on names of individual defendants set forth in style of case (0.6); work on list of registered agents and addresses for same in preparation of serving complaint upon representative entities (1.2); work on notice of lawsuit and request for waiver of service of summons (0.8).	MJL	\$350.00	4.20	\$1,470.00

04/25/2023	Revising waiver of service form and responding to M. Levine.	MME	\$550.00	0.30	\$165.00
04/25/2023	(Reduced time) Managing resident access and recovery of possessions on property.	og	\$120.00	4.00	\$480.00
04/25/2023	Managing resident access and recovery of possessions on property.	dj	\$120.00	8.00	\$960.00
04/26/2023	Work on notice of lawsuit and request for waiver in preparation of sending same to respondents in partition action.	MJL	\$350.00	2.30	\$805.00
04/26/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	6.00	\$720.00
04/26/2023	Managing resident access and recovery of possessions on property.	dj	\$120.00	6.00	\$720.00
04/27/2023	Emails regarding security company (.2); emails regarding status of Partition (.2).	MME	\$550.00	0.40	\$220.00
04/27/2023	Managing resident access and recovery of possessions on property.	dj	\$120.00	8.00	\$960.00
04/27/2023	Review email regarding move out schedule.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Analyze emails from D. Jannell regarding photos of units which have been denied access by building official (0.3); email communications with same unit owners regarding same (1.1); work on waiver of service of process (0.3); work on notice of lawsuit and request for waiver (0.4); email communications with unit owner regarding next zoom meeting with residents (0.1); work on website post regarding partition action (0.3); email communications with D. Heimberger regarding same (0.1).	MJL	\$350.00	2.60	\$910.00
04/28/2023	Managing resident access and recovery of possessions on property.	dj	\$120.00	8.00	\$960.00
04/28/2023	Call with project manager regarding moving out and related matters.	PFV	\$550.00	0.30	\$165.00
04/28/2023	Email regarding distribution of photos regarding.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Draft email regarding claim notification.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Revise notice of make up dates for Phase II move outs and related rules.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Email regarding unit 223/224 regarding photos and reasons for no access.	PFV	\$550.00	0.10	\$55.00
04/28/2023	Email regarding insurance renewal.	PFV	\$550.00	0.10	\$55.00
04/28/2023	Conference with the building official regarding request to remove air conditioning equipment.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Draft email to receiver regarding posting partition action, update with Building Official, and possible timeline for demolition of building.	PFV	\$550.00	0.40	\$220.00
04/28/2023	Communication with project manager regarding protocol for trespassers.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Communication with project manager regarding response to request to remove fixtures.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Draft email to R. Zellman regarding real estate related title issues.	PFV	\$550.00	0.30	\$165.00

04/28/2023	Review postings regarding unit owner meeting and waiver of service request.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Review complaint regarding division assignment and draft email regarding motion to transfer.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Email with adjuster for unit 114, Scott Mackanick regarding unit access.	PFV	\$550.00	0.20	\$110.00
04/28/2023	Review and revise notice of request for waiver.	PFV	\$550.00	0.10	\$55.00
04/28/2023	Review and revise waiver form.	PFV	\$550.00	0.10	\$55.00
04/30/2023	Work on motion to transfer partition action from CA 30 to CA 11 with focus on argument concerning how the partition action and the receivership action are related (0.7); same with focus on potential prejudice to parties and court if case is not transferred (0.4).	MJL	\$350.00	1.10	\$385.00
04/30/2023	Conference with project manager regarding status of move outs.	PFV	\$550.00	0.20	\$110.00
04/30/2023	Email regarding unit 231 request for explanation why entry was not permitted.	PFV	\$550.00	0.20	\$110.00
04/30/2023	Email regarding unit owner contact regarding requests for waiver of service by email.	PFV	\$550.00	0.20	\$110.00
04/30/2023	(No charge) Emails to and from receiver's office regarding scheduling upcoming owners' meeting (.1); email to D. Bissell regarding upcoming owners' meeting and website (.1); mass email to owners regarding upcoming meeting (.3).	rs		0.50	\$0.00
05/01/2023	Work on motion to transfer partition action to same revision as receivership action with focus on updating factual background section.	MJL	\$350.00	0.30	\$105.00
05/01/2023	Managing resident access and recovery of possession on property.	og	\$120.00	3.00	\$360.00
05/01/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	5.00	\$600.00
05/01/2023	Work on motion to transfer.	PFV	\$550.00	0.20	\$110.00
05/01/2023	Email with co-counsel and Receiver regarding payment of Vanguard estimator invoice.	PFV	\$550.00	0.20	\$110.00
05/01/2023	Draft post for website regarding waiver and notice (.2); receipt and review of order setting case management deadlines (.3).	rs	\$100.00	0.50	\$50.00
05/02/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/02/2023	Email communications with unit owners regarding photos of inability to access units (0.2); email communications with Receiver regarding motion to transfer (0.1); analyze motion to withdraw in preparation of hearing on same (0.1); appear at hearing on motion to withdraw on behalf of Receiver and Association (0.3).	MJL	\$350.00	0.70	\$245.00
05/02/2023	Conference with counsel for unit owner's lender regarding unit 218-219.	PFV	\$550.00	0.30	\$165.00
05/02/2023	(No charge) Review order on motion to withdraw.	PFV		0.10	\$0.00
05/02/2023	Conference with R. Zellman regarding title examination and sale planning.	PFV	\$550.00	0.40	\$220.00

05/02/2023	Receipt and review of email from attorney for Residential Mortgage regarding acceptance of service (.2); email to and from counsel regarding waiver (.1); email to D. Bissell regarding post for website (.1); mass email to owners regarding waiver (.2).	rs	\$100.00	0.60	\$60.00
05/03/2023	Email communications with unit owners and residents regarding scheduling makeup dates to retrieve personal items from units.	MJL	\$350.00	0.20	\$70.00
05/03/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/03/2023	Conference with project manager regarding move out schedule.	PFV	\$550.00	0.30	\$165.00
05/03/2023	Draft status email regarding move out.	PFV	\$550.00	0.30	\$165.00
05/03/2023	Draft email regarding title issues.	PFV	\$550.00	0.40	\$220.00
05/03/2023	Review and respond to email regarding insurance.	PFV	\$550.00	0.30	\$165.00
05/03/2023	Review email from Mr. Black.	PFV	\$550.00	0.10	\$55.00
05/03/2023	Draft email to Mr. Black regarding building being untenable.	PFV	\$550.00	0.20	\$110.00
05/03/2023	(No charge) Email regarding hearing on transfer motion.	PFV		0.10	\$0.00
05/03/2023	Email regarding real estate counsel.	PFV	\$550.00	0.20	\$110.00
05/03/2023	Email regarding service of process upon lenders.	PFV	\$550.00	0.10	\$55.00
05/03/2023	Prepare for (.2); and attend (1.4); unit owner meeting.	PFV	\$550.00	1.60	\$880.00
05/03/2023	(No charge) Review Judge's calendar to set hearing on motion to transfer in partition action (.2); email to P. Valori regarding same (.1).	rs		0.30	\$0.00
05/04/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/04/2023	Analyze memorandum from E. Thompson concerning insurance matters in preparation of sending notices to insurers of claims brought against the Association (0.6); analyze declaration for umbrella coverage in preparation of same (0.6); analyze declaration for general liability coverage in preparation of same (0.5).	MJL	\$350.00	1.70	\$595.00
05/04/2023	Review email regarding notice to insurance company of claims.	PFV	\$550.00	0.10	\$55.00
05/04/2023	Review email to security company regarding access.	PFV	\$550.00	0.10	\$55.00
05/04/2023	Confer with M. Levine regarding update as to unit owner meeting.	PFV	\$550.00	0.20	\$110.00
05/04/2023	Email with foreclosure lawyer regarding claim of debt by the association.	PFV	\$550.00	0.10	\$55.00
05/04/2023	Conference regarding planning as to security and move out schedule.	PFV	\$550.00	0.40	\$220.00
05/04/2023	Draft email to Building Official regarding move out scheduled and site security.	PFV	\$550.00	0.20	\$110.00
05/04/2023	(No charge) Prepare and file notice of hearing on motion to transfer in partition action (.2); upload same to Judge's calendar (.1).	rs		0.30	\$0.00

05/05/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/06/2023	Email regarding remaining move out visits.	PFV	\$550.00	0.10	\$55.00
05/06/2023	Email with regarding lender service of process regarding unit 218/219.	PFV	\$550.00	0.10	\$55.00
05/08/2023	Email communications with unit owners and tenants regarding make up days to retrieve belongings in units (0.6); analyze documents provided by L. Baptiste to determine potential liabilities of third parties (0.8).	MJL	\$350.00	1.40	\$490.00
05/08/2023	Review email regarding contacts from unit owners and work on responses to same.	PFV	\$550.00	0.30	\$165.00
05/08/2023	Confer with R. Zellman regarding title issues.	PFV	\$550.00	0.60	\$330.00
05/09/2023	Work on obtaining current addresses for residents whose addresses are listed within the Condominium Association (0.4); analyze umbrella insurance coverage documents in preparation of working on letter to insurer (0.6); analyze general liability insurance coverage documents in preparation of working on letter to insurer (0.6).	MJL	\$350.00	1.60	\$560.00
05/09/2023	Email regarding real estate title issues.	PFV	\$550.00	0.10	\$55.00
05/09/2023	Email regarding service of process upon lenders.	PFV	\$550.00	0.10	\$55.00
05/09/2023	Email regarding request for post 5.27.23 make up regarding Ms. Pollard.	PFV	\$550.00	0.20	\$110.00
05/09/2023	Email regarding account balance inquiry.	PFV	\$550.00	0.20	\$110.00
05/09/2023	Email regarding address information regarding partition service of process.	PFV	\$550.00	0.10	\$55.00
05/09/2023	Review email regarding balance inquiry response.	PFV	\$550.00	0.10	\$55.00
05/09/2023	Draft email regarding June 2, 2023 make up date.	PFV	\$550.00	0.10	\$55.00
05/09/2023	Email with Building Official regarding status.	PFV	\$550.00	0.20	\$110.00
05/09/2023	Prepare summonses to non-owner entities (.6); continue bates labeling documents received from Prestige and D. Brooks via shared file (.9).	rs	\$100.00	1.50	\$150.00
05/10/2023	Email communications with unit owners regarding inspections of units for insurance purposes.	MJL	\$350.00	0.20	\$70.00
05/10/2023	Email regarding service of process protocol.	PFV	\$550.00	0.30	\$165.00
05/10/2023	Email regarding process to more waivers.	PFV	\$550.00	0.20	\$110.00
05/10/2023	Email regarding response to potential inquiry.	PFV	\$550.00	0.10	\$55.00
05/10/2023	Email regarding Ferguson case.	PFV	\$550.00	0.10	\$55.00
05/10/2023	Email regarding status of service and title discussion.	PFV	\$550.00	0.30	\$165.00
05/10/2023	Email with potential buyer.	PFV	\$550.00	0.10	\$55.00
05/10/2023	Email to and from P. Valori regarding strategy for waivers and service of process on unit owners (.2); finalize and submit summonses to clerk for issuance (1.0); draft template email to owners regarding waiver and notice (.3); complete bates labeling documents received from Prestige and D. Brooks (1.5).	rs	\$100.00	3.00	\$300.00
05/11/2023	Email regarding unit owner make-up date scheduling.	PFV	\$550.00	0.10	\$55.00
05/11/2023	Revise notice regarding waiver request.	PFV	\$550.00	0.10	\$55.00

05/11/2023	Email with Receiver regarding timeline for partition service of process.	PFV	\$550.00	0.20	\$110.00
05/11/2023	Review email regarding notice to unit owner regarding developer inquiry.	PFV	\$550.00	0.10	\$55.00
05/11/2023	Additional email with potential investor.	PFV	\$550.00	0.10	\$55.00
05/11/2023	Review file and conference with real estate lawyer regarding title commitment policy request and title searches.	PFV	\$550.00	0.50	\$275.00
05/11/2023	Email regarding June 2, 2023 make update.	PFV	\$550.00	0.10	\$55.00
05/11/2023	Email regarding response to request for explanation of waiver of service of process email.	PFV	\$550.00	0.20	\$110.00
05/11/2023	Draft proposed post for website regarding visiting counsel's office to sign waiver or send via mail (.3); email to D. Bissell regarding same (.1).	rs	\$100.00	0.40	\$40.00
05/12/2023	Email communications with D. Wagner and C. Prieto regarding condominium documents, insurance documents, and management agreement.	MJL	\$350.00	0.10	\$35.00
05/12/2023	Review file regarding insurance matters (.2); and conference with class action lawyers (.4).	PFV	\$550.00	0.60	\$330.00
05/12/2023	Email regarding class action case.	PFV	\$550.00	0.30	\$165.00
05/12/2023	Emails to and from counsel from Nationstar regarding representation and waivers (.2); emails to and from receiver's office regarding upcoming owners' meeting (.1).	rs	\$100.00	0.30	\$30.00
05/14/2023	Email regarding lender service of process.	PFV	\$550.00	0.20	\$110.00
05/15/2023	Call with Rick Zellman regarding title matters.	PFV	\$550.00	0.30	\$165.00
05/15/2023	Review email regarding service on certain lenders.	PFV	\$550.00	0.10	\$55.00
05/15/2023	Email regarding crime policy renewal.	PFV	\$550.00	0.10	\$55.00
05/15/2023	Draft email regarding service list in partition action.	PFV	\$550.00	0.10	\$55.00
05/15/2023	Email to and from counsel for New Residential mortgage regarding representation and waivers (.2); continue efforts to coordinate owners' meeting (.1); email to and from A. Ruff regarding notices from court on partition action (.2).	rs	\$100.00	0.50	\$50.00
05/16/2023	Work on obtaining current mailing addresses for unit owners whose addresses are listed at the condominium property, including emailing unit owners regarding same and looking through file to obtain same information (1.1); work on spreadsheet regarding waiver forms in preparation of service of summons (0.6).	MJL	\$350.00	1.70	\$595.00
05/16/2023	Email regarding request for post June 8 move out date regarding unit 101.	PFV	\$550.00	0.10	\$55.00
05/16/2023	Email regarding adjuster access, unit 116.	PFV	\$550.00	0.10	\$55.00
05/16/2023	Review memorandum from real estate counsel regarding title searches and pre-sale title insurance issues analysis.	PFV	\$550.00	0.10	\$55.00
05/16/2023	Draft email regarding same.	PFV	\$550.00	0.20	\$110.00

05/16/2023	Receipt and review of email from Clerk regarding non-owners' summonses (.1); revise summonses in accordance with clerk's instructions (.3); resubmit same (.1).	rs	\$100.00	0.50	\$50.00
05/17/2023	Prepare for (.1); an attend (.3); hearing on motion to transfer.	PFV	\$550.00	0.40	\$220.00
05/17/2023	Review order or transfer and update receiver.	PFV	\$550.00	0.10	\$55.00
05/17/2023	Review email regarding address research regarding service of partition action.	PFV	\$550.00	0.10	\$55.00
05/17/2023	Email with counsel for insurer as to unit 114.	PFV	\$550.00	0.30	\$165.00
05/17/2023	Email to P. Valori regarding status of waivers and strategy.	rs	\$100.00	0.20	\$20.00
05/18/2023	Email with Mr. MacKanick regarding property access.	PFV	\$550.00	0.30	\$165.00
05/18/2023	Email regarding upcoming owner meeting.	PFV	\$550.00	0.20	\$110.00
05/18/2023	Prepare status email.	PFV	\$550.00	0.30	\$165.00
05/18/2023	Email to and from D. Bissell regarding posting on website (.2); continue efforts to schedule next owners' meeting; receipt and review of issued summonses to non-owner entities in partition action (.3); email to and from process server for service on same (.2); work on bates labeling scanned documents from boxes received from Prestige (.5).	rs	\$100.00	1.20	\$120.00
05/19/2023	Review email regarding title examination.	PFV	\$550.00	0.10	\$55.00
05/19/2023	Work on case analysis regarding response to potential subrogation claims.	PFV	\$550.00	0.20	\$110.00
05/19/2023	Email regarding inspection of unit 116.	PFV	\$550.00	0.20	\$110.00
05/19/2023	(No charge) Continue bates labeling scanned documents from boxes received from Prestige.	rs		1.50	\$0.00
05/19/2023	Email communications with Receiver regarding next meeting with unit owners (0.1); email communications with unit owners regarding same (0.1).	MJL	\$350.00	0.20	\$70.00
05/22/2023	Email with Scott Mackanick regarding unit 114 and other areas of the building inspection.	PFV	\$550.00	0.20	\$110.00
05/22/2023	Email with Building Official regarding same.	PFV	\$550.00	0.20	\$110.00
05/22/2023	Draft message to unit owner regarding same.	PFV	\$550.00	0.20	\$110.00
05/22/2023	Additional email regarding inspection.	PFV	\$550.00	0.20	\$110.00
05/23/2023	Revise summons for US Secretary of Housing & Urban Development (.2); email to and from clerk regarding same for issuance (.1); email to process server with issued summons (.1); bates labeling scanned documents from boxes received from Prestige (.5).	rs	\$100.00	0.90	\$90.00
05/24/2023	Analyze documents in first of four boxes provided by Prestige and Denise to Receiver with focus on determining potential liability of third parties for potential clawback actions (2.1); email communications with Receiver regarding redacting confidential information of unit owners from same prior to returning such documents (0.2).	MJL	\$350.00	2.30	\$805.00

05/24/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/24/2023	Conference with project manager regarding status and upcoming unit owner, adjuster, and fire causation inspections.	PFV	\$550.00	0.40	\$220.00
05/24/2023	Review visitation schedule summary.	PFV	\$550.00	0.10	\$55.00
05/24/2023	Prepare update for receiver regarding same.	PFV	\$550.00	0.10	\$55.00
05/24/2023	Email with paralegal regarding Prestige document turn over and related matters.	PFV	\$550.00	0.30	\$165.00
05/24/2023	Email and calls regarding unit owner requests for access without appointment.	PFV	\$550.00	0.20	\$110.00
05/24/2023	Review billing documents from receiver (.1); and draft email regarding fee application (.1).	PFV	\$550.00	0.20	\$110.00
05/24/2023	Review email regarding title policy request.	PFV	\$550.00	0.10	\$55.00
05/24/2023	Email to D. Bissell regarding new post for website (.2); mass email to unit owners regarding next owners' meeting (.3); complete bates labeling scanned documents from boxes received from Prestige (1.0).	rs	\$100.00	1.50	\$150.00
05/25/2023	Email communications with D. Brooks regarding insurance of Prestige Management Solutions, Inc. (0.2); email communications with Receiver regarding same (0.1); work on memorandum regarding liability of property management company (0.9).	MJL	\$350.00	1.20	\$420.00
05/25/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
05/25/2023	Email with receiver regarding Valtom (unit 206) lawsuit.	PFV	\$550.00	0.10	\$55.00
05/25/2023	Email regarding demand to roofing company insurer.	PFV	\$550.00	0.10	\$55.00
05/25/2023	Review email from Rocket Mortgage regarding update to servicer (.1); and draft response (.1).	PFV	\$550.00	0.20	\$110.00
05/25/2023	Review email regarding Delaware registered agent Aegis regarding mortgage holder service in partition action.	PFV	\$550.00	0.10	\$55.00
05/25/2023	Work on review of potential claims as to property manager.	PFV	\$550.00	0.70	\$385.00
05/25/2023	Review update from project manager.	PFV	\$550.00	0.10	\$55.00
05/25/2023	Draft update to Building Official.	PFV	\$550.00	0.10	\$55.00
05/25/2023	Emails to and from process server regarding status of Aegis Wholesale Corp. (.1); research corporation online and obtain cease and desist order (.3); email to P. Valori regarding same (.2).	rs	\$100.00	0.60	\$60.00
05/26/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	7.50	\$900.00
05/26/2023	Review email with counsel for mortgage company regarding unit 234.	PFV	\$550.00	0.10	\$55.00
05/26/2023	Emails to and from counsel for New Residential Mortgage regarding assignment of mortgage to New Rez, LLC.	rs	\$100.00	0.20	\$20.00
05/28/2023	Draft email regarding status of service of process and amendments needed.	PFV	\$550.00	0.10	\$55.00

05/29/2023	Email regarding proposed amendment and updated titles search report.	PFV	\$550.00	0.10	\$55.00
05/30/2023	Work on letter to insurance company regarding class action lawsuits (0.4); work on litigation plan regarding potential claw back cases (0.7).	MJL	\$350.00	1.10	\$385.00
05/30/2023	Conference with Carlos Prieto regarding Forty Year entity class action.	PFV	\$550.00	0.50	\$275.00
05/30/2023	Work on preliminary analysis memorandum regarding case analysis.	PFV	\$550.00	0.50	\$275.00
05/31/2023	Work on insurance company notification of claims.	PFV	\$550.00	0.30	\$165.00
06/01/2023	Work on notice of claims regarding the Association's umbrella insurance coverage (0.6); work on notice of claims regarding the Association's general liability insurance coverage (0.6); email communications with Receiver regarding same (0.1); work on litigation plan concerning clawback cases with focus on potential claims against roofing company and property management company (1.4); analyze bank statements provided by property management company to determine potential claims against same and roofing company and others (0.9); analyze meeting minutes provided by same to determine same (1.3).	MJL	\$350.00	4.90	\$1,715.00
06/01/2023	Team meeting to analyze insurance policies and potential claims.	MME	\$550.00	2.00	\$1,100.00
06/01/2023	Prepare status email to the Receiver regarding class action cases.	PFV	\$550.00	0.20	\$110.00
06/01/2023	Review letters to insurance companies regarding notices of claims.	PFV	\$550.00	0.20	\$110.00
06/01/2023	Review and revise analytical notes regarding potential claims and defenses.	PFV	\$550.00	0.50	\$275.00
06/01/2023	Prepare for conference regarding claims analysis.	PFV	\$550.00	0.60	\$330.00
06/01/2023	Attend conference regarding potential claims and defenses and insurance analysis.	PFV	\$550.00	2.00	\$1,100.00
06/01/2023	Prepare for conference with unit owners.	PFV	\$550.00	0.30	\$165.00
06/01/2023	Attend conference with unit owners regarding status and planning.	PFV	\$550.00	1.10	\$605.00
06/02/2023	Work on complaint against Prestige with focus on claim for breach of fiduciary duty (1.1); same with focus on claim for gross negligence (0.8).	MJL	\$350.00	1.90	\$665.00
06/04/2023	Email regarding service of process on banks regarding partition suit.	PFV	\$550.00	0.10	\$55.00
06/04/2023	(No charge) Email from and to process server regarding service on non-owner entity regarding partition action (.1); email to P. Valori regarding same (.1).	rs		0.20	\$0.00

06/05/2023	Analyze condominium management agreement in preparation of working on complaint against Prestige Management Solutions Inc. (0.4); analyze updated case law regarding statutory fiduciary duties of community association management firm in preparation of same (0.6); analyze updated case law regarding common law breaches of fiduciary duty against condominium association manager in preparation of same (0.7); work on complaint with focus on factual allegations regarding defendant's duties under management agreement (0.9).	MJL	\$350.00	2.60	\$910.00
06/05/2023	Email regarding adjuster inquiry as to Unit 110 and 128 as to floor plan square footage request and request for access.	PFV	\$550.00	0.30	\$165.00
06/05/2023	Email with lender on unit 231 regarding request for stipulation of lien priority.	PFV	\$550.00	0.30	\$165.00
06/06/2023	Research regarding partition sale process and procedures.	gt	\$150.00	1.30	\$195.00
06/06/2023	(No charge) Review notice of appearance and motion for extension filed by Countrywide.	PFV		0.10	\$0.00
06/06/2023	Draft email regarding communication with counsel for Countrywide.	PFV	\$550.00	0.10	\$55.00
06/06/2023	Multiple email regarding Shorn lender request for lien priority stipulation.	PFV	\$550.00	0.60	\$330.00
06/06/2023	Email with Karina and Raul Latorre regarding status and waiver of service.	PFV	\$550.00	0.30	\$165.00
06/06/2023	Email regarding unit 115 waiver.	PFV	\$550.00	0.10	\$55.00
06/06/2023	Analyze documents provided by D. Brooks in preparation of continued work on complaint against community association management company (2.3); analyze waiver of service of process, motion for extension of time, and notice of appearance filed on behalf of Countrywide in partition action (0.2); analyze office memorandum regarding marital property to determine whether to file claw back action against individual board members (0.3); work on complaint against Prestige with focus on claim for accounting (0.4); same with focus on claim for negligence (0.7); same with focus on claim for breach of contract (0.8).	MJL	\$350.00	4.70	\$1,645.00
06/06/2023	Email to counsel from Countrywide Home Loans regarding partition action.	rs	\$100.00	0.20	\$20.00
06/07/2023	Email regarding waste company collection.	PFV	\$550.00	0.10	\$55.00
06/07/2023	Email from adjuster for Umbrella insurer.	PFV	\$550.00	0.10	\$55.00
06/07/2023	Prepare response to email from adjuster from Umbrella carrier.	PFV	\$550.00	0.40	\$220.00
06/07/2023	Draft email to team regarding stay motion as to Whitfield case.	PFV	\$550.00	0.30	\$165.00
06/07/2023	Review status report from project manager.	PFV	\$550.00	0.10	\$55.00

06/07/2023	Analyze bates labeled documents provided by Prestige to determine potential third party liability to association (1.6); analyze same to determine current contact information for certain unit owners (0.7); work on list of offers to purchase condominium property (0.3); email communications with unit owners regarding damage to property (0.2).	MJL	\$350.00	2.80	\$980.00
06/08/2023	Work on motion to dismiss or stay class action (0.9); analyze administrative orders on transfers in preparation of working on motion to transfer class action to Judge Lopez's division (0.3); work on motion to transfer class action to Judge Lopez's division (1.4).	MJL	\$350.00	2.60	\$910.00
06/08/2023	Review draft motion to stay and provide comments regarding scope of relief and motion to transfer.	PFV	\$550.00	0.40	\$220.00
06/08/2023	Review memorandum regarding homestead exemption as to possible claims against directors.	PFV	\$550.00	0.30	\$165.00
06/08/2023	Email with lender's counsel regarding unit 137 (.1); and draft response (.2).	PFV	\$550.00	0.30	\$165.00
06/08/2023	Review marital assets memorandum regarding potential third party claims.	PFV	\$550.00	0.10	\$55.00
06/09/2023	Review email regarding Mr. Archie's report of denial of homeowner's coverage and draft response.	PFV	\$550.00	0.20	\$110.00
06/09/2023	Review email and prepare response to unit owner of unit 133 request for information.	PFV	\$550.00	0.20	\$110.00
06/09/2023	Conference regarding research issues as to potential collections as to directors and theories of recovery.	PFV	\$550.00	0.80	\$440.00
06/09/2023	Email regarding Ms. Anderson threat to access unsafe structure.	PFV	\$550.00	0.20	\$110.00
06/09/2023	Draft status email to Receiver.	PFV	\$550.00	0.20	\$110.00
06/09/2023	Work on motion to transfer.	PFV	\$550.00	0.40	\$220.00
06/09/2023	Work on email to Receiver regarding same and litigation planning.	PFV	\$550.00	0.40	\$220.00
06/10/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	8.00	\$960.00
06/11/2023	Work on motion to dismiss or to stay the Whitfield case.	PFV	\$550.00	0.60	\$330.00
06/11/2023	Review email regarding an interested buyer.	PFV	\$550.00	0.10	\$55.00
06/11/2023	Draft email to interested buyer regarding partition action.	PFV	\$550.00	0.30	\$165.00
06/11/2023	Review email regarding title search status.	PFV	\$550.00	0.10	\$55.00
06/11/2023	Draft email regarding amendments to update defendant list.	PFV	\$550.00	0.20	\$110.00
06/12/2023	Email communications with K. Latorre regarding waiver of service of summons (0.2); email communications with unit owners concerning damage to units which are unsafe to enter (0.2); work on motion to stay class action with focus on Barton doctrine (0.4).	MJL	\$350.00	0.80	\$280.00
06/12/2023	Review notice of appearance and motion for extension regarding US Bank.	PFV	\$550.00	0.10	\$55.00
06/12/2023	Review Nationstar waiver of service of process.	PFV	\$550.00	0.10	\$55.00

06/12/2023	Email with counsel for Ms. Whitfield regarding motion to stay and to dismiss.	PFV	\$550.00	0.20	\$110.00
06/12/2023	Review notice of appearance and motion for extension by Citimortgage.	PFV	\$550.00	0.10	\$55.00
06/12/2023	Work on motion to stay/dismiss Whitfield case.	PFV	\$550.00	0.80	\$440.00
06/13/2023	Work on litigation planning regarding partition action.	PFV	\$550.00	0.30	\$165.00
06/13/2023	Work on analysis regarding insurance issues and third party lawsuits.	PFV	\$550.00	0.30	\$165.00
06/13/2023	Reviewing motion to dismiss or stay and responding to co-counsel.	MME	\$550.00	0.40	\$220.00
06/14/2023	Email communications with the Receiver concerning motion to dismiss or stay class action lawsuit in preparation of filing same (0.1); email communications with D. Robinson concerning same (0.1); conferral with counsel in class action case regarding motion to transfer and motion to stay or dismiss litigation (0.2).	MJL	\$350.00	0.40	\$140.00
06/14/2023	Email to and from counsel for owner, Valtom LLC regarding partition action (.2); email to and from process service regarding service and affidavits on non-owner entities (.2).	rs	\$100.00	0.40	\$40.00
06/15/2023	Review revised memorandum regarding potential claims against directors.	PFV	\$550.00	0.20	\$110.00
06/15/2023	Email regarding unit owner conference.	PFV	\$550.00	0.10	\$55.00
06/15/2023	Emails to and from process server regarding service of partition complaint (.1); efforts to coordinate next owners' zoom meeting (.2).	rs	\$100.00	0.30	\$30.00
06/17/2023	Email regarding World Bank appearance and extension.	PFV	\$550.00	0.20	\$110.00
06/19/2023	Analyze notice of appearance and motion for extension of time filed by US Bank in the partition action (0.1); email communications with Y. Strader regarding conferral on motion to transfer and motion to dismiss and stay partition action (0.1); work on complaint against community association management firm with focus on introduction section (0.6); same with focus on parties, venue and jurisdiction section (0.8); same with focus on claim for breach of contract (0.7); same with focus on claim for accounting (0.4); same with focus on claim for statutory breach of fiduciary duty (0.6).	MJL	\$350.00	3.30	\$1,155.00
06/19/2023	Reviewing update on service and pending issues to move Partition action.	MME	\$550.00	0.40	\$220.00
06/19/2023	Preliminary review of title search report.	PFV	\$550.00	0.30	\$165.00
06/19/2023	Prepare email regarding update of defendant class and lien summary.	PFV	\$550.00	0.20	\$110.00
06/19/2023	Review insurance renewal proposal (.3); and draft email regarding same (.1).	PFV	\$550.00	0.40	\$220.00
06/19/2023	Email with counsel for Plaintiff regarding Whitfield case.	PFV	\$550.00	0.20	\$110.00
06/19/2023	Email from lender counsel regarding percentages of ownership.	PFV	\$550.00	0.20	\$110.00
06/19/2023	Review email regarding adjuster inquiry.	PFV	\$550.00	0.10	\$55.00

06/19/2023	Email to and from receiver's office regarding upcoming owners' meeting (.2); emails to and from counsel for US Bank regarding extension of time to answer partition complaint (.2); email to and from D. Bissell regarding new website posting (.1); mass email to owners regarding next zoom meeting (.2).	rs	\$100.00	0.70	\$70.00
06/20/2023	Work on motion to transfer class action case with focus on certificate of conferral in light of Y. Strader's conferral response (0.2); same as to motion to transfer (0.2); work on motion to show cause regarding same (0.2); email communications with the Receiver regarding foregoing motions (0.2); analyze litigation plan regarding potential claims against Prestige (0.6); analyze Accurint report for B. Scott to determine whether she has any recoverable assets and work on summary regarding same (0.3); same for H. Touzalin to determine same (0.4); same for E. Williams to determine same and work on summary regarding same (0.4); same for K. Pollard to determine same and work on summary regarding same (0.4); same for J. Simpson to determine same and work on summary regarding same (0.3); analyze deed of H. Touzalin's home located in Leesburg, Florida to determine same (0.2); same for K. Pollard regarding home in Miami-Dade County to determine same (0.2); same for J. Simpson located in same to determine same (0.2).	MJL	\$350.00	3.80	\$1,330.00
06/20/2023	Meeting with P. Valori regarding strategy for potential claims and competing class claims.	MME	\$550.00	0.80	\$440.00
06/20/2023	Work on analysis of claims against Prestige and third party claims against association.	PFV	\$550.00	0.70	\$385.00
06/20/2023	Review memorandum regarding potential claims against association directors.	PFV	\$550.00	0.20	\$110.00
06/20/2023	Conference regarding assets searches.	PFV	\$550.00	0.10	\$55.00
06/20/2023	Call with Rick Zellman regarding title search report.	PFV	\$550.00	0.20	\$110.00
06/20/2023	(No charge) Conference with M. Levine regarding potential director claims.	PFV		0.20	\$0.00
06/20/2023	Email regarding title search report conference.	PFV	\$550.00	0.10	\$55.00
06/20/2023	Review and revise meet and conference regarding motion to dismiss and motion to stay.	PFV	\$550.00	0.30	\$165.00
06/20/2023	Email regarding general liability insurance carrier question and insurance payment.	PFV	\$550.00	0.20	\$110.00
06/20/2023	Review notice of appearance regarding Ried Manley.	PFV	\$550.00	0.10	\$55.00
06/20/2023	Review waivers received from owners regarding partition action (.3); compile list for telephone calls to owners who have not executed a waiver (.3); emails to and from G. Santa Cruz regarding same (.2).	rs	\$100.00	0.80	\$80.00
06/21/2023	Conference with insurance company regarding subrogation claims.	PFV	\$550.00	0.30	\$165.00
06/23/2023	Review email regarding insurance coverage and draft email regarding same.	PFV	\$550.00	0.20	\$110.00
06/23/2023	Call with real estate transactional counsel regarding title search report schedule B-1 matters.	PFV	\$550.00	0.90	\$495.00

06/23/2023	Email with potential buyer regarding status of partition case.	PFV	\$550.00	0.10	\$55.00
06/24/2023	Email regarding waiver of service of process.	PFV	\$550.00	0.10	\$55.00
06/24/2023	Review status reports regarding move outs, trash removal and property status matters.	PFV	\$550.00	0.20	\$110.00
06/24/2023	Draft email regarding same.	PFV	\$550.00	0.40	\$220.00
06/24/2023	Managing resident access and recovery of possession on property.	dj	\$120.00	6.00	\$720.00
06/25/2023	Analyze correspondence from counsel for Commercial Laundries, Inc. in preparation of responding to same (0.1); work on letter to above-reference counsel concerning removal of laundry equipment (0.4).	MJL	\$350.00	0.50	\$175.00
06/26/2023	Analyze documents produced by D. Brooks regarding to determine updated contact information for J. Saintlien (0.7); same for J. Lewis (0.6); same for C. Pivelon (0.3); analyze Accurint reports for individual board members to determine whether they own recoverable assets in preparation of determining whether to pursue litigation against them (0.4); analyze public records to determine same in preparation of same (0.3); work on summary of assets for individual board members in preparation of same (0.8); email communications with receiver regarding same (0.1); analyze updated case law regarding homestead exempt property to determine whether real property of married board members can be executed upon (0.4).	MJL	\$350.00	3.60	\$1,260.00
06/26/2023	(No charge) Review court file regarding Whitfield Class Action (.3); email to and from M. Levine regarding same (.2); email to G. Santa Cruz regarding same (.2); review Judge Bailey's transfer calendar (.2); coordinate scheduling hearing on motion to transfer (.2); email to P. Valori regarding same (.1); emails to and from opposing counsel regarding availability (.1).	rs		1.30	\$0.00
06/26/2023	Update master spreadsheet regarding Partition Action respondents (.3); email to P. Valori and M. Levine regarding executed waivers, update regarding attempts to obtain waivers from others and strategy moving forward (.3).	rs	\$100.00	0.60	\$60.00
06/27/2023	Analyze the Association's general liability insurance coverage and its umbrella policy to determine identity of named insured and whether officers and directors are included in definition of same in preparation of responding to email communications from insurer regarding coverage (0.2); email communications with insurer regarding same as to class action lawsuit (0.1); analyze email communications between I. Moure and insurer concerning receivership case and enclosures attached thereto (0.2); email communications with insurer regarding same (0.1).	MJL	\$350.00	0.60	\$210.00
06/27/2023	Update meeting with Receiver.	MME	\$550.00	0.50	\$275.00
06/27/2023	Analyze correspondence from counsel for Chubb regarding notice of claim and potential outcomes regarding motions to transfer and to stay.	PFV	\$550.00	0.40	\$220.00
06/27/2023	Draft response email.	PFV	\$550.00	0.10	\$55.00

06/27/2023	Review email regarding U.S. Bank request for dismissal (.1); and review title search report (.3); and draft response email (.1).	PFV	\$550.00	0.50	\$275.00
06/27/2023	Zoom conference with Receiver regarding status and planning.	PFV	\$550.00	0.50	\$275.00
06/27/2023	Call with project manager regarding additional demolition quotes.	PFV	\$550.00	0.30	\$165.00
06/27/2023	Draft email regarding status of property, trash removal and demolition quotes.	PFV	\$550.00	0.30	\$165.00
06/27/2023	Telephone conference with Judge Bailey's chambers regarding motion to transfer in the Whitfield Class Action (.2); emails to and from M. Damian and P. Valori regarding same (.1); draft and finalize notice of hearing on motion to transfer (.2).	rs	\$100.00	0.50	\$50.00
06/28/2023	Email communications with Association's insurer concerning class action lawsuit.	MJL	\$350.00	0.10	\$35.00
06/28/2023	Email with adjuster from Chubb regarding Whitfield matter.	PFV	\$550.00	0.20	\$110.00
06/28/2023	Email regarding structure for motion to approve additional financing and demolition.	PFV	\$550.00	0.40	\$220.00
06/29/2023	Analyze title search in preparation of working on amended complaint (0.3); analyze complaint in preparation of same (0.3); work on amendments to same pursuant to comparison of foregoing documents (0.2); email communications with R. Katz regarding retrieval of client's laundry equipment (0.1).	MJL	\$350.00	0.90	\$315.00
06/29/2023	Review email regarding waiver status.	PFV	\$550.00	0.10	\$55.00
06/29/2023	Email regarding request for information from owner of unit 206 and draft response.	PFV	\$550.00	0.20	\$110.00
06/29/2023	Email regarding third parties harassing unit owners to sell and draft email to Receiver regarding same.	PFV	\$550.00	0.20	\$110.00
06/29/2023	Email regarding coordination of service of process (.1); and amendments to complaint (.1).	PFV	\$550.00	0.20	\$110.00
06/29/2023	Revise letter regarding laundry equipment lease.	PFV	\$550.00	0.20	\$110.00
06/29/2023	Email from and to P. Valori regarding status of Partition case.	rs	\$100.00	0.30	\$30.00
06/29/2023	Receipt and review of order setting initial case management conference and other notices and miscellaneous orders from court regarding Whitfield case (.3); email to P. Valori regarding same (.2).	rs	\$100.00	0.50	\$50.00
06/30/2023	Emails with co-counsel regarding class claims (.3); e-mails regarding partition action logistics (.2).	MME	\$550.00	0.50	\$275.00
06/30/2023	Review notice of Service of Process upon Prestige Management and draft planning email.	PFV	\$550.00	0.20	\$110.00
06/30/2023	Email to receiver regarding notice to laundry lease company.	PFV	\$550.00	0.10	\$55.00
06/30/2023	Email with counsel for US bank regarding extension request and request for information.	PFV	\$550.00	0.10	\$55.00

454.90 \$107,531.00

Costs & Expenses

Date	Description	Amount
03/02/2023	Safety chain and lock and supplies	\$182.81
03/14/2023	Photocopies - Staples	\$24.61
04/10/2023	Postage	\$2.40
04/27/2023	Miami Dade Circuit Court. Filing fee for Partition Complaint. 4.27.23	\$2,173.50
04/28/2023	Blacks Copy. Invoice 23057. Scanning 10,571 pages from New World Condominium documents. 4.28.23	\$2,035.97
04/30/2023	Lexis Nexis Advance Legal Research Fee	\$6.38
04/30/2023	Photocopies	\$15.48
05/01/2023	Receivership Telephone	\$20.00
05/01/2023	Postage	\$0.60
05/03/2023	Postage	\$0.60
05/17/2023	Miami Dade Circuit Court. E-Filing Thirteen Summons issue fee. 05.17.23	\$130.00
05/22/2023	Postage	\$0.60
05/23/2023	OTR Legal Process & Courier. Invoice 2023000581. Summons to be served on Nationstar Mortgage LLC c/o Corporation Service Company. 05.23.23	\$131.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000582. Out of State Summons to be served on Loan Acquisition Trust c/o US Bank Trust National Association. Additional addresses, Copies. 05.23.23	\$396.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000584. Summons to be served on Waikiki Trust D/B/A Waikiki Partnership of Daniel and Herlene Lifter Trust Funds c/o CT Corporation System. 5.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000585. Summons to be served on US Bank National Association c/o CT Corporation System. copies. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000587. Summons to be served on Rocket Mortgage F/K/A Quicken Loans c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000588. Summons to be served on New Residential Mortgage LLC c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000589. Summons to be served on JP Morgan Chase Bank c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000590. Summons to be served on Deutsche Bank Trust Co., National Association, As Trustee c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000591. Summons to be served on Countrywide Home Loans Inc. c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000592. Summons to be served on Citi-mortgage Inc. c/o CT Corporation System. 05.23.23	\$61.00
05/23/2023	OTR Legal Process & Courier. Invoice 2023000593. Summons to be served on Bank of America c/o CT Corporation System. 05.23.23	\$61.00
05/24/2023	Postage	\$1.20
05/25/2023	OTR Legal Process & Courier. Invoice 2023000583. Out of state Summons to be served on Aegis Wholesale Corporation, Additional addresses, copies. 05.25.23	\$396.00
05/31/2023	Lexis Nexis Advance Legal Research Fee	\$2.87
05/31/2023	Photocopies	\$443.16

06/01/2023	OTR Legal Process & Courier. Invoice 2023000594. Summons out of State to be served on U.S. Secretary Of Housing and Urban Development c/o Marcia Fudge. Additional address 6.01.23	\$396.00
06/02/2023	Postage	\$0.60
06/19/2023	Postage	\$0.60
06/27/2023	Postage	\$0.60
06/29/2023	Postage	\$0.60
06/30/2023	Lexis Nexis Advance Legal Research Fee	\$8.56
06/30/2023	Accurint Research Fee	\$162.64
06/30/2023	Webmaster. Posting various communications and documents on April, May and June 2023, monthly hosting renewal from May - July 2023.	\$360.60
06/30/2023	Photocopies	\$2.52
		\$7,444.90

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Peter Valori	PFV	76.8	\$550.00	\$41,965.00
Morgan Levine	MJL	76.5	\$350.00	\$26,775.00
Melanie Damian	MME	13.1	\$550.00	\$7,205.00
Omar Garcia	og	110.8	\$120.00	\$11,376.00
Reesea Saetae	rs	37.4	\$100.00	\$3,180.00
Kenneth Murena	KDM	1.4	\$550.00	\$770.00
Jeannette Serna	js	2.9	\$100.00	\$0.00
Joseph Seara	JS	1.5	\$150.00	\$225.00
Daniel Jellema	dj	132.0	\$120.00	\$15,840.00
Lisa Fazzah-Diaz	lfd	1.2	\$100.00	\$0.00
Gabrielle Thomas	gt	1.3	\$150.00	\$195.00

Invoice Amount: \$114,975.90

All Invoices Amount: \$114,975.90

Amount Applied: \$0.00

Balance Due: \$114,975.90



CLICK TO PAY

Visit: <https://rapidpay.us>
Ref: **220107389615**

Payments Since Last Invoice

Date	Description	Amount
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Composite Exhibit 2

Sacher Zelman Hartman, P.A.
Two Datran Center, Suite 2000
9130 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 371-8797
E-mail: info@sacherzelman.com
ID#: 65-0212052

David M. Gersten, Esq.
Gordon & Rees, LLP
100 SE 2nd Street, Suite 3900
Miami, Florida 33131

June 25, 2023
Invoice Number 112972

FILE: 3110002 Gersten, David M. as Receiver
for New World Condominium Apartments
Condominium Association

PROFESSIONAL SERVICES

			Hours
05/02/23	RMZ	Review Complaint, Order Appointing Receiver; telephone call with Fidelity National Title Company; review Declaration of Condominium; review Title Notes; telephone call with Peter Valori, Esq.	1.80
05/03/23	RMZ	Preparation of Memorandum concerning title insurance to Fidelity Title Insurance; review 718.711 F.S.	0.50
05/03/23	RMZ	Telephone call with Karla Staker of Fidelity National Title Insurance Company	0.20
05/04/23	RMZ	Review correspondence from Karla Staker of Fidelity National Title Insurance Company.	0.30

3110002 Gersten, David M. as Receiver for New World Condominium Apartments Cond

05/05/23	RMZ	Review Memorandum from Karla Staker; review 1995 ed of FS 718.117; telephone conference with Karla Staker of Fidelity National Title Insurance Company.	0.90
05/08/23	RMZ	Review Condominium Declaration; telephone call with Karla Staker of Fidelity National Title Insurance Company; telephone conference with Al Gomez, Esq. of Fidelity National Title Insurance Company; calls to Peter Valori, Esq; telephone conference with Peter Valori, Esq.	2.60
05/09/23	RMZ	Telephone call with Rebecca Wood, Esq. of Old Republic Title Insurance Company; telephone call with Brian Stringer of the Fund	0.70
05/09/23	RMZ	Review 1995 statutory provisions, telephone call with Peter Valori, Esq.	0.40
05/11/23	RMZ	Telephone call with Peter Valori, Esq.	0.30
05/12/23	RMZ	Telephone call with Al Gomez, Esq. of Fidelity National Title Insurance Company; telephone call with Cheryl Lieberman of Fidelity National Title Insurance Company; Telephone call with Patrick Hand; telephone call with Peter Valori, Esq; review Fund Notes regarding Homestead and Judgment creditors.	1.80
05/13/23	RMZ	Telephone call with Peter Valori, Esq; prepare Memo to David Gersten, Esq.	0.70

3110002 Gersten, David M. as Receiver for New World Condominium Apartments Cond

05/16/23	RMZ	Review and revise Memorandum to David Gersten; telephone call with Patrick Hand; review Memo From Peter Valori, Esq.	0.60
05/17/23	RMZ	Telephone call with Karla Staker, Esq. of Fidelity National Title regarding homestead/judgment attachments; telephone call with David Gersten, Esq.	0.70
05/18/23	RMZ	Telephone call with Evelyn Garcia of The Fund.	0.30
06/19/23	DGB	Review title commitment	0.90
06/20/23	RMZ	Telephone call with David Gersten; telephone call with Peter Valori, Esq; conference with Iris Castillo regarding title commitment requirements.	0.50
06/21/23	DGB	Conference with Richard M. Zelman regarding commitment requirements file	1.30
06/21/23	RMZ	Telephone call with Jennifer Mann of Attorney's Title Insurance company regarding revised title commitment; review title requirement corrective procedures.	0.80
06/22/23	RMZ	Telephone call with Jennifer Mann of Attorneys Title regarding title requirements and exceptions; review all title requirements.	2.40
06/23/23	RMZ	Telephone call with David Gersten and Peter Valori, Esq.	0.90

June 25, 2023
Invoice 112972

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3110002 Gersten, David M. as Receiver for New World Condominium Apartments Cond

TOTAL HOURS AND FEES 18.60 8,723.00

DISBURSEMENTS

06/25/23 The Fund - Commitment Fee 2,500.00

TOTAL COST 2,500.00

TOTAL STATEMENT 11,223.00

Fee Summary

Hours

Amount

Dominique Brown 2.20 605.00

Richard M. Zelman 16.40 8,118.00

Total Fees 18.60 8,723.00

NEW BALANCE

11,223.00

Sacher Zelman Hartman, P.A.
Two Datran Center, Suite 2000
9130 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 371-8797
E-mail: info@sacherzelman.com
ID#: 65-0212052

David M. Gersten, Esq.
Gordon & Rees, LLP
100 SE 2nd Street, Suite 3900
Miami, Florida 33131

July 25, 2023
Invoice Number 113013

FILE: 3110002 Gersten, David M. as Receiver
for New World Condominium Apartments
Condominium Association

PROFESSIONAL SERVICES

Hours

06/27/23	DGB	Review revised title commitment	0.70
07/07/23	RMZ	Telephone call with Iris Castillo and Dominique Brown, Esq. regarding clearing title requirements.	0.40
07/07/23	IC	Telephone conference call with Richard Zelman and Dominique Brown regarding title requirements; review title commitment.	0.90
07/10/23	RMZ	Review title commitment; conference with Iris Castillo regarding non-identity Affidavits; correspondence to Peter Valori, Esq. regarding roof dispute; telephone call with Peter Valori, Esq.	0.20
07/11/23	IC	Review open Mortgages; file organization.	1.50

3110002 Gersten, David M. as Receiver for New World Condominium Apartments Cond

07/12/23	RMZ	Review County liens; telephone call with Iris Castillo and Dominique Brown regarding title requirements; correspondence to/from David Gersten and Peter Valori.	0.80
07/12/23	IC	Review County liens; telephone call with Richard Zelman and Dominique Brown.	0.20
07/13/23	RMZ	Telephone call with Dominique Brown regarding County liens; prepare correspondence to David Gersten and Peter Valori regarding mortgage satisfactions; telephone call with Iris Castillo.	0.50
07/13/23	IC	Review open Mortgages; preparation of Open Mortgage list.	1.00
07/14/23	RMZ	Telephone call with Dominique Brown regarding requirement number 27; telephone call with Iris Castillo; prepare correspondence to David and Peter; review item 36.	0.70
07/14/23	IC	Telephone call with Richard Zelman and Dominique Brown regarding requirement numbers 27 and 36.	0.40
07/18/23	RMZ	Telephone call with Peter Valori, Esq; conference with Iris Castillo; review correspondence from David Gersten; telephone call with Dominique Brown, Esq.	0.40
07/18/23	IC	Telephone call with Richard M. Zelman.	0.60

3110002 Gersten, David M. as Receiver for New World Condominium Apartments Cond

07/24/23	RMZ	Review title requirements 36-78; telephone call with Iris Castillo regarding Non-Identity Affidavits.	0.90	
07/24/23	IC	Review files; file organization.	2.50	
07/25/23	RMZ	Telephone call with Iris Castillo regarding Non-ID Affidavits, loan and judgment payment amount certifications.	0.30	
07/25/23	IC	Telephone call with Richard M. Zelman regarding Affidavits, judgment and payoffs.	0.20	

TOTAL HOURS AND FEES 12.20 3,184.00

TOTAL STATEMENT 3,184.00

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Dominique Brown	0.70	192.50
Richard M. Zelman	4.20	2,079.00
Iris Castillo	7.30	912.50
Total Fees	12.20	3,184.00

06/25/23	PREVIOUS BALANCE	11,223.00
	TOTAL STATEMENT	3,184.00
	<u>NEW BALANCE</u>	<u>14,407.00</u>

Accounts Receivable Aging

Current	3,184.00
30 Days	11,223.00
60 Days	0.00
90 Days	0.00
120 Days	0.00

Exhibit 3

IN THE CIRCUIT COURT FOR THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

LOUIS JEAN BAPTISTE, CARDINAL
ANDREWS, and VALERIE HUNTER,
for the use and benefit of other property
owners within New World Condominium
Apartments Condominium Association, Inc.,

CASE NO. 2023-001716-CA-01

SECTION: CA-11

Plaintiffs,

v.

NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM
ASSOCIATION, INC.,

Defendant.

**[PROPOSED] ORDER GRANTING RECEIVER'S APPLICATION
FOR ORDER AUTHORIZING PAYMENT OF FEES AND
EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE FUNDS**

This matter came before the Court upon the application of the Honorable David M. Gersten (Ret.) as the court-appointed receiver in the above-captioned action (the "Receiver") for authorization to pay interim professional fees and expenses of the Receiver and his professionals (the "Application") pursuant to the Court's February 7, 2023 Order Appointing Receiver. With the Court having reviewed the Application, noting that no objection has been filed or otherwise asserted, and finding good cause to approve and authorize payment of the requested fees and costs, hereby ORDERS as follows:

1. The Receiver's Application is GRANTED.
2. The fees and costs incurred by the Receiver and his professionals for the work they performed fulfilling the Receiver's duties under the Appointment Order, reduced by the Receiver as set forth below, are hereby approved in the following amounts:

(a) The Receiver and his law firm, Gordon Rees Scully Mansukhani LLP, incurred fees

in the total amount of \$23,995.00 (after being reduced as set forth in the Application) for the period from April 1, 2023 through June 30, 2023;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver incurred fees in the amount of \$107,531.00 and costs in the amount of \$7,444.90, for a total of \$114,975.90 (after being reduced as set forth in the Application) for the period from April 1, 2023 through June 30, 2023; and

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver: Fees in the amount of \$11,907.00 and costs in the amount of \$2,500.00, for a total of \$14,407.00 (after being reduced as set forth in the Application) for the period from May 2, 2023 through July 31, 2023.

3. The Receiver is authorized to use funds in account(s) of the New World Condominium Apartments Condominium Association, Inc. to pay the fees and costs in Paragraph 2(c), *supra*, and the remaining fees and costs referenced in Paragraphs 2(a)-(b), *supra*, will be deferred to a later date.

DONE AND ORDERED in Miami, Florida, this ____ day of August, 2023.

CIRCUIT COURT JUDGE

Copies to all Counsel of Record