

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 PRELIMINARY REPORT AND APPLICATION FOR ORDER
AUTHORIZING PAYMENT OF FEES AND EXPENSES AND FOR AUTHORIZATION
TO DISTRIBUTE FUNDS PURSUANT TO THE APPOINTMENT ORDER**

The Hon. David M. Gersten (Ret.), the court-appointed Receiver (the "Receiver") in the above-captioned action, submits his initial report regarding the above-referenced matter, together with his request for authorization of interim professional fees and expenses for the period from February 7, 2023 through March 31, 2023.

RECEIVER'S PRELIMINARY REPORT

I. Introduction.

The Receiver was appointed following a catastrophic fire which caused the entire 75-unit condominium known as New World Condominium Apartments located at 395 N.W. 177th Street Miami, Florida 33169 (the "Condominium Property") managed by New World Condominium Apartments Condominium Association, Inc. (the "Association") to be declared an unsafe structure by the Building Official for the City of Miami Gardens. Since his appointment, the Receiver has

worked diligently with his professionals to take custody of the Condominium Property and operate to the extent possible the Association for the benefit of the Association, as well as the unit owners of the Condominium Property and the Association's creditors. The Receiver is working on identifying and reviewing all known assets and records of the Association, including without limitation funds held in a bank accounts, bank records, and files belonging to the Association. Specifically, the Receiver has taken over the Association, including management of post-fire operations of the Association, has taken exclusive control of the Association's bank account, and has opened a fiduciary account for the Receivership Estate.

II. The Appointment and Duties of the Receiver.

On February 1, 2023, the Plaintiffs filed their Emergency Verified Petition for Appointment of Receiver and for Injunctive Relief and their Emergency Verified Motion for Appointment of Receiver in this case. On February 7, 2023, the Court appointed retired Judge David M. Gersten as Receiver over the Association, "including all of its tangible assets, real estate [*i.e.* the Condominium Property], receivables, and financial accounts," *see* Order Appointing Receiver, at pg. 2, upon finding that the Association's neglect and inaction resulted in the Association's near-total destruction. *See id.* at pg. 1, ¶ 3.

The Receiver's mandate was to, *inter alia*, take possession of the Condominium Property and other assets of the Association, assess its business operations, collect its debts, collect assessments from condominium owners (if necessary), levy special assessments from the condominium owners (if necessary), and liquidate the Association's property and assets, including the Condominium Property, as necessary to fulfill the purpose of the Order Appointing Receiver. *See id.* at pg. 2. And, the Receiver was granted wide discretion and authority under the Order Appointing Receiver, including, *inter alia*, the Receiver's duty/power to "[e]xercise all powers as

are conferred upon the officers and directors of the Corporation under law and the declaration, articles, and bylaws of the ASSOCIATION. . . .” *Id.* at ¶ B(4).

The Receiver, through his counsel, provided the statutory notice of the commencement of the Receivership pursuant to section 718.127, Florida Statutes on February 10, 2023.

III. The Receiver’s Activities and Efforts to Date.

A. Employment of Professionals.

Immediately upon his appointment and review of relevant documents, the Receiver determined a present and imminent need to employ certain professionals to assist him in carrying out his duties and responsibilities under the Order Appointing Receiver, which provides that the Receiver has the power and/or duty to “Hire and/or discharge any agents, professionals, including attorneys’ and accountants or employees, property managers or others as necessary for proper administration of the receivership.” *See* Order Appointing Receiver, at ¶ B(15).

Accordingly, the Receiver engaged Damian | Valori | Culmo as his lead counsel (“Lead Counsel”) pursuant, in part, to the Order Appointing Receiver, which provides that the Receiver shall “[e]xercise all powers . . . together with Counsel Melanie Damian.” *See* Order Appointing Receiver, at ¶ B(4). And, the Receiver engaged HSM Consulting, Inc. to conduct an independent forensic fire investigation (“Private Fire Investigator”). The Receiver has made a claim based upon the findings of the Private Fire Investigator.

The Receiver also engaged a fencing company to construct a safety barrier around certain units following consultation and approval by the Building Official for the City of Miami Gardens. The fence was erected to allow a first group of residents to have supervised access to certain less-damaged units for the purpose of retrieving personal items only after the safety barrier was erected. And, after the safety barrier was erected, the Building Official authorized certain residents to

retrieve personal items from their units, and such authorized residents, beginning on March 2, 2023, arrived on the Condominium Property to safely retrieve their personal belongings. Some of those residents are still in the process of retrieving their personal items.

The Receiver also engaged outside counsel, an experienced community association attorney, Jesmany Jomarrón, Esq., and the law firm, The Morgan Law Group, regarding a specific issue related to the condominium documents and condominium related matters (collectively, “Special Counsel”). Special Counsel prepared and provided an opinion letter regarding the issue of untenantability such that the Receiver could take the required and appropriate action under the Declaration of Condominium related to the termination of the Association.

The Receiver also engaged Vanguard Construction Group to conduct an estimate of potential costs to repair the Condominium Property (the “Estimator”) as necessary to educate all unit owners in the event that 70% of the unit owners provided written notice of their choice to repair the Condominium Property pursuant to section 12.8 of the Declaration of Condominium. In addition, the Receiver retained 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 “Appraiser”) in the event that 70% of the unit owners did not provide written notice of their choice to repair the Condominium Property. The Estimator and Appraiser both conducted inspections of the Condominium Property. The Estimator determined that the total amount of the estimated costs to repair the Condominium Property is \$7,845,165.25. And, the Appraiser determined that the market value of the Condominium Property premised upon the foregoing hypothetical condition as a fee simple estate, as of March 14, 2023, was \$14,600,000.00.

The foregoing professionals have been instrumental to the Receiver's evaluation of the Condominium Property and the Association's rights and obligations. On an interim basis, the Receiver's team has been essential to securing the Condominium Property, 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.

Following his appointment, the Receiver and his professionals obtained and reviewed certain key documents of the Association to identify and investigate the Association's assets and liabilities and determine the value (or estimated value) of the Receivership Estate.

The Receiver, through Lead Counsel, issued a demand letter to Truist Bank requesting, *inter alia*, that it provide the Receiver with exclusive control over the Association's sole bank account pursuant to the Order Appointing Receiver. The Receiver issued a similar demand letter to Prestige Management Solutions, Inc. (the "Property Manager"), which enclosed a copy of the Order Appointing Receiver, as well as a request for the Property Manager to produce documents, records, and communications related to or concerning the Association.

Through the foregoing action, the Receiver successfully obtained, *inter alia*, access and control of the Condominium Property, as well as the Association's Truist bank account. The Receiver also received from the Property Manager, *inter alia*, the Association's bank statements from 2021 through 2023, tax returns from 2018 through 2020, budget for the year 2022, proposed

budget for the year 2023, income and expense reports from 2021 through 2023, and statements related to each unit owner's maintenance fees and special assessments.

The Receiver, through Lead Counsel, analyzed the foregoing documents and determined that the Association had approximately \$9,000.00 in its bank account, and that unit owners owe the Association \$364,954.93 in unpaid maintenance fees and special assessments, and that the Association does not have the financial means to pay certain creditors of the Association monies which were owed to them prior to the Receiver's appointment. Such creditors include, but are not limited to, Morandi Engineering and Construction, Inc. for its building occupancy safety inspection rendered from January 30, 2023 through February 2, 2023, Panissa Security for 24-hour security services at the property from January 28, 2023 to present, and the City of Miami Gardens for water bills that had not been paid, among others. As such, the Receiver moved the Court to approve a loan certificate in the amount of \$400,000.00 as necessary to pay the Association's creditors and continue to perform work on Condominium Property as necessary to allow certain unit owners and residents to obtain their belongings from their units, as well as pay, in part, the professionals hired by the Receiver for work performed on the Condominium Property during the course of these proceedings. The Court granted the Receiver's motion on March 28, 2023.

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. More specifically, the Receiver investigated matters concerning 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 garbage removal), and relations with unit owners and residents, among other things.

The Receiver's initial investigation indicated that the Association had not maintained fire insurance or directors' and officers' insurance, and that the Association permitted mismanagement and owed substantial funds to several creditors, including, but not limited to, the City of Miami Gardens for water, the security company for work performed since the January 28, 2023 fire, and the general liability insurer for the premium payment, among others.

The Receiver and his professionals have taken steps to maintain unit owner and resident relations by promptly creating a website (<https://newworldcondoreceivership.com/>), e-mail (newworldreceivership@gmail.com), and direct phone line (786-854-7523) to facilitate communications with unit owners, tenants, creditors, and other interested parties. The Receiver also posted the Order Appointing Receiver to the website on February 7, 2023, thereby providing notice of the Receiver's appointment and authority, and sent such notice to the unit owners by mail pursuant to section 718.127, Florida Statutes.

The Receiver's Lead Counsel 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 five Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer any questions. During the most recent March 27, 2023 Zoom Meeting, the Receiver and Lead Counsel informed the unit owner's more specifically about 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 answered their questions about such section, including the manner in which unit owners could provide written notice of their choice to repair the Condominium Property, and discussed at length that 70% of the unit owners would need to provide written notice of their choice to repair the damaged property in order for such repairs to be made, and that in the

event that 70% of the unit owners did not provide written notice of their choice to repair, the property would be sold. *See* More Information Regarding Termination of the Association, *infra*.

Another meeting is scheduled for April 12, 2023 to discuss the contents of this Preliminary Report, the attachments hereto, and the plan for moving forward as discussed below.

D. Retrieval of Belongings.

As set forth above, once the safety barrier was installed on the Condominium Property, the Building Official for the City of Miami Gardens authorized certain unit owners to retrieve their personal belongings from certain units. Upon receiving such authorization, the Receiver prepared a schedule for those authorized unit owners/residents to retrieve personal belongings from the approved units. The schedule was posted on the above-referenced website. Residents of the select approved units began retrieving their personal items on March 2, 2023 at 9:00 a.m. and continue to retrieve their personal items to date due to many residents needing to reschedule their original time-slot. Residents have also been able to retrieve their vehicles from the property with supervised access from the Building Official, law enforcement, and/or fire department.

Pursuant to the Building Official's February 16, 2023 letter, the Building Official will not authorize the additional residents to retrieve their personal items from units which are presently deemed unsafe to enter until after debris is removed from the more damaged side of the property (behind the safety barrier). As such, following the Court's approval of a loan certificate on March 28, 2023, the Receiver hired a debris removal company for the cost of \$38,807.12. Once the debris is removed, the Building Official will authorize additional unit owners and residents to access their units to retrieve their personal property.

E. Written Notice Required for Repairs.

Section 12.8 of the Declaration of Condominium for the Association provides, in relevant part, the following:

12.8 DETERMINATION TO REPAIR. If any part of the Condominium Property is damaged by casualty the determination as to whether or not it shall be repaired (which term shall include reconstruction) shall be made in the following manner:

....

b. DAMAGE TO UNITS . . . (ii) If the damage is to Units and if the Units to which more than 70% of the Common Elements are appurtenant are found by the Board to be untenable, then the damaged property will not be repaired, and the Condominium will be terminated (without agreement as elsewhere provided), unless within sixty (60) days after the casualty, voting interests representing 70% or more of the Common Elements agree in writing to the repair. . . .

See Declaration of Condominium (Book 17301, Page 1661), at § 12.8(b)(ii).

The Receiver obtained the written opinion of Special Counsel as to the issue of untenability. A copy of Special Counsel’s March 6, 2023 opinion, which states and concludes that the Condominium Property is 100% untenable, is attached hereto as **Exhibit A**. Such opinion was also posted on the above-referenced website.

Based upon the foregoing, the Receiver acting as the Association’s Board of Directors pursuant to the Order Appointing Receiver, found that the Condominium Property is “untenable” pursuant to the Declaration of Condominium. A copy of the Receiver’s findings are set forth in a memorandum, which is attached hereto as **Exhibit B**. Such memorandum was also posted on the above-referenced website.

Thereafter, the Receiver and Lead Counsel held a meeting via Zoom to explain the foregoing opinion and memorandum to unit owners, residents, and other interested parties. The Receiver and Lead Counsel also answered questions regarding such opinion and memorandum

during the meeting, and continued to answer questions regarding same thereafter via phone and email.

Thereafter, a Notice of Meeting of the Members was mailed and emailed to all unit owners and was posted to the above-referenced website. The Notice of Meeting of the Members provided that a meeting would be held on Monday, March 27, 2023, at 6:00 p.m., to inform owners of their right under Article 12.8 of the Declaration to avoid termination of the Condominium if “voting interests representing 70% or more of the Common Elements agree in writing to the repair.” *See* Notice of Meeting of the Members, attached hereto as **Exhibit C**.

During the March 27, 2023 meeting, a majority of the unit owners expressed their desire that the property not be repaired. Thereafter, the Receiver and his Lead Counsel received only two out of seventy-five written notices indicating a choice to repair the Condominium Property.

F. Ongoing Legal Proceedings.

On February 23, 2023, in violation of the stay provision set forth in the Order Appointing Receiver (at ¶ A), a tenant of one of the unit owners, Shekita Whitfield, through her counsel, filed a class action lawsuit against the Property Manager, the Association, and the former board members of the Association (the “Class Action”). The Class Action is prohibited by the Order Appointing Receiver, which provides: “A stay is hereby imposed, prohibiting all persons and entities from commencing [] any litigation against . . .the ASSOCIATION without prior approval of this Court.” *See* Order Appointing Receiver, at p. 2, ¶ A.

The Receiver’s Lead Counsel is in the process of obtaining an agreed voluntary stay or dismissal of the Class Action without prejudice. If that cannot be achieved, the Receiver plans to take appropriate action pursuant to the Order Appointing Receiver.

IV. Plan for Moving Forward.

The debris removal has begun. Once completed, the Receiver will schedule additional residents to begin retrieving their personal items from their units.

Because the “voting interests representing 70% or more of the Common Elements” did not agree in writing to repair the Condominium Property, the Association is, in effect, terminated pursuant to the Declaration of Condominium. As such, the Receiver and Lead Counsel will take appropriate measures pursuant to the Declaration of Condominium and under Florida law, including proceeding with a partition action to convert the Condominium Property into a fee simple estate, and then selling the land pursuant to a separate process approved by this Court.

The Receiver will also continue to investigate other claims which the Association may pursue, as well as defend the Association for the benefit of the unit owners and creditors 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.

V. Conclusion.

The Receiver and his professionals appreciate the opportunity to assist the Court in this matter. While significant efforts have already yielded progress, the Receiver and his professionals will continue their efforts as discussed herein to fulfill the Receiver’s duties under the Court’s Order Appointing Receiver, with the focus on affording the most beneficial and cost-effective solution to the owners and creditors of the Association.

**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, *supra*, to assist in carrying out his duties, and as authorized by the Order Appointing Receiver, the Receiver retained (i) Gordon Rees Scully Mansukhani LLP, his law firm (“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 (ii) outside counsel from an experienced community association attorney, Jesmany Jomarrón, Esq., and the law firm, The Morgan Law Group, regarding a specific issue related to the condominium documents and condominium related matters (collectively, “Special Counsel”). And, in that regard, the Receiver retained the foregoing to assist with the operation of the Association under the Receiver’s supervision.

The fees incurred by GRSM, Lead Counsel, and Special Counsel are reflected on the invoices attached hereto as **Composite Exhibit 1** and reflect the time entries and work performed by the Receiver and his professionals for the benefit of the Association during the Application Period (February 7, 2023 through March 31, 2023), as well as the Receiver’s reductions thereto.

As reflected in **Composite Exhibit 1**, during the Application Period: (i) GRSM has incurred fees in the total amount of \$32,860.00; (ii) Lead Counsel has incurred fees in the amount of \$143,976.00, and costs in the amount of \$1,070.54, which the Receiver reduced by five percent (5%), for a total of \$137,794.21; and (iii) Special Counsel has incurred fees in the total amount of \$9,020.00.¹

¹ 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.

The Receiver seeks approval and authorization for payment of all such fees and costs (at the reduced amounts), which total \$170,559.21. A proposed order is attached hereto as **Exhibit 2**.

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/or 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 that the Court enter an order approving and authorizing payment of fees and costs to GRSM in the amount of \$32,860.00, to Lead Counsel in the amount of \$137,794.21, and to Special Counsel in the amount of \$9,020.00 incurred during the application period (February 7, 2023 through March 31, 2023), and granting such further relief as the Court deems just and proper.

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI LLP

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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 12th day of April, 2023.

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

The Morgan Law Group, P.A.

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Main Office: 55 Merrick Way, Suite 404 | Coral Gables, FL 33134

Florida | Louisiana | Mississippi | California



March 6, 2023

Via E-mail Only

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Miami, Florida 33131
pvalori@dvlip.com

Re: *Legal Opinion on Untenantable Condominium Units*

Dear Peter:

This in response to your request for an opinion letter regarding whether New World Condominium Apartments Condominium Association, Inc. ("New World Condo") has become "untenantable" within the context of its Declaration of Condominium.

I am qualified to provide this opinion. I am an attorney licensed to practice law in the State of Florida. In addition, my professional experience makes me uniquely qualified to provide this legal opinion. I have focused my practice on community association law for over thirteen (13) years. During this time, I have become familiar with legal issues uniquely applicable to condominium associations.

We discussed that New World Condo is under a receivership, that Judge David M. Gersten (Ret.) is the court-appointed receiver, and that the City of Miami Gardens declared New World Condo an unsafe structure as a result of a fire. I studied the Declaration of New World Condo and quoted the relevant portion below. I reviewed public records relevant to New World Condo including recorded governing documents, secretary of state filings, and public dockets. I reviewed applicable statutes including Chapter 718 (Florida Condominium Act) and Chapter 83 (Florida Landlord and Tenant Act). I examined the satellite imagery of the Condominium Property before the fire and news coverage of the aftermath. The news depicted images of New World Condo in a destroyed state after the fire. Based on the foregoing, and the following applicable law, I believe New World Condo is 100% "untenantable" within the meaning of its Declaration.

Article 12.8 of the Declaration of New World Condo provides in relevant part (emphasis added):

12.8 DETERMINATION TO REPAIR. If any part of the Condominium Property is damaged by casualty the determination as to whether or not it shall be repaired (which term shall include reconstruction) shall be made in the following manner:

....

b. DAMAGE TO UNIT.

....

(ii) If the damage is to Units and if the Units to which more than 70% of the Common Elements are appurtenant are found by the Board to be **untenantable**, then the damaged property will not be repaired, and the Condominium will be terminated (without agreement as elsewhere provided), unless within sixty (60) days after the casualty, voting interests representing 70% or more of the Common Elements agree in writing to the repair.

(New World Condo. Dec. at Book 17301, p. 1661, August 2, 1996.) The term “untenantable” appears only once in Section 12.8(b)(ii) of the Declaration. Specifically, it appears in the context of the Board’s finding of damage to the Condominium Property after a casualty such as a fire.

Untenantable refers to a situation where property cannot be used or occupied. In this case, New World Condo was damaged by a fire resulting in the City of Miami Gardens declaring that 100% of New World Condominium Property is an “unsafe structure.” All occupants had to vacate the premises and cannot return.

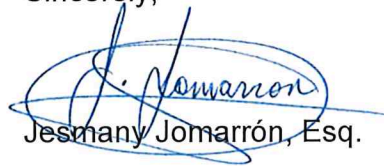
Unsafe structures in Miami-Dade County, Florida, are governed by Section 8-5 of the Florida Building Code. An unsafe structure is defined as creating a danger to the health and safety of the citizens. An unsafe structure includes buildings that have been substantially damaged by fire or that are vacant, unguarded, and open at doors or windows. New World Condo meets the Florida Building Code’s definition of “unsafe structure.”

New World Condo. Apts. Condo. Ass'n, Inc.
Legal Opinion on Untenantable Condominium Units
March 6, 2023

The City of Miami Garden's declaration that 100% of New World Condo is an "unsafe structure" prevents all use or occupancy of the Condominium Property by its owners. As a result, New World Condo is 100% untenable within the context of Section 12.8(b)(ii) of the Declaration.

Should you have any other questions, please do not hesitate to contact me.

Sincerely,



Jesmany Jomarrón, Esq.

Memorandum

From: Judge David Gersten (ret.)
To: Association Membership – New World Condominium Apartments
Condominium Association, Inc.
Date: March 6, 2023
Re: New World Condominium Apartments Condominium Association, Inc. -
Finding of Untenantability and Implementation of Declaration

Article 12.8 of the Declaration of the New World Condominium Apartments Condominium Association, Inc. ("New World Condo") provides in relevant part:

12.8 DETERMINATION TO REPAIR. If any part of the Condominium Property is damaged by casualty the determination as to whether or not it shall be repaired (which term shall include reconstruction) shall be made in the following manner:

. . . .

b. DAMAGE TO UNITS. . . . (ii) If the damage is to Units and if the Units to which more than 70% of the Common Elements are appurtenant are found by the Board to be untenable, then the damaged property will not be repaired, and the Condominium will be terminated (without agreement as elsewhere provided), unless within sixty (60) days after the casualty, voting interests representing 70% or more of the Common Elements agree in writing to the repair. . . .

See New World Condo Declaration, at Book 17301, Page1661, August 2, 1996.

The Receiver has obtained an opinion of counsel as to the issue of untenability which states that the New World Condo property is 100% untenable. See attached March 6, 2023 Opinion.

The Opinion states and concludes that:

The term "untenantable" appears only once in Section 12.8(b)(ii) of the Declaration. Specifically, it appears in the context of the Board's finding of damage to the Condominium Property after a casualty such as a fire. Untenantable refers to a situation where property cannot be used or occupied. In this case, New World Condo was damaged by a fire resulting in the City of Miami Gardens declaring that 100% of New World Condominium Property is an "unsafe structure." All occupants had to vacate the premises and cannot return. Unsafe structures in Miami-Dade County, Florida, are governed by Section 8-5 of the Florida Building Code. An unsafe structure is defined as creating a danger to the health and safety of

the citizens. An unsafe structure includes buildings that have been substantially damaged by fire or that are vacant, unguarded, and open at doors or windows. New World Condo meets the Florida Building Code's definition of "unsafe structure."

The City of Miami Garden's declaration that 100% of New World Condo is an "unsafe structure" prevents all use or occupancy of the Condominium Property by its owners. As a result, New World Condo is 100% untenable within the context of Section 12.8(b)(ii) of the Declaration.

Based upon the foregoing, the Receiver acting as the Board pursuant to the Court's February 7, 2023 Order, hereby finds that the "Condominium Property" as defined by the Declaration is untenable pursuant to the condominium documents.

The Association will schedule a meeting of the Membership of the Association. A written vote by electronic means or otherwise will be taken to determine whether the "voting interests representing 70% or more of the Common Elements agree in writing to the repair."

If 70% of the voting interests vote to repair, then the Receiver will take appropriate steps including making special assessments upon the unit owners as needed to complete such repairs.

If 70% do not vote in favor of making repairs, the Receiver will take appropriate measures pursuant to the Declaration and under Florida law.

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March 6, 2023

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This in response to your request for an opinion letter regarding whether New World Condominium Apartments Condominium Association, Inc. ("New World Condo") has become "untenantable" within the context of its Declaration of Condominium.

I am qualified to provide this opinion. I am an attorney licensed to practice law in the State of Florida. In addition, my professional experience makes me uniquely qualified to provide this legal opinion. I have focused my practice on community association law for over thirteen (13) years. During this time, I have become familiar with legal issues uniquely applicable to condominium associations.

We discussed that New World Condo is under a receivership, that Judge David M. Gersten (Ret.) is the court-appointed receiver, and that the City of Miami Gardens declared New World Condo an unsafe structure as a result of a fire. I studied the Declaration of New World Condo and quoted the relevant portion below. I reviewed public records relevant to New World Condo including recorded governing documents, secretary of state filings, and public dockets. I reviewed applicable statutes including Chapter 718 (Florida Condominium Act) and Chapter 83 (Florida Landlord and Tenant Act). I examined the satellite imagery of the Condominium Property before the fire and news coverage of the aftermath. The news depicted images of New World Condo in a destroyed state after the fire. Based on the foregoing, and the following applicable law, I believe New World Condo is 100% "untenantable" within the meaning of its Declaration.

Article 12.8 of the Declaration of New World Condo provides in relevant part (emphasis added):

12.8 DETERMINATION TO REPAIR. If any part of the Condominium Property is damaged by casualty the determination as to whether or not it shall be repaired (which term shall include reconstruction) shall be made in the following manner:

....

b. DAMAGE TO UNIT.

....

(ii) If the damage is to Units and if the Units to which more than 70% of the Common Elements are appurtenant are found by the Board to be **untenantable**, then the damaged property will not be repaired, and the Condominium will be terminated (without agreement as elsewhere provided), unless within sixty (60) days after the casualty, voting interests representing 70% or more of the Common Elements agree in writing to the repair.

(New World Condo. Dec. at Book 17301, p. 1661, August 2, 1996.) The term "untenantable" appears only once in Section 12.8(b)(ii) of the Declaration. Specifically, it appears in the context of the Board's finding of damage to the Condominium Property after a casualty such as a fire.

Untenantable refers to a situation where property cannot be used or occupied. In this case, New World Condo was damaged by a fire resulting in the City of Miami Gardens declaring that 100% of New World Condominium Property is an "unsafe structure." All occupants had to vacate the premises and cannot return.

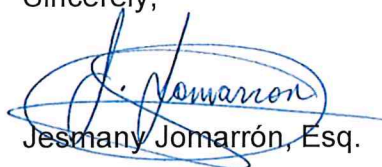
Unsafe structures in Miami-Dade County, Florida, are governed by Section 8-5 of the Florida Building Code. An unsafe structure is defined as creating a danger to the health and safety of the citizens. An unsafe structure includes buildings that have been substantially damaged by fire or that are vacant, unguarded, and open at doors or windows. New World Condo meets the Florida Building Code's definition of "unsafe structure."

New World Condo. Apts. Condo. Ass'n, Inc.
Legal Opinion on Untenantable Condominium Units
March 6, 2023

The City of Miami Garden's declaration that 100% of New World Condo is an "unsafe structure" prevents all use or occupancy of the Condominium Property by its owners. As a result, New World Condo is 100% untenable within the context of Section 12.8(b)(ii) of the Declaration.

Should you have any other questions, please do not hesitate to contact me.

Sincerely,



Jesmany Jomarrón, Esq.

NOTICE OF MEETING OF THE MEMBERS

NEW WORLD CONDOMINIUM APARTMENTS CONDOMINIUM ASSOCIATION, INC.

To All Members:

On Monday, March 27, 2023, at 6:00p.m., a Meeting of the Members of New World Condominium Apartments Condominium Association, Inc. will be held to inform owners of their right under Article 12.8 of the Declaration to avoid termination of the Condominium if “voting interests representing 70% or more of the Common Elements agree in writing to the repair.”

This meeting will be held by Zoom live streaming:

Topic: New World - Meeting

Time: Mar 27, 2023 06:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://us02web.zoom.us/j/81172148056?pwd=Vk1NQmRiWC9YcU9kVndzK3IxOFQ2QT09>

Meeting ID: 811 7214 8056

Passcode: 979969

Agenda

1. Proof of notice of meeting
2. Report of Receiver
3. Adjournment

**BY ORDER OF THE RECEIVER
NEW WORLD CONDOMINIUM APARTMENTS
CONDOMINIUM ASSOCIATION, INC.**

EXHIBIT C

GORDON&REES
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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

March 31, 2023
ID: GERSP 1299620
Invoice No. 21299696
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 28, 2023

Fees For Professional Services:	\$13,745.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$13,745.00

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.

COMPOSITE EXHIBIT 1

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
02/03/23	Conference with Raul Gastesi and Melanie Damian re: order .2; and review and respond to Melanie Damian email re: proposed order re: review and discuss with Melanie Damian .2	DMG2	0.40
02/08/23	Strategic initial discussion with Melanie Damian re: steps going forward and follow-up tomorrow .1	DMG2	0.10
02/09/23	Review and respond to Melanie Damian email re: new website .1; conference with Melanie Damian and Eric Thompson re: issues to be addressed as soon as possible .3; review and respond to Melanie Damian email re: fire inspection set for next Wednesday .1; and review and respond to request to sign oath of receiver .1	DMG2	0.60
02/09/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq. and Peter Valori, Esq.) to discuss strategy going forward	ERT	0.30
02/10/23	Review emails between Peter Valori and management company re: documents .1; review emails between Peter Valori and New World re: bank account information .1; review and respond to Melanie Damian email re: open City National Bank account .1; review and respond to Peter Valori email re: details .1; conference with Melanie Damian re: current status of known information .2; review email from Reese Setae re: bank .1; review and respond to Melanie Damian and Peter Valori email re: information on reaching owners .1; review email from Truist bank .1; review and respond to Peter Valori email re: Trust Bank .1; and review and respond to Peter Valori email containing updated information re: roofer .1	DMG2	1.10
02/13/23	Review Denise Brooks email re: access to units .1; conference with Miami Gardens city manager office re: set up meeting .2; review and respond to Melanie Damian email re: call .1; review and respond to Melanie Damian emails re: zoom meeting with Craig Clay .1; review and respond to A Williams re: revised zoom meeting time .1; review and respond to Peter Valori email re: new issues .1; and review and respond to A. Williams need to cancel and reschedule meeting .1	DMG2	0.80
02/14/23	Conference with Craig Clay, Deputy City Manager re: fire and steps going forward .2; review and respond to Melanie Damian email re: conference .1; review and respond to Peter Valori email re: updated information .1; review and respond to Peter Valori email re: engineer report .2; review and respond to Peter Valori email re: pictures of fire	DMG2	1.00

	and review many pictures .2; review and respond to Peter Valori email re: site visit .1; and review and respond to Peter Valori email re: Mayor communication .1		
02/15/23	Review and respond to Peter Valori email re: Mayor and today's meeting .1; zoom conference with Craig Clay, Ozzie Diaz, Melanie Damian, Eric Thompson re: steps going forward for homeowners/renters .6; and review and respond to Morgan Levine email with dropbox and pertinent information .1	DMG2	0.80
02/15/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.), Craig Clay (Deputy City Manager, Miami Gardens), and Ozzie Diaz (Building Official, Miami Lakes) to discuss action items and strategy going forward	ERT	0.70
02/16/23	Review and respond to Peter Valori email re: round up .1; review and respond to homeowner voicemail and end to Morgan Levine .1; review and respond to Peter Valori email re: today's meeting .1; review and respond to Melamie Damian email with lists of approved companies .1; conference with Peter Valori, Melanie Damian, Eric Thompson, Morgan Levine and Joe Setae re: steps going forward .8; review Peter Valori email re: letter to Ozzie Diaz .1; review Peter Valori/Ozzie Diaz email re: entry .1; review Morgan Levine email .1; review Peter Valori email to Ozzie Diaz re: plan for entry .1; and review Gabriel Calero email re: Truist Bank .1	DMG2	1.70
02/16/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Melanie Damian, Esq and Peter Valori, Esq.) to discuss action items and strategy going forward	ERT	0.80
02/17/23	Review and respond to Peter Valori email re: contacts .1; review Morgan Levine email to Gabriel Calero .1; and review email exchange between Morgan Levine and Gabriel Calero re: Truist Bank .1	DMG2	0.30
02/21/23	Review and respond to multiple Peter Valori emails re: New World status including: build or demolish, fencing, dues in arrearages and upcoming zoom .2; review and respond to Melanie Damian email re" FAQ's .2; review next draft of FAQ's for posting on website .1; email to Peter Valori re: zoom meeting with Clay Craig .1; review and respond to Olivia email re: zoom meeting tomorrow .1; and attend 1st New World zoom with homeowners 2.3	DMG2	3.00
02/21/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss action items and strategy going forward	ERT	2.30
02/22/23	Review and respond to Peter Valori email re: declaration .1; and review	DMG2	0.20

and respond to Peter Valori email re: real estate lawyer .1

02/23/23	Review and respond to email from Clay Craig re: zoom .1; review and respond to email from Reese Saetae re: weekly zoom meetings .1; review and respond to email from Peter Valori re: debris removal .1; review and respond to email(s) from Peter Valori re: multiple issue updates and review updates .2; review and respond to Peter Valori email re: 12.8 and debris/fence issues .1; review and respond to Peter Valori email re: electrical work and other required work .1; conference with Peter Valori and Melanie Damian re: options .2; and review and respond to Peter Valori email re: fence quote .1	DMG2	1.00
02/24/23	View the property along with Ozzie Diaz and Peter Valori to determine entry for residents and consider whether safe and practical for possible partial occupancy 2.0; and review information form for resident use going forward .1	DMG2	2.10
02/27/23	Conference with Peter Valori re: steps going forward on many fronts including documents, funding, habitability, construction costs and zoning .8; review and respond to Melanie Damian email re: Jesmany Jomarron .1; legal team conference re: steps going forward re: what options for building exist 1.2; and review and forward email from Reesea Setae re: future conferences .1	DMG2	2.20
02/27/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq. and, for a portion of the meeting, Melanie Damian, Esq.), and Jesmany Jomarron, Esq. to discuss action items and strategy going forward	ERT	1.20
02/28/23	Review and respond to Peter Valori email re: fire inspection report .1; and review email with Peter Valori's proposed schedule for retrieving property .1	DMG2	0.20

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	15.50	11,625.00
ERT	Eric Thompson	Partner	400.00	5.30	2,120.00

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 21299696

March 31, 2023
Page 5

TOTAL FOR SERVICES

\$13,745.00

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David Gersten
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Miami, FL 33131
dgersten@grsm.com

March 31, 2023
ID: GERSP 1299620
Invoice No. 21299696
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 28, 2023

Fees For Professional Services:	\$13,745.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$13,745.00

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: 21299696

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

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

April 7, 2023
ID: GERSP 1299620
Invoice No. 21302964
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2023

Fees For Professional Services:	\$19,115.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$19,115.00

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>
03/01/23	Review and respond to Peter Valori email re: Whitfield class action and review complaint .2; review and respond to Peter Valori email re: judge .1; review and respond to Melanie Damian email re: management agreement and review agreement .2; conference with Melanie Damian, Peter Valori and Eric Thompson re: class action case .4; and zoom meeting with unit owners and tenants 2.3	DMG2	3.20
03/01/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss action items and strategy going forward	ERT	2.40
03/01/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Melanie Damian, Esq and Peter Valori, Esq.) to discuss action items and strategy going forward	ERT	0.40
03/02/23	Review and respond to Peter Valori email re: request to hire forensic fire investigator .1; review and respond to Kalif email re: purchase of building .2; review and respond to Peter Valori email re: content removal .1; review and respond to Melanie Damian and Peter Valori email re: partition .1; review Peter Valori email with statute re: partition .2; review and respond to Peter Valori and Melanie Damian emails re: magistrate .1; review and respond to Peter Valori email re: fire inspection .1; and review Peter Valori email with fire repost and examine report .2	DMG2	1.10
03/03/23	Conference with Melanie Damian re: receivers certificate and offers .2	DMG2	0.20
03/06/23	Review lawyer's letter re: untenability .1; review and respond to Kalif Fagan email re: property .1; review and respond to Ken Murean email re: insurance .1; review and respond to Peter Valori email re: team round-up .1; review and respond to Peter Valori email re: debris removal and demolition .1; review Melanie Damian email to Kalif Fagan re: interest in property .1; review and forward Kalif Fagan email to Melanie re: interest in property .1; and review and respond to Ken Murena email re: Houston Insurance Co. .1	DMG2	0.80
03/06/23	Attend (remotely, via Zoom) meeting with independent counsel (Peter Valori, Esq.) to discuss action items and strategy going forward	ERT	0.60
03/07/23	Review and respond to Peter Valori email re: opinion letter .1; and review and respond to lengthy Peter Valori email re: independent fire inspection .1	DMG2	0.20

03/08/23	Legal team zoom meeting re: all pending issues 1.4; and attend zoom meeting with unit owners and legal team 1.2	DMG2	2.60
03/08/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Melanie Damian, Esq. and Peter Valori, Esq.) to discuss action items and strategy going forward	ERT	1.20
03/08/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss action items and strategy going forward	ERT	1.70
03/09/23	Review emails between Kalif Fagan and Melanie Damian re: property .1	DMG2	0.10
03/10/23	Review and respond to Peter Valori email re: appraisal and adjuster	DMG2	0.10
03/10/23	Analyze the Association's 7/2/22-7/2/23 General Liability Policy, 77 pages, in furtherance of evaluating potential covered claims under that Policy	ERT	0.90
03/10/23	Begin to analyze the Association's 7/2/22-7/2/23 Commercial Umbrella Liability Policy, 53 pages, in furtherance of evaluating potential covered claims under that Policy	ERT	0.30
03/11/23	Review and respond to Peter Valori email with appraisal agreement	DMG2	0.10
03/12/23	Review string email from legal team re: notice .2; and review Jesmany and Peter Valori email re: posting on website .1	DMG2	0.30
03/13/23	Conference with Peter Valori and Melanie Damian re: pending issue re: appraisal, bank lending, potential law suits and construction issues/estimates .8	DMG2	0.80
03/15/23	Review and respond to Peter Valori email re: laundry lawyer's letter .1; review and respond to Peter Valori email re: fire investigator .1; review and respond to Peter Valori email re: roofer insurance .1; and review and respond to Peter Valori email re: roofing contract .1	DMG2	0.40
03/16/23	Review and respond to Peter Valori email re: pending issues to be discussed including lawsuits against New World .1	DMG2	0.10
03/16/23	Analyze the Association's Crime Protection Policy, 39 pages, in furtherance of evaluating potential covered claims under that Policy	ERT	0.60
03/16/23	Finish analyzing the Association's 7/2/22-7/2/23 Commercial Umbrella Liability Policy, 53 pages, in furtherance of evaluating potential	ERT	0.60

	covered claims under that Policy		
03/17/23	Review and respond to Peter Valori email re: insurance payment .1; review and respond to Peter Valori email re: elite Innovation .1; and review and respond to Peter Valori email re: insurance .1	DMG2	0.30
03/18/23	Review and respond to Peter Valori email re: retainer agreement .1	DMG2	0.10
03/20/23	Review and respond to Peter Valori email with estimate of rebuild .2; review and respond to Peter Valori email with appraisal .2; review and respond to Reese Setae email re: New World meeting .1; legal team zoom meeting re: pending issues .9; review documents sent by Peter Valori .4; review and respond to Peter Valori email re: adjuster .1; and review and respond to Peter Valori email with documents re: certificate and motion/order .2	DMG2	2.10
03/20/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Peter Valori, Esq.) to discuss action items and strategy going forward	ERT	0.80
03/21/23	Initial review of binder with re-building costs .2; review and respond to Peter Valori email re: roofer insurance .1; review and respond to Peter Valori email re: insurance company .1; review and respond to Peter Valori email re: hearing date .1; and review and respond to Peter Valori email re: withdrawal .1	DMG2	0.60
03/22/23	Review and respond to Peter Valori email(s) re: inspection .1; and review and respond to Peter Valori email re: hearing re: certificate .1	DMG2	0.20
03/23/23	Attend zoom meeting with homeowners	DMG2	1.80
03/23/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss action items and strategy going forward	ERT	1.90
03/25/23	Review and respond to Peter Valori email re: preservation of evidence .1	DMG2	0.10
03/27/23	Attend meeting with unit owners re: informational meeting	DMG2	1.60
03/27/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners to discuss Declaration of Condominium (regarding the homeowners' decision to sell the land or rebuild) and other issues	ERT	1.60
03/28/23	Review court order re: approve certificate	DMG2	0.10

03/29/23	Analyze the Association's 7/26/22-7/26/23 Windstorm and/or Hail Insurance Policy, 46, and Miscellaneous Professional Liability Insurance Policy, 13 pages, in furtherance of evaluating potential covered claims under those (and other) Policies	ERT	0.90
03/29/23	Begin to draft analysis of Association's insurance policies (begin to draft Section I - Pertinent Policy Provisions, pp. 1-9)	ERT	2.20

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	16.90	12,675.00
ERT	Eric Thompson	Partner	400.00	16.10	6,440.00

TOTAL FOR SERVICES **\$19,115.00**

Outstanding Statements as of April 7, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21299696	March 31, 2023	\$13,745.00
Total Accounts Receivable Balance:		\$13,745.00

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David Gersten
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dgersten@grsm.com

April 7, 2023
ID: GERSP 1299620
Invoice No. 21302964
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2023

Fees For Professional Services:	\$19,115.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$19,115.00

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: 21302964

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Damian | Valori | Culmo

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Fax. 305-371-3965
mdhanji@dvlp.com

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

Invoice

Invoice Date: 3/31/2023
Invoice No: 23044
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
02/03/2023	[No charge] Attending meeting with counsel regarding potential receivership, drafting proposed order.	MME		2.30	\$0.00
02/08/2023	Receipt and review order (.3); handling communication set up, website and phone lines (.5).	MME	\$550.00	0.80	\$440.00
02/08/2023	Review of Receivership order regarding planning initial steps as to information gathering and securing property and email with M. Damian regarding same.	PFV	\$550.00	0.30	\$165.00
02/08/2023	Review management company public information.	PFV	\$550.00	0.10	\$55.00
02/08/2023	Review sunbiz report regarding corporate control persons.	PFV	\$550.00	0.20	\$110.00
02/08/2023	Analyze first request for information needs (.4); and prepare information request to management company and directors (.5).	PFV	\$550.00	0.90	\$495.00
02/09/2023	Telephone call with Captain of Fire Department regarding inspections and status of building and City issues and update with co-counsel regarding same (.6); update with Receiver regarding status and initial strategy (.4).	MME	\$550.00	1.00	\$550.00
02/09/2023	Analyze order appointing receiver in preparation of working on notice of appearance and receiver's oath (0.1); work on notice of appearance (0.2); work on receiver's oath (0.2); analyze questions to ask unit owners in preparation of communications with same (0.1).	MJL	\$350.00	0.60	\$210.00
02/09/2023	Conference with Receiver regarding initial action plan.	PFV	\$550.00	0.30	\$165.00
02/09/2023	Review oath of office and email receiver regarding same.	PFV	\$550.00	0.10	\$55.00
02/09/2023	Review and revised document demand letter and add requests for additional insurance information.	PFV	\$550.00	0.30	\$165.00
02/09/2023	Call with Captain of Fire Department regarding status of building and inspection request.	PFV	\$550.00	0.20	\$110.00

02/09/2023	Review notice of appearance.	PFV	\$550.00	0.10	\$55.00
02/09/2023	Prepare summary of communication protocol for receiver phone calls.	PFV	\$550.00	0.50	\$275.00
02/10/2023	Telephone call and follow-up with Prestige Management Company (.6); update with Receiver (.3).	MME	\$550.00	0.90	\$495.00
02/10/2023	[Reduced time] Analyze news articles written about the subject incident in preparation of working on master timeline and list of residents (0.2); analysis of corporate documents regarding management company in preparation of working on letters to unit owners and tenants (0.3); investigation into property manager, D. Brooks, via LinkedIn and Sunbiz in preparation of same (0.2); create intake form in preparation of communications with unit owners/tenants (0.3); analyze Association's insurance documents regarding preliminary analysis as to whether coverage existed for subject incident (0.9); email communications with Receiver concerning overview of initial information (0.7); email communications with D. Brooks regarding her providing documents in her file on the subject condominium association (0.1); work on master contact list of unit owners and tenants (0.4); compare listing provided by D. Brooks with information on property appraiser website in preparation of sending letter to unit owners/tenants (0.7); analyze updated case law regarding notice of receivership to condominium owners in preparation of sending letters to same (0.8).	MJL	\$350.00	3.40	\$1,190.00
02/10/2023	Review Circuit Court complaint regarding allegations giving rise to receivership and factual background.	PFV	\$550.00	0.40	\$220.00
02/10/2023	Conference with property management company representative regarding preliminary information gathering.	PFV	\$550.00	0.50	\$275.00
02/10/2023	Prepare preliminary status report regarding same.	PFV	\$550.00	0.30	\$165.00
02/10/2023	Draft letter to Truist Bank regarding account change over.	PFV	\$550.00	0.30	\$165.00
02/10/2023	Work on case analysis regarding potential insurance claims.	PFV	\$550.00	0.30	\$165.00
02/10/2023	Review unit owner contact list.	PFV	\$550.00	0.20	\$110.00
02/10/2023	Prepare letter to unit owners informing them of the entry of the receivership order.	PFV	\$550.00	0.20	\$110.00
02/10/2023	Review email from Truist Bank regarding notice of receivership order and request for service of process (.1); and draft response to same (.1).	PFV	\$550.00	0.20	\$110.00
02/10/2023	Review Florida Statutes 718.127 regarding required notice and receivership order regarding same.	PFV	\$550.00	0.30	\$165.00
02/10/2023	Draft email regarding distribution method for notification letter.	PFV	\$550.00	0.10	\$55.00
02/10/2023	[No charge] Review notice of filing oath of receiver.	PFV		0.10	\$0.00
02/10/2023	Call with roofer regarding request to retrieve tools and equipment.	PFV	\$550.00	0.20	\$110.00
02/10/2023	Draft status report regarding same.	PFV	\$550.00	0.20	\$110.00

02/13/2023	Email communications with D. Brooks regarding inability to access documents which she provided via Google Drive (0.1); analyze documents which D. Brooks provided via email, including fire report (0.3); analyze current contact list of unit owners in preparation of sending out letters regarding receivership (0.1); telephone call with J. Ladquerre regarding insurance claim for unit (0.2).	MJL	\$350.00	0.70	\$245.00
02/13/2023	Review message from Deputy City Manager and return call.	PFV	\$550.00	0.10	\$55.00
02/13/2023	Draft email to M. Damian regarding same.	PFV	\$550.00	0.10	\$55.00
02/13/2023	Email regarding resident access inquiry.	PFV	\$550.00	0.20	\$110.00
02/13/2023	Preliminary review of General Liability policy.	PFV	\$550.00	0.30	\$165.00
02/13/2023	Preliminary review of surplus lines insurance.	PFV	\$550.00	0.30	\$165.00
02/14/2023	Telephone call with T. Humphreys regarding salvaging items from rental property (0.2); email communications with Receiver concerning documents received by D. Brooks (0.1); analyze photos of fire which D. Brooks provided via email (0.2); same for statements to unit owners (0.1); telephone call with J. Baptiste regarding salvaging items from his unit (0.2).	MJL	\$350.00	0.80	\$280.00
02/14/2023	Conference with consultant regarding building permitting history.	PFV	\$550.00	0.40	\$220.00
02/14/2023	Review pre-certification inspection report.	PFV	\$550.00	0.40	\$220.00
02/14/2023	Review engineer's habitability letter.	PFV	\$550.00	0.30	\$165.00
02/14/2023	Review photo bank of fire damages provided by engineer Morandi.	PFV	\$550.00	0.50	\$275.00
02/14/2023	Draft status report regarding 40 year precertification, habitability letter and fire damage photos.	PFV	\$550.00	0.20	\$110.00
02/14/2023	Research regarding architect.	PFV	\$550.00	0.40	\$220.00
02/14/2023	Draft email to architect Gomez.	PFV	\$550.00	0.30	\$165.00
02/14/2023	Research regarding structural engineer.	PFV	\$550.00	0.30	\$165.00
02/14/2023	Draft email to structural engineer.	PFV	\$550.00	0.20	\$110.00
02/14/2023	Research regarding mechanical, electrical, and plumbing engineers.	PFV	\$550.00	0.30	\$165.00
02/14/2023	Draft email to MEP engineer.	PFV	\$550.00	0.20	\$110.00
02/14/2023	Draft status report regarding professionals.	PFV	\$550.00	0.10	\$55.00
02/14/2023	Review message regarding contact from the Mayor's office and respond to same.	PFV	\$550.00	0.10	\$55.00
02/14/2023	Communications with potential debris removal contractor.	PFV	\$550.00	0.30	\$165.00

02/15/2023	Telephone call with J. Leguerre and his attorney regarding letter necessary to utilize mortgage insurance (0.3); work on master contact list and call log (0.6); analyze letter of habitability in preparation of sending same to unit owners or uploading same on receivership website (0.1); meeting with city officials and Receiver concerning next steps for unit owners and tenants to retrieve their belongings and/or move back into their units (0.9); email communications with O. Diaz concerning same (0.3); telephone call with K. Pollard regarding her vehicle located on the property (0.2); update call log to reflect same (0.1); telephone call with E. Connor regarding updates on moving back into her unit (0.5); update call log to reflect same (0.1); communications with R. Castro concerning ownership interest in unit (0.1).	MJL	\$350.00	3.20	\$1,120.00
02/15/2023	Meeting with City and Receiver regarding next steps (.5); telephone calls with P. Valori regarding access to units on site (.4); responding to homeowner issue with Morgan Levine (.2).	MME	\$550.00	1.10	\$605.00
02/15/2023	Research regarding fire suppression and alarm requirements.	PFV	\$550.00	0.40	\$220.00
02/15/2023	Email with receiver regarding contacts with City of Miami Gardens leadership and preliminary action plan to allow access and to potentially restore partial habitability.	PFV	\$550.00	0.30	\$165.00
02/15/2023	Review email regarding information flow regarding owner inquiries.	PFV	\$550.00	0.10	\$55.00
02/15/2023	Review email regarding owner partial access requests.	PFV	\$550.00	0.10	\$55.00
02/15/2023	Conference with M. Levine regarding unit owner request for report and interaction regarding potential claims.	PFV	\$550.00	0.20	\$110.00
02/15/2023	Review email to Mr. Clay regarding post meeting next steps.	PFV	\$550.00	0.10	\$55.00
02/15/2023	Review binder of documents for site visit including receivership order and Morandi report (.4); site visit at New World property and engage in property inspection, consult with Captain of Fire Department, Building Official of City of Miami Gardens, structural engineer, and unit owners, (4.5); and work on summary report (1.7).	PFV	\$550.00	6.60	\$3,630.00
02/15/2023	Meeting with various vendors on site regarding estimates with vendors concerning security, safety, and clean up.	og	\$120.00	7.00	\$840.00
02/15/2023	Verify and update unit owners' addresses in accordance with property appraiser's website to mail letter regarding order appointing receiver (2.5); finalize letter to unit owners (.3); mail letter to all unit owners at all addresses known for each (2).	rs	\$100.00	4.80	\$480.00
02/16/2023	[No charge] Research possible emergency funding options at the state, local, and federal level.	js		2.20	\$0.00
02/16/2023	[No charge] Conference call regarding strategy for receivership procedures and operations.	js		0.80	\$0.00
02/16/2023	Meeting with Receiver and counsel regarding status of property and next steps.	MME	\$550.00	0.60	\$330.00
02/16/2023	Email with Receiver regarding status.	PFV	\$550.00	0.10	\$55.00
02/16/2023	Email with M. Damian regarding funding and FAQs.	PFV	\$550.00	0.40	\$220.00

02/16/2023	Email regarding research regarding possible public financial assistance.	PFV	\$550.00	0.10	\$55.00
02/16/2023	Email regarding Association receivership email address.	PFV	\$550.00	0.10	\$55.00
02/16/2023	Attend status conference with Receiver and team regarding physical plant and financial issues.	PFV	\$550.00	0.80	\$440.00
02/16/2023	Review correspondence from building official regarding plan for access; prepare e-mail regarding same.	PFV	\$550.00	0.30	\$165.00
02/16/2023	Draft email regarding notice of appearance for the association in the Baptiste case.	PFV	\$550.00	0.20	\$110.00
02/16/2023	Review and revised diagram regarding location of construction fence.	PFV	\$550.00	0.20	\$110.00
02/16/2023	Draft email regarding total unit count.	PFV	\$550.00	0.20	\$110.00
02/16/2023	Review email regarding notification of receivership.	PFV	\$550.00	0.10	\$55.00
02/16/2023	Additional email with Building Official regarding access plan.	PFV	\$550.00	0.30	\$165.00
02/16/2023	Review of site diagram and work on access planning.	PFV	\$550.00	0.30	\$165.00
02/16/2023	Emails and telephone call with M. Levine regarding taking control of bank account at Truist Bank and provide draft demand letter and contact information for Bank representative (.2); review demand letter sent to bank and email from bank representative regarding same and freezing of account (.1).	KDM	\$550.00	0.30	\$165.00
02/17/2023	Reviewing and executing account opening documents (.2); reviewing plans regarding stage 1 recovery of items(.3); reviewing and responding to e-mails fencing issues and resident issues (.3).	MME	\$550.00	0.80	\$440.00
02/17/2023	Telephone call with T. Humphreys regarding when she may access unit to retrieve personal belongings (0.3); telephone call with J. Laguerre and K. Stantz regarding letter to mortgage company (0.7); work on getting insurance for the receiver and the association (0.3); email communications with A. Porosoff regarding obtaining estimate of land value (0.1); email communications with D. Brooks regarding the keys to electric room and common elements for the association (0.1); telephone call with Michael regarding same (0.2); telephone call with D. Brooks regarding same (0.1); email communications with G. Calero of Truist bank regarding the receiver's access, control, and possession of the association's bank account (0.1); email communications with C. Ruiz of Truist regarding same (0.1); email communications with G. Calero regarding further assistance with bank account due to unavailability of C. Ruiz (0.1); telephone call with E. Connor and S. Acevedo regarding updates on progress made and Zoom meeting for residents (1.2); work on frequently asked questions to be posted on receivership website (0.3).	MJL	\$350.00	2.80	\$980.00
02/17/2023	[No charge] Research regarding possible emergency funding options at the state, local and federal level.	js		1.50	\$0.00
02/17/2023	Work on draft Receiver's Initial Report.	js	\$150.00	0.60	\$90.00
02/17/2023	Respond to New World tenants' phone calls.	js	\$150.00	1.00	\$150.00

02/17/2023	Review property information and email with real estate agent regarding possible land value for contingency comparison.	PFV	\$550.00	0.20	\$110.00
02/17/2023	Review email from Truist bank regarding account change over.	PFV	\$550.00	0.20	\$110.00
02/17/2023	Conference call regarding FAQ preparation and content.	PFV	\$550.00	0.20	\$110.00
02/17/2023	Conferences with O. Garcia regarding architect meeting and request for preliminary analysis and fence company quote.	PFV	\$550.00	0.40	\$220.00
02/17/2023	Draft update regarding contact information for building official, adjuster and fire department official.	PFV	\$550.00	0.10	\$55.00
02/17/2023	Email with broker regarding request for broker opinion of land value.	PFV	\$550.00	0.30	\$165.00
02/17/2023	Review affidavit of service upon Association.	PFV	\$550.00	0.10	\$55.00
02/17/2023	Confer with broker regarding broker opinion of value.	PFV	\$550.00	0.30	\$165.00
02/17/2023	Work on preliminary analysis of tear down versus rehab (.4); and draft status memorandum regarding same (.3).	PFV	\$550.00	0.70	\$385.00
02/17/2023	Email with former property manager regarding obtaining keys to electrical rooms and common areas.	PFV	\$550.00	0.20	\$110.00
02/17/2023	Further emails with Truist Bank regarding the freezing of the account and Bank representation who will assist with turnover of account and related matters and discuss with team members (.2); emails with Receiver and M. Damian and telephone call with M. Damian regarding obtaining insurance for Receiver and professionals, discuss with M. Levine same and certain information regarding Association needed to obtain insurance proposal, email from M. Levine regarding same and Order Appointing Receiver and condominium documents, review Order and send email to insurance broker regarding the duties of the Receiver and nature of the receivership and requesting quote for policy (.5).	KDM	\$550.00	0.70	\$385.00
02/17/2023	Meet with additional vendors regarding fence and safety issues.	og	\$120.00	4.50	\$540.00
02/17/2023	Telephone conference with P. Valori and M. Levine (.2); review and respond to emails from owners (.3); return call to owners with inquiries (.3); email to M. Levine regarding FAQ post (.1); email to staff with update on procedures regarding calls and inquiries (.1).	rs	\$100.00	1.00	\$100.00

02/18/2023	Analyze previous fire code violations filed in the Miami-Dade public records to determine whether Association had been aware of risk (0.6); analyze condominium documents to determine whether Kaufman language is contained therein (0.7); same with focus on determining definition of common elements and limited common elements (0.6); same with focus on determining scope of repairs (0.7); same to determine insurance requirements if any (0.6); same to determine percentage needed to dissolve association (0.2); investigation into community association management licensing for property management company and property manager via DBPR website, including analysis of complaints filed against same (0.3); work on timeline of events which led to the subject fire (0.4); analyze cases filed by J. Baptiste against the Association and other associations managed by Prestige Management Solutions, Inc. (0.8); analyze corporate documents of the Association to determine date in which Prestige Management Solutions, Inc. became manager of the Association (0.2).	MJL	\$350.00	5.10	\$1,785.00
02/18/2023	Further emails with insurance broker regarding application to fill out to obtain proposal for insurance policy for Receiver and professionals and link to online application, log in to online portal and review pre-filled application, gather materials to assist with completing application, and prepare and send email to team members regarding the financial information needed to complete the application and providing materials to assist with same (.5); emails with M. Levine and insurance broker regarding granting access to insurance application and related matters (.1).	KDM	\$550.00	0.60	\$330.00
02/19/2023	Analyze statements to unit owners to determine amount due to association (0.8); email communications with D. Heimberger regarding updates to website (0.1); email communications with residents regarding same (0.2); email communications with the Receiver regarding same (0.1); work on frequently asked questions in preparation of same (0.9); email communications with the Receiver regarding rescheduling meeting (0.1).	MJL	\$350.00	2.20	\$770.00
02/20/2023	Email communications with D. Heimberger regarding updates to website (0.1); email communications with residents regarding rescheduling of Zoom meeting (0.1); work on list of frequently asked questions and answers to same (0.9); investigation into community association management licensing for Prestige Group of Companies, LLC via DBPR website to determine whether same is licensed within the state (0.1); analyze condominium documents to determine scope of repairs (0.3); analyze updated case law regarding legislative history of Florida's Condominium Act in 1996 to determine whether termination language contained in condominium documents is presently binding on the association (0.9).	MJL	\$350.00	2.40	\$840.00
02/20/2023	Prepare status report regarding preliminary broker's opinion of value and analysis of possible contingency plans.	PFV	\$550.00	0.30	\$165.00
02/20/2023	Review spreadsheet regarding unpaid maintenance fees and draft status report regarding same.	PFV	\$550.00	0.30	\$165.00

02/20/2023	Draft email regarding bookkeeping and accounting functions.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Email with receiver regarding status conference.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Review condominium documents regarding circumstances under which termination is mandatory and draft email concerning same and concerning other instances of termination.	PFV	\$550.00	0.40	\$220.00
02/20/2023	Analyze whether potential damages claims may exist as to third parties.	PFV	\$550.00	0.30	\$165.00
02/20/2023	Email regarding preparation of key provisions version of condominium documents.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Review fence estimate.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Prepare email regarding request for approval to commence work on fence.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Review email regarding follow up call from roofer and draft response.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Draft email regarding proposal to request unit owner insurance and mortgage information.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Review and revise FAQs (.4); and draft email regarding same. (.1).	PFV	\$550.00	0.50	\$275.00
02/20/2023	Review memorandum regarding possible disaster loans.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Draft email regarding search for temporary trailers or housing.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Email regarding utility key turn over.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Review email regarding insurance for receiver and attachments.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Draft email regarding same receiver insurance application content.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Email regarding take over of Truist account.	PFV	\$550.00	0.10	\$55.00
02/20/2023	Emails with P. Valori and M. Levine regarding the financial information to be submitted with application for insurance for Receiver and professionals and provide further input regarding filling out application.	KDM	\$550.00	0.20	\$110.00
02/20/2023	Review email regarding condominium documents requested.	PFV	\$550.00	0.20	\$110.00
02/20/2023	Meeting with various vendors on site regarding estimates with vendors concerning engineering and clean up.	og	\$120.00	8.50	\$1,020.00
02/20/2023	Receipt and review of questionnaire from owners (.3); update spreadsheet regarding same (.2); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	1.00	\$100.00
02/21/2023	(No charge) Attending meeting with unit owners.	MME		1.50	\$0.00

02/21/2023	Work on information request form which will be used to obtain insurance and mortgage information for unit owners and tenants (0.9); analyze condominium documents regarding determine procedure for dissolving the Association in preparation of zoom meeting with unit owners (0.8); analyze estimates from fencing companies in preparation of same (0.3); meet with unit owners and tenants via Zoom to discuss updates and answer questions regarding the receivership (2.4); email communications with D. Brooks regarding financials necessary to obtain receivership insurance (0.1); analyze budget provided by D. Brooks in preparation of completing insurance application (0.1); work on insurance application with focus on financial information section (0.1); email communications unit owners and tenants concerning account balances and frequently asked questions (1.1).	MJL	\$350.00	5.80	\$2,030.00
02/21/2023	Review email from receiver and prepare simplified agenda.	PFV	\$550.00	0.30	\$165.00
02/21/2023	Review email from receiver and revised FAQs to simplify language.	PFV	\$550.00	0.30	\$165.00
02/21/2023	Conference with O. Garcia regarding additional fence company quotes.	PFV	\$550.00	0.20	\$110.00
02/21/2023	Attend conference with Unit owners.	PFV	\$550.00	2.30	\$1,265.00
02/21/2023	Email regarding site visit.	PFV	\$550.00	0.10	\$55.00
02/21/2023	Email regarding two additional fence quotes.	PFV	\$550.00	0.10	\$55.00
02/21/2023	Email regarding analysis of repair provision of declaration.	PFV	\$550.00	0.20	\$110.00
02/21/2023	Email from M. Levine forwarding 2022 and 2023 budgets for the Association for purposes of Application for insurance policy for Receiver and professionals, review same and the partially completed Application, complete application and submit to insurance broker, and emails with team members regarding same (.4); emails with insurance broker regarding the completed Application and the budgets attached in support (.1).	KDM	\$550.00	0.50	\$275.00
02/21/2023	Meeting with various vendors on site regarding estimates with vendors concerning reconstructions and demolition.	og	\$120.00	7.50	\$900.00
02/21/2023	Review court docket (.1); review and analyze affidavit of service on association (.1); email to P. Valori and M. Levine regarding same and Complaint (.2); emails to and from P. Valori regarding weekly status meetings and meetings with owners (.2); receipt and review of questionnaire from owners (.3); update spreadsheet regarding same (.2); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	1.60	\$160.00

02/22/2023	Email communications with Truist regarding contempt of court for failure to turn over bank account within 10 days pursuant to February 10, 2023 demand letter and Order Appointing Receiver (0.1); email communications with D. Brooks concerning wind insurance (0.1); email communications with D. Brooks regarding updated Dropbox account (0.1); telephone call with E. Herring concerning current statement balance (0.2); email communications with D. Brooks regarding accounting information (0.2); analyze legislative history concerning dissolution under Condominium Act in 1996 to determine whether statute conflicts with declaration of condominium (0.7); work on spreadsheet for unit owner insurance and mortgage data (0.8); email communications with unit owners regarding statement balances (0.6).	MJL	\$350.00	2.80	\$980.00
02/22/2023	[No charge] Respond to email from New World tenant in Spanish.	js		0.50	\$0.00
02/22/2023	Research regarding 1996 version of a Florida Statute in reference to terminating a condominium association.	js	\$150.00	0.40	\$60.00
02/22/2023	Research regarding temporary housing availability for New World residents.	js	\$150.00	1.10	\$165.00
02/22/2023	Research regarding amendment process to condominium declaration under both the declaration and Florida Statutes.	js	\$150.00	0.80	\$120.00
02/22/2023	[No charge] Telephone conferences with New World tenant's and update call log.	js		0.30	\$0.00
02/22/2023	Attend zoom meeting with City officials.	PFV	\$550.00	1.00	\$550.00
02/22/2023	Draft status memorandum.	PFV	\$550.00	0.40	\$220.00
02/22/2023	Review email regarding analysis of condominium documents regarding right to amend.	PFV	\$550.00	0.20	\$110.00
02/22/2023	Draft email to real estate lawyer regarding casualty provision.	PFV	\$550.00	0.20	\$110.00
02/22/2023	Email with Judge regarding status conference.	PFV	\$550.00	0.20	\$110.00
02/22/2023	Conference with D. Brooks regarding payables and condominium history.	PFV	\$550.00	0.40	\$220.00
02/22/2023	Review email regarding wind coverage demand for repairs within 30 days (.2); and draft email regarding same (.1).	PFV	\$550.00	0.30	\$165.00
02/22/2023	Prepare update regarding prior payment history and potential plans for association.	PFV	\$550.00	0.40	\$220.00
02/22/2023	Prepare email regarding research regarding condominium association liens.	PFV	\$550.00	0.20	\$110.00
02/22/2023	Email regarding bank account take over.	PFV	\$550.00	0.10	\$55.00
02/22/2023	Meeting with various vendors on site regarding estimates with vendors concerning engineering and clean up.	og	\$120.00	8.50	\$1,020.00

02/22/2023	Telephone conference with M. Levine (.5); review each unit's financial statements and update spreadsheet regarding same (.5); emails to and from receiver's office regarding weekly meetings (.2); receipt and review of questionnaire from owners (.2); update spreadsheet regarding same (.3); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	2.20	\$220.00
02/23/2023	Email communications with D. Brooks regarding Association's accountant (0.1); work on frequently asked questions to be posted on website (0.1); email communications with IT department concerning updating website (0.1); telephone call with D. Brooks regarding wind insurance, statement balances, and other management items (0.2); email communications with unit owners regarding bank statements and request information forms (0.6).	MJL	\$350.00	1.10	\$385.00
02/23/2023	Working on financing alternatives to fund next steps and meeting with P. Valori regarding same.	MME	\$550.00	1.50	\$825.00
02/23/2023	Research Florida law regarding court ordered demolition of a building or dissolution of a condominium association.	js	\$150.00	2.90	\$435.00
02/23/2023	[No charge] Talk with Peter regarding research regarding Condominium liens and related matters.	js		0.70	\$0.00
02/23/2023	Research regarding various issues related to condominium liens.	js	\$150.00	1.10	\$165.00
02/23/2023	Review and analyze declaration and statutes regarding obligations to rebuild and possible grounds to dissolve a condominium association and work on research regarding same.	PFV	\$550.00	1.90	\$1,045.00
02/23/2023	Conference with fence contractor.	PFV	\$550.00	0.20	\$110.00
02/23/2023	Email with Receiver regarding approval of fence proposal.	PFV	\$550.00	0.10	\$55.00
02/23/2023	Conferences with real estate counsel regarding interpretation of declaration and rights and obligations of association under condominium statute.	PFV	\$550.00	0.80	\$440.00
02/23/2023	Conferences regarding financial status of association and fundraising related matters.	PFV	\$550.00	0.80	\$440.00
02/23/2023	Review site plan and preliminary zoning analysis.	PFV	\$550.00	0.30	\$165.00
02/23/2023	Draft status reports.	PFV	\$550.00	0.30	\$165.00
02/23/2023	Email with Red Cross representative.	PFV	\$550.00	0.10	\$55.00
02/23/2023	Email with structural engineer.	PFV	\$550.00	0.20	\$110.00
02/23/2023	Conference with broker regarding possible uses and values and related matters.	PFV	\$550.00	0.40	\$220.00
02/23/2023	Emails with insurance broker regarding the application submitted to obtain quotes for insurance policy for Receiver and professionals and the timing of obtaining same and provide update to team members.	KDM	\$550.00	0.20	\$110.00
02/23/2023	Additional meetings with vendors regarding safety and clean up at property.	og	\$120.00	7.30	\$876.00

02/23/2023	Emails to and from receiver's office regarding weekly meetings (.2); receipt and review of questionnaire from owners (.2); update spreadsheet regarding same (.3); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	1.20	\$120.00
02/24/2023	Email communications with W. Mora regarding information request form and other information regarding the association (0.2); email communications with Prestige Management Realty LLC regarding approval letter (0.1); analyze information request forms submitted by unit owners regarding mortgage and insurance information (0.3); work on updating spreadsheet to reflect same information (0.1).	MJL	\$350.00	0.70	\$245.00
02/24/2023	Meeting with P. Valori regarding financing and next steps and interpretation of documents.	MME	\$550.00	0.80	\$440.00
02/24/2023	Research and draft memorandum regarding condominium liens.	js	\$150.00	2.50	\$375.00
02/24/2023	Respond to New World tenants' phone calls and update call log.	js	\$150.00	1.10	\$165.00
02/24/2023	Research regarding potential zoning and sale issue.	PFV	\$550.00	0.50	\$275.00
02/24/2023	Site visit at property and meeting with Receiver, Building Official and fence contractor.	PFV	\$550.00	1.40	\$770.00
02/24/2023	Review Chapter 718 and condominium declaration and conference with outside counsel regarding background and request for opinion letter.	PFV	\$550.00	0.80	\$440.00
02/24/2023	Follow up call regarding fence contractor fencing on catwalk areas.	PFV	\$550.00	0.10	\$55.00
02/24/2023	Draft email to potential certificate investor.	PFV	\$550.00	0.10	\$55.00
02/24/2023	Prepare status report regarding declaration provision and implementation and status of fence work.	PFV	\$550.00	0.60	\$330.00
02/24/2023	Meet with fence company and oversee installation.	og	\$120.00	6.50	\$780.00
02/24/2023	Receipt and review of questionnaire from owners (.2); update spreadsheet regarding same (.3); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	1.00	\$100.00
02/26/2023	Analyze corporate documents for unit owners which are entities to determine contact information for same in preparation of communications with unit owners regarding same (0.4); analyze updated account statements provided by D. Brooks to determine whether unit owners are up to date on their bills (0.9).	MJL	\$350.00	1.30	\$455.00

02/27/2023	Email communications with R. Hernandez regarding maintenance fees and special assessments for unit 240 (0.1); email communications with S. Acevedo regarding units 142 and 215 insurance and mortgage (0.1); email communications with Prestige Realty regarding approval letter (0.1); email communications with A. Santana regarding information request form (0.1); email communications with property management company for unit 204 regarding same (0.1); email communications with M. Torres regarding maintenance fees and special assessments (0.1); email communications with AAA Management regarding dissolution, special assessments, ownership interest, among other things (0.6); email communications with the Receiver regarding provisions of condominium documents (0.1); communications with O. Garcia regarding fencing on property (0.1); meeting with Receiver regarding provisions of the Declaration of Condominium and next steps (1.2); analyze condominium documents to determine steps necessary to dissolve association in preparation of working on memorandum regarding provisions of declaration of condominium pertaining to dissolution of association and proposed next steps (0.6); work on memorandum regarding same with focus on provisions of condominium documents (0.9); same with focus on next steps (0.6); analyze map of property in preparation of working on memorandum regarding retrieval of personal property and proposed next steps regarding same (0.4); work on memorandum regarding same with focus on schedule for retrieval of personal items (0.9); same with focus on rules for persons to retrieve personal items (0.4); communications with D. Brooks regarding requested documents (0.3); analyze video of fire obtained from neighbor's ring camera in preparation of communications with tenants and owner of unit 217 (0.3); investigation into ownership of unit 217, including analysis of deed and public documents pertaining to land trust in preparation of same (0.6); investigation into trustee of land trust via Florida Bar website in preparation of same (0.2); investigation into Vallejo Consulting International LLC via Sunbiz, including analysis of corporate documents in preparation of same (0.3).	MJL	\$350.00	8.10	\$2,835.00
02/27/2023	Conference with project manager regarding visitation.	PFV	\$550.00	0.20	\$110.00
02/27/2023	Conference with Judge Gersten regarding status and planning.	PFV	\$550.00	0.90	\$495.00
02/27/2023	Conferences with project manager and M. Levine regarding owner access planning and coordination with City of Miami Gardens.	PFV	\$550.00	0.80	\$440.00
02/27/2023	Conferences with M. Levine regarding preparation of plan of possible termination of association and potential partition action.	PFV	\$550.00	0.40	\$220.00
02/27/2023	Conference with project manager regarding quotes for debris removal, quotes for rebuild and quotes for demolition.	PFV	\$550.00	0.80	\$440.00
02/27/2023	Review email from M. Damian and Judge Gersten regarding financing.	PFV	\$550.00	0.10	\$55.00

02/27/2023	Conferences with paralegal regarding mortgage and lien searches and conduct preliminary recorder office records regarding process.	PFV	\$550.00	0.40	\$220.00
02/27/2023	Research regarding partition statute (.8); and work on memorandum regarding next steps as to termination (.8).	PFV	\$550.00	1.60	\$880.00
02/27/2023	Conference with Judge Gersten and team regarding status and planning.	PFV	\$550.00	1.20	\$660.00
02/27/2023	Review ring camera videos of fire event regarding assessment of potential liability.	PFV	\$550.00	0.40	\$220.00
02/27/2023	Multiple emails with insurance broker regarding the initial proposals obtained for insurance policy for Receiver and professionals and status of receiving additional proposal, request additional information regarding the ratings of the insurers and details of coverages, review same, and request clarification of coverages.	KDM	\$550.00	0.30	\$165.00
02/27/2023	Telephone calls with potential lenders regarding financing interim needs of Receivership (.8); attending a portion of attorney roundup with Receiver on status and next steps (.8).	MME	\$550.00	1.60	\$880.00
02/27/2023	Telephone conference with P. Valori regarding owners' mortgages, assignments and liens on each unit and strategy moving forward (.2); email to D. Bissell regarding upcoming owners' meeting and website (.1); emails to and from receiver's office regarding weekly meetings (.2); receipt and review of questionnaire from owners (.2); update spreadsheet regarding same (.3); review and respond to emails from owners (.3); return call to owners with inquiries (.2).	rs	\$100.00	1.50	\$150.00
02/28/2023	Work on memorandum to the Receiver concerning retrieval of personal possessions from first group of units with focus on revisions for makeup days (0.3); communications with owner of unit 205 regarding updates on premises (0.3); email communications with Receiver concerning updates on case (0.1); email communications with unit owners regarding zoom meeting schedule for March 1, 2023 (0.1).	MJL	\$350.00	0.80	\$280.00
02/28/2023	Call with M. Damian regarding requests for possible construction loans and status and planning.	PFV	\$550.00	0.30	\$165.00
02/28/2023	Review May 2022 board minutes.	PFV	\$550.00	0.20	\$110.00
02/28/2023	Review email from Red Cross regarding unit owner access and draft response.	PFV	\$550.00	0.10	\$55.00
02/28/2023	Work on preliminary fire causation analysis.	PFV	\$550.00	0.60	\$330.00
02/28/2023	Prepare status report for receiver regarding fire causation related matters.	PFV	\$550.00	0.40	\$220.00
02/28/2023	Email with fire department and Receiver regarding report of fire department.	PFV	\$550.00	0.20	\$110.00
02/28/2023	Call with Building Official regarding phase 1 move out.	PFV	\$550.00	0.20	\$110.00
02/28/2023	Email with Building Official and Fire and Police regarding same.	PFV	\$550.00	0.10	\$55.00
02/28/2023	Review draft move out schedule and prepare email to receiver regarding same.	PFV	\$550.00	0.20	\$110.00

02/28/2023	Review email regarding Unit 217 background.	PFV	\$550.00	0.20	\$110.00
02/28/2023	Email from insurance broker forwarding proposal for insurance policy for receiver and professionals and providing update regarding status of second proposal, review proposal, and send email to broker requesting explanation regarding certain provisions and reduced deductible.	KDM	\$550.00	0.40	\$220.00
02/28/2023	Strategy meeting regarding allowing residents to retrieve their possession on property and security regarding same.	og	\$120.00	2.00	\$240.00
02/28/2023	Meet with P. Valori regarding mortgages and liens on units (.2); begin search of public records for any owners' mortgages, assignments and liens on each unit (.5); create spreadsheet for same (.2); receipt and review of questionnaire from owners (.2); update spreadsheet regarding same (.2); review and respond to emails from owners (.3).	rs	\$100.00	1.60	\$160.00
02/28/2023	(No charge) Telephone call regarding construction loan and potential financing.	MME		0.30	\$0.00
02/28/2023	(No charge) Telephone call regarding construction loan and potential financing.	MME		0.30	\$0.00
03/01/2023	Telephone call with S. Mackanick regarding fire inspection for unit 114 (0.3); analyze class action complaint in preparation of responding to same (0.4); work on plan for supervised access to units (0.3); meeting with unit owners and Receiver via Zoom to discuss updates and schedule for retrieving personal belongings (2.4); telephone call with S. Acevedo regarding retrieval of personal items from units 140 and 141 (0.3).	MJL	\$350.00	3.70	\$1,295.00
03/01/2023	Meeting regarding building access and security for residents.	og	\$120.00	2.50	\$300.00
03/01/2023	Working on financing options, providing documents to lender's counsel.	MME	\$550.00	0.70	\$385.00
03/01/2023	Further emails with insurance broker regarding the initial proposal for the insurance policy to cover Receiver and professionals, whether reduced deductible is an option, and the status of obtaining additional quote from another carrier, and discuss with team members (.3); discuss with M. Damian research issue related to action brought against Association and provide direction to N. Garcia regarding same (.2).	KDM	\$550.00	0.50	\$275.00
03/01/2023	Review class action complaint.	PFV	\$550.00	0.30	\$165.00
03/01/2023	Research regarding Plaintiff tenancy.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Analyze claims regarding possible next steps including a stay motion.	PFV	\$550.00	0.30	\$165.00
03/01/2023	Email with receiver regarding access roll out.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Email with Building Official regarding same.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Attend status conference with receiver regarding new class action complaint.	PFV	\$550.00	0.40	\$220.00
03/01/2023	Review email from reporter requesting comments as to class action case.	PFV	\$550.00	0.20	\$110.00

03/01/2023	Attend status conference with homeowners.	PFV	\$550.00	2.50	\$1,375.00
03/01/2023	Review email regarding fire investigator.	PFV	\$550.00	0.20	\$110.00
03/01/2023	Review email regarding manual operation of East gate.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Review unpaid dues ledger.	PFV	\$550.00	0.20	\$110.00
03/01/2023	Work on planning regarding site visitation and retrieval of personal property.	PFV	\$550.00	0.40	\$220.00
03/01/2023	Review budget and non-renewal notice.	PFV	\$550.00	0.20	\$110.00
03/01/2023	Email with Red Cross regarding access.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Email with adjuster regarding unit # 114.	PFV	\$550.00	0.10	\$55.00
03/01/2023	Research regarding the 1996 version of Florida's condominium statute.	js	\$150.00	1.00	\$150.00
03/01/2023	Draft and Revise memorandum regarding condominium associations, liens, and bankruptcy.	js	\$150.00	2.60	\$390.00
03/01/2023	Review and respond to emails from owners (.2); return call to owners with inquiries (.2); update spreadsheet regarding same (.2); email to staff regarding information to provide to owners upon inquiry (.2); telephone conference with P. Valori regarding anticipated partition suit and searching public records for any mortgages, assignments, liens and/or releases on any unit (.2); email to M. Levine regarding update (.2); receipt and review of emails from receiver's office regarding discussion of class action case and management agreement (.1); set up meeting for same (.2).	rs	\$100.00	1.50	\$150.00
03/02/2023	Email communications with E. Connor, Building Official, and Fire Department regarding rescheduling supervised access to unit 205 (0.1); email communications with R. Castro, Building Official, and Fire Department regarding scheduling additional time for supervised access to unit 240 (0.2); email communications with K. Pollard, Building Official, and Fire Department regarding access to vehicle (0.1); email communications with Dakar Team Real Estate regarding notice of violation received from the City of Miami Gardens and insurance information for unit 222 (0.1); email communications with M. Archie regarding recap of yesterday's meeting (0.1); email communications with A. Oshi regarding access to unit 119 (0.1); email communications with S. Acevedo, Building Official, and Fire Department regarding scheduling additional time for supervised access to unit 240 (0.1); email communications with Y. Strader regarding yesterday's meeting with unit owners and her retention as counsel (0.1); email communications with Dakar Team Real Estate regarding information sheet for units 106 and 241 (0.1); email communications with A. Soraya regarding government assistance programs (0.2); telephone call with O. Garcia regarding today's supervised access for certain unit owners to move out their belongings (0.3); analyze 2021 bank statements to determine potential clawback suits (0.4); same for 2022 bank statements to determine same (0.6); analyze corporate documents of entities paid by Association to determine same (0.1); analyze fire inspection report to determine same (0.3).	MJL	\$350.00	2.90	\$1,015.00

03/02/2023	[Reduced time] Managing resident access and recovery of possessions on property (8.5).	og	\$120.00	7.50	\$900.00
03/02/2023	Reviewing statute and emails regarding same (.4); emails regarding financial issues and alternatives (.4).	MME	\$550.00	0.80	\$440.00
03/02/2023	Analyze complaint filed in class action lawsuit in preparation of working on motion to show cause and for order compelling compliance with order appointing receiver and motion to stay (0.4); analyze order appointing receiver in preparation of same (0.2); analyze updated case law regarding receiver's right to compel compliance with receivership order in preparation of working on motion to show cause (0.8); work on motion to show cause with focus on stay provision set forth in order appointing receiver (0.6); same with focus on S. Whitfield's failure to comply with same (0.8); same with focus on prayer for relief (0.4); analyze updated case law regarding staying litigation during receivership proceedings in preparation of working on motion to stay class action case (1.2).	MJL	\$350.00	4.40	\$1,540.00
03/02/2023	Conference with project manager regarding progress of owner access and household waste disposal procedures.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Review provisions of condominium documents as to dissolution process regarding possible plans for termination.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Review unit owner emails regarding car and possession pick up.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Research regarding identification and qualifications of proposed fire expert.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Conference with fire investigator regarding factual background and site inspection and report preparation.	PFV	\$550.00	0.40	\$220.00
03/02/2023	Confer with Building Official regarding unit # 114 inspection and unsafe structures issues.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Email with counsel for insurance company regarding unit # 114.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Draft update to receiver regarding access, fire inspector.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Draft update regarding unsafe structures board procedures and potential fines and/or demolition order and status of access regarding garbage pick up.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Conference with D. Brooks regarding request for payment be security company and factual background regarding physical plant and association business.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Review email from developer regarding interest in property purchase.	PFV	\$550.00	0.10	\$55.00
03/02/2023	Draft proposed form response as to investor inquires.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Review condominium documents regarding fractional ownership percentages.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Conference with paralegal regarding mortgage and lien searches regarding future notice requirements.	PFV	\$550.00	0.30	\$165.00
03/02/2023	Draft email regarding bank account turn over and demand for payment by security company and payment terms.	PFV	\$550.00	0.20	\$110.00

03/02/2023	Prepare update email to receiver regarding property searches regarding property interest holders.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Review receivership provisions regarding sale process and draft email outlining process and next steps.	PFV	\$550.00	0.40	\$220.00
03/02/2023	Draft email regarding response to potential buyer interest and related issues.	PFV	\$550.00	0.40	\$220.00
03/02/2023	Review email from Captain Forrester regarding report.	PFV	\$550.00	0.20	\$110.00
03/02/2023	Draft email to Captain Forrester requesting additional information.	PFV	\$550.00	0.10	\$55.00
03/02/2023	Preliminary review of Fire Department's investigative report.	PFV	\$550.00	0.40	\$220.00
03/02/2023	Draft update email to receiver.	PFV	\$550.00	0.10	\$55.00
03/02/2023	Draft email to fire investigator.	PFV	\$550.00	0.10	\$55.00
03/02/2023	Research regarding proper parties in a partition action under Florida law.	js	\$150.00	1.00	\$150.00
03/02/2023	Review New World tenant's questions and response to same.	js	\$150.00	0.40	\$60.00
03/02/2023	Email to D. Bissell regarding correcting certain information provided on website (.1); strategize most efficient and cost-effective method in searching for mortgages and liens on all units (.2); emails to and from title and lien company for quote (.2); email to P. Valori regarding quotes from mortgage and lien companies and strategy moving forward (.3); request check for fire report (.1); discuss same with L. Fazza and coordinate obtaining the report from the City (.2); email to O. Garcia regarding scheduling unit owners' access to property (.1).	rs	\$100.00	1.20	\$120.00
03/03/2023	Telephone call with Association's accountant regarding request for tax returns, bank statements, and general ledgers (0.1); email communications with same and D. Brooks regarding same (0.1); work on motion to show cause as to why S. Whitfield and counsel should not be held in contempt for failing to comply with order appointing receiver (1.1); email communications with building official regarding trash collection (0.1).	MJL	\$350.00	1.40	\$490.00
03/03/2023	Telephone calls with counsel for lender.	MME	\$550.00	0.30	\$165.00
03/03/2023	Further emails with insurance broker regarding second proposal for insurance for Receiver and professionals and status of receiving third proposal, review second proposal, investigate ratings of insurance companies for both proposals received to date, and prepare chart comparing same.	KDM	\$550.00	0.70	\$385.00
03/03/2023	Work on motion to stay class action case with focus on argument that plaintiff and counsel violated receivership order (0.8); same with focus on argument that class action is contrary to the best interest of the receivership estate and will deplete funds from same (0.7); analyze updated case law regarding same (1.1).	MJL	\$350.00	2.60	\$910.00
03/03/2023	Review email regarding request of square footage regarding construction company quote request (.1); review documents regarding request (.2); and draft response (.1).	PFV	\$550.00	0.40	\$220.00

03/03/2023	Conference with M. Dhanji regarding security company request for payment and response.	PFV	\$550.00	0.30	\$165.00
03/03/2023	Conference with M. Damian regarding financial planning and vendor selection.	PFV	\$550.00	0.20	\$110.00
03/03/2023	Review research memorandum regarding notice required in partition action and work on comments regarding same.	PFV	\$550.00	0.40	\$220.00
03/03/2023	Review email regarding security company owner contact at property and draft response.	PFV	\$550.00	0.10	\$55.00
03/03/2023	Draft email regarding status report and information regarding content.	PFV	\$550.00	0.10	\$55.00
03/03/2023	[No charge] Research and Draft memorandum regarding proper parties in a partition action.	js		3.90	\$0.00
03/03/2023	[No charge] Continue revising memorandum regarding condominium associations, liens, and bankruptcy.	js		1.80	\$0.00
03/05/2023	Email communications with unit owners and residents regarding rescheduling supervised access to units (0.7); work on revised schedule for supervised access to units (0.8).	MJL	\$350.00	1.50	\$525.00
03/05/2023	Emails with M. Damian, Receiver and P. Valori regarding having Receiver serve as Special Magistrate pursuant to Florida Statutes to permit him to sell the property, seeking entry of Order expanding duties of Receiver to include serving as Special Magistrate, and conducting research to confirm authority for same (.2); review applicable Statute, strategize regarding same, emails with M. Levine regarding research to be done (.4).	KDM	\$550.00	0.60	\$330.00
03/05/2023	Analyze complaint filed in class action lawsuit in preparation of working on motion to show cause and for order compelling compliance with order appointing receiver and motion to stay class action (0.4).	MJL	\$350.00	2.40	\$840.00
03/06/2023	[Reduced time] Managing resident access and recovery of possessions on property (8.5).	og	\$120.00	7.50	\$900.00
03/06/2023	Emails with insurance broker regarding additional financial information needed by insurance carrier to process application for insurance policy for Receiver and professionals, emails with M. Levine regarding same and the Association's financial records, review same, and prepare and send email to broker forwarding additional financial records (.4); emails with broker regarding same and obtaining formal proposal for the second proposed insurance policy, review same, revise the comparison chart for the Receiver, and prepare and send email to Receiver forwarding chart and proposals with explanation regarding same (.4); email from Receiver regarding the proposals and confirming the ratings of one insurance company, further investigate same, and send email to Receiver regarding same (.2); email from Receiver approving proposal from one insurance carrier and discuss with team members binding policy upon obtaining financing, email to Receiver regarding same and obtaining financing to pay for policy, and send email to insurance broker regarding same (.2).	KDM	\$550.00	1.20	\$660.00

03/06/2023	Analyze updated case law regarding tenant standing to sue condominium association in preparation of working on motion to stay class action (0.8); work on motion to stay class action case with focus on argument that plaintiff lacks standing to pursue claims against Association (0.9); analyze fire inspection report to determine inconsistent statements from witnesses on scene on date of incident in preparation of meeting with Receiver via Zoom (0.7); telephone call with E. Connor regarding rescheduling supervised access to unit 205 (0.2); telephone call with K. Pollard regarding retrieved vehicle from property and class action lawsuit (0.4); work on motion to stay class action with focus on argument that litigation should be stayed pending ruling on motion to show cause (0.8); email communications with unit owners regarding supervised access to retrieve personal items (0.3).	MJL	\$350.00	4.10	\$1,435.00
03/06/2023	Review email from private fire inspector.	PFV	\$550.00	0.10	\$55.00
03/06/2023	Email with fire investigator.	PFV	\$550.00	0.30	\$165.00
03/06/2023	Review permitting records regarding roof repair.	PFV	\$550.00	0.40	\$220.00
03/06/2023	Call with fire investigator.	PFV	\$550.00	0.20	\$110.00
03/06/2023	Additional call with fire inspector.	PFV	\$550.00	0.20	\$110.00
03/06/2023	Review Paragon quotes regarding debris removal and demolition.	PFV	\$550.00	0.20	\$110.00
03/06/2023	Draft email regarding same.	PFV	\$550.00	0.20	\$110.00
03/06/2023	Review research memorandum regarding condo liens.	PFV	\$550.00	0.30	\$165.00
03/06/2023	Email to and from receiver's office and P. Valori regarding weekly owners' meeting and Legal Team meeting with receiver (.2); email to D. Bissell regarding upcoming owners' meeting and website (.1); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); begin search of mortgages and liens on units (.6).	rs	\$100.00	1.20	\$120.00
03/07/2023	Further email to M. Levine regarding research on Special Magistrate issue, provide further input regarding same, and schedule call to discuss.	KDM	\$550.00	0.20	\$110.00
03/07/2023	Work on motion to approve loan agreement (0.9); investigation into H. Myrtill via Lexis Accurint in preparation of working on demand letter to him (0.3); same as to E. Phillips in preparation of same (0.4); same as to DJTH, LLC in preparation of same (0.3); same as to Elite Innovation Constructions Inc. in preparation of same (0.4); analyze insurance policies in preparation of potential recovery of policy limits (0.4); work on proposed order approving Receiver's motion for approval of loan certificate (0.6).	MJL	\$350.00	3.30	\$1,155.00
03/07/2023	Email with E. Thompson and Receiver regarding approval of finding of untenability motion.	PFV	\$550.00	0.20	\$110.00
03/07/2023	Email with Jesmany Jomarron regarding membership meeting and related notice of meeting and content.	PFV	\$550.00	0.20	\$110.00
03/07/2023	Research regarding Elite Innovation, Inc. contractor of record regarding roofing work regarding potential claims.	PFV	\$550.00	0.40	\$220.00

03/07/2023	Research regarding DJTH, LLC , payee and user of Elite license to performed work regarding potential claims.	PFV	\$550.00	0.50	\$275.00
03/07/2023	Research regarding Mr. Myrtill, manager of DJTH, LLC and notary on notice of commencement document regarding potential claims.	PFV	\$550.00	0.40	\$220.00
03/07/2023	Draft status report regarding fire inspection report and claims/inspection notice.	PFV	\$550.00	0.50	\$275.00
03/07/2023	Call with building official regarding request by City for trash removal.	PFV	\$550.00	0.10	\$55.00
03/07/2023	Call with O. Garcia regarding same.	PFV	\$550.00	0.10	\$55.00
03/07/2023	Email regarding form of receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/07/2023	Work on preparation of receivership certificates.	PFV	\$550.00	0.30	\$165.00
03/07/2023	Preliminary review of CGL policy regarding claims as to property damage and analysis of same.	PFV	\$550.00	0.80	\$440.00
03/07/2023	Status email with Receiver regarding insurance claims and meeting to discuss claims analysis.	PFV	\$550.00	0.20	\$110.00
03/07/2023	Review and revise motion to approve receivership certificates.	PFV	\$550.00	0.40	\$220.00
03/07/2023	Email regarding possible zoning analysis.	PFV	\$550.00	0.20	\$110.00
03/07/2023	Review and revised order to show cause as to class action plaintiff and counsel.	PFV	\$550.00	0.20	\$110.00
03/07/2023	Review correspondence with counsel in class action case regarding meet and confer.	PFV	\$550.00	0.10	\$55.00
03/07/2023	Conference with project manager regarding status of move outs, and waste removal company request.	PFV	\$550.00	0.20	\$110.00
03/07/2023	[Reduced time] Managing resident access and recovery of possessions on property (8.5).	og	\$120.00	7.50	\$900.00
03/08/2023	Telephone call with counsel for R. Castro regarding insurance adjusters visit to property (0.2); meeting with Receiver via Zoom concerning status and potential next steps (1.5); analyze condominium documents to determine whether partition is necessary if vote to repair is not made (0.3); analyze updated case law regarding receiver's appointment as special master in partition action in preparation of potential need for partition of property due to casualty (0.9); attend meeting with unit owners via zoom to provide updates concerning case (1.7); telephone call with V. Higgs regarding procedure for sale (0.6); email communications with J. Zaga regarding rescheduling visit for supervised access (0.3); email communications with adjuster regarding access to unit (0.2).	MJL	\$350.00	5.70	\$1,995.00
03/08/2023	Revising documents on financing (.3); reviewing and revising motion and proposed order regarding same (.5); telephone calls with counsel for lender (.3); meeting with legal team regarding pending issues (1.4).	MME	\$550.00	2.50	\$1,375.00
03/08/2023	[Reduced time] Managing resident access and recovery of possessions on property (8.5).	og	\$120.00	7.50	\$900.00

03/08/2023	Emails and discuss with M. Levine her research on Special Magistrate issue, the requirements under the Association's Declaration, whether the entire property can be sold, and related matters, review portions of Declaration, and provide further direction regarding same (.8); email to M. Damian regarding the status of research and analysis of issue (.1).	KDM	\$550.00	0.90	\$495.00
03/08/2023	Review proposed order on issuance of receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/08/2023	Email regarding potential buyer inquiry.	PFV	\$550.00	0.10	\$55.00
03/08/2023	Email to and from Pat Brinson regarding New World Condominium.	PFV	\$550.00	0.10	\$55.00
03/08/2023	Conference with Denise Brooks regarding factual background.	PFV	\$550.00	0.30	\$165.00
03/08/2023	Conference with M. Damian regarding insurance issues and potential claims and defenses and review policies.	PFV	\$550.00	0.40	\$220.00
03/08/2023	Conference with J Mazer regarding preliminary insurance issues regarding CGL policies.	PFV	\$550.00	0.30	\$165.00
03/08/2023	Conference with law clerk regarding research regarding CAM manager duties.	PFV	\$550.00	0.20	\$110.00
03/08/2023	Prepare for (.2); and attend (1.5); conference with Receiver and legal team regarding termination notice, fundraising, fire inspection, contractor demand, class action complaint, insurance analysis, communications with buyers, trash removal, and adjuster access.	PFV	\$550.00	1.70	\$935.00
03/08/2023	Prepare for (.1); and attend (1.6); conference with unit owners regarding status termination issues, fundraising, assessment payments and other association updates and matters.	PFV	\$550.00	1.70	\$935.00
03/08/2023	Conference with Mr. Higgs regarding move out and potential sale questions.	PFV	\$550.00	0.30	\$165.00
03/08/2023	Email with project manager regarding status of move out.	PFV	\$550.00	0.20	\$110.00
03/08/2023	Conference regarding waste removal contract.	PFV	\$550.00	0.20	\$110.00
03/08/2023	Draft email regarding insurance policy analysis.	PFV	\$550.00	0.30	\$165.00
03/08/2023	Draft Receiver's Initial Report.	js	\$150.00	3.40	\$510.00
03/08/2023	Review and respond to emails from owners (.2); return call to owners with inquiries (.2); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); continue search of mortgages and liens on units (1.0).	rs	\$100.00	1.80	\$180.00

03/09/2023	Analyze 2018, 2019, and 2020 tax returns in preparation of working on litigation plan for potential clawbacks (0.3); telephone call with D. Lueje regarding status update (0.6); telephone call with A. Hayes and A. Ali regarding help for those living in shelters (0.7); email communications with Building Official regarding unit 116 (0.1); email communications with property management company for several units regarding update on last night's meeting (0.1); telephone call with real estate attorney regarding notices regarding section 12.8 of condominium documents and meeting regarding same in preparation of same (0.9); email communications with property management company regarding Association's contract with roofers (0.2); work on summary on conversation with A. Hayes and A. Ali for receiver (0.3); analysis of Miami-Dade Fire Report to determine conflicting eyewitness statements on date of incident (0.3); analyze documents and photos provided by H. Meshel in preparation of determining whether to file clawback action (0.3).	MJL	\$350.00	3.80	\$1,330.00
03/09/2023	Review portions of law applicable to partition suits and appointment of Special Magistrates and exchange emails and further discuss with P. Valori certain provisions of the Association's Declaration, whether to commence a partition action, having Special Magistrate appointed, and applicable law.	KDM	\$550.00	0.30	\$165.00
03/09/2023	Email with Jesmany.	PFV	\$550.00	0.30	\$165.00
03/09/2023	Call with Jesmany regarding notice of meeting and implementation of provisions under the documents.	PFV	\$550.00	0.70	\$385.00
03/09/2023	Conference with J. Seara regarding reseach regarding partition actions.	PFV	\$550.00	0.20	\$110.00
03/09/2023	Conference with fire inspection expert.	PFV	\$550.00	0.30	\$165.00
03/09/2023	Conference with T. Culmo regarding demand to roofing contractor.	PFV	\$550.00	0.30	\$165.00
03/09/2023	Review email regarding roofer presence on site on day of fire.	PFV	\$550.00	0.20	\$110.00
03/09/2023	Telephone conference with New World tenant.	js	\$150.00	0.10	\$15.00
03/09/2023	Research regarding various issues concerning a community association manager under Florida law.	js	\$150.00	0.90	\$135.00
03/09/2023	Review and respond to emails from owners (.2); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); continue search of mortgages and liens on units (2.0); meeting with J. Seara regarding same (.3).	rs	\$100.00	1.30	\$130.00
03/10/2023	Call with fire causation expert.	PFV	\$550.00	0.20	\$110.00
03/10/2023	Call with appraiser.	PFV	\$550.00	0.30	\$165.00
03/10/2023	Email regarding appraiser and construction estimate.	PFV	\$550.00	0.30	\$165.00
03/10/2023	Conference regarding various issues concerning a community association manager under Florida law.	js	\$150.00	0.50	\$75.00
03/10/2023	[No charge] Continue research regarding various issues concerning a community association manager under Florida law.	js		4.70	\$0.00

03/10/2023	Review and respond to emails from owners (.2); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); continue search of mortgages and liens on units (1.8).	rs	\$100.00	2.40	\$240.00
03/11/2023	Review contract with appraiser.	PFV	\$550.00	0.10	\$55.00
03/11/2023	Email with receiver regarding status and with appraiser regarding commencement of work.	PFV	\$550.00	0.10	\$55.00
03/11/2023	Review and revise notice of meeting (.3); and draft status report and proposed plan for next steps as to member meeting (.4).	PFV	\$550.00	0.70	\$385.00
03/12/2023	Work on notice to unit owners regarding meeting related to section 12.8 of the condominium declaration in preparation of mailing same (0.2); email communications with D. Heimberger regarding posting same to website (0.1).	MJL	\$350.00	0.30	\$105.00
03/12/2023	Review notice requirements and calls and email regarding same.	PFV	\$550.00	0.20	\$110.00
03/12/2023	Email with appraiser regarding land value request for information and work on response.	PFV	\$550.00	0.20	\$110.00
03/12/2023	Email regarding estimator request for information regarding potential cost of repairs.	PFV	\$550.00	0.30	\$165.00
03/12/2023	Telephone conference with P. Valori and M. Levine regarding members meeting (.3); prepare mailing to all unit owners at all known addresses enclosing notice of members' meeting (3.0).	rs	\$100.00	3.30	\$330.00
03/13/2023	Email communications with Building Official regarding estimator for potential repair cost and an appraiser of the value in the event that repairs are not made (0.1); email communications with J. Jomarron regarding same (0.1); telephone call with D. Brooks regarding Exhibit A to her employment agreement as well as roofing contract (0.2).	MJL	\$350.00	0.80	\$280.00
03/13/2023	Meeting with counsel and Receiver regarding status and strategy of open matters.	MME	\$550.00	0.60	\$330.00
03/13/2023	Telephone call with owner of unit 225/226 and his daughter regarding updates on retrieving personal items from unit and vehicles from property (0.3); telephone call with same unit owner's children regarding same (0.2); email communications with Building Official regarding authority for same to pick up vehicles from property in preparation of same (0.1); telephone call with security company regarding same (0.1); communications with same unit owner's children regarding same (0.1); telephone call with security company regarding estimator and appraiser's access to the property (0.2); email communications with J. Jomarron regarding same (0.2); telephone call with B. Lyle with the red cross regarding assistance for unit owners and tenants (0.3); email communications with same regarding same (0.1); email communications with unit owners regarding access to units (0.9).	MJL	\$350.00	2.50	\$875.00
03/13/2023	Meeting with receiver regarding status and planning.	PFV	\$550.00	0.60	\$330.00
03/13/2023	Review memorandum regarding CAM manager potential liability.	PFV	\$550.00	0.30	\$165.00

03/13/2023	Review follow up request for documents.	PFV	\$550.00	0.20	\$110.00
03/13/2023	Work on demand letter to All City.	PFV	\$550.00	0.40	\$220.00
03/13/2023	Email with fire investigator regarding coordination of excavation.	PFV	\$550.00	0.20	\$110.00
03/13/2023	Review email from Building Official regarding property inspections by appraiser and estimator.	PFV	\$550.00	0.10	\$55.00
03/13/2023	Review email regarding double payment on unit # 201.	PFV	\$550.00	0.10	\$55.00
03/13/2023	Draft proposed response regarding double payment on unit # 201.	PFV	\$550.00	0.10	\$55.00
03/13/2023	Preliminary review of 2018-2020 tax returns.	PFV	\$550.00	0.30	\$165.00
03/13/2023	Review and respond to emails from owners (.2); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); email to P. Valori regarding weekly owners' meeting (.2); email to O. Garcia regarding posting of notice of members' meeting on property (.1) continue search of mortgages and liens on units (1.0).	rs	\$100.00	1.90	\$190.00
03/14/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	6.50	\$780.00
03/14/2023	Work on Receiver's initial report with focus on introduction section (0.3); same with focus on section regarding Receiver's duties and powers under the Order Appointing Receiver (0.3); same with focus on factual background section (0.6); analyze bank statements from December 2022 to March 2023 to determine whether insurance attempted ACH payments (0.4); email communications with D. Brooks regarding Exhibit A of Prestige's contract and roofing contract (0.1); analyze same to determine potential liability (0.4); analyze photos from fire to determine whether roofers statements regarding hot tar are accurate (0.3); work on memorandum regarding same (0.3); telephone call with E. Connor regarding rescheduling retrieval of personal items (0.6); communications with A. Hayes regarding A/C electrical issues prior to date of incident (0.1); analyze text messages and photos regarding same in preparation of working on memorandum to private forensic fire inspector regarding same (0.1); work on memorandum to private forensic fire inspector regarding same (0.7); investigation into former ownership of property management company in preparation of determining potential liability of third parties (0.2); email communications with Building Official regarding authorization for K. Green to remove vehicles from the Property (0.1); telephone call with O. Garcia regarding Building Official's authorization regarding same (0.1).	MJL	\$350.00	4.60	\$1,610.00
03/14/2023	Meeting with Truist to take over bank account and transfer funds.	MME	\$550.00	1.00	\$550.00
03/14/2023	Conference with building official regarding status and fire inspection regarding forensic examiners.	PFV	\$550.00	0.30	\$165.00
03/14/2023	Conferences with M. Levine and M. Damian regarding Truist account take over and insurance premiums due.	PFV	\$550.00	0.30	\$165.00
03/14/2023	Additional email regarding roofer contract.	PFV	\$550.00	0.10	\$55.00
03/14/2023	Conference regarding license number listed on contract.	PFV	\$550.00	0.10	\$55.00

03/14/2023	Review email regarding roofer work on as to Ms. Hayes's unit.	PFV	\$550.00	0.40	\$220.00
03/14/2023	[No charge] Review and respond to emails from owners (.2); review owner questionnaire forms (.2); update spreadsheet regarding same (.2); finalize letter to All City Insurance (.1); email to receiver's office regarding upcoming owners' meeting (.1); continue search of mortgages and liens on units (2.0).	rs		2.80	\$0.00
03/15/2023	Work on list of insurance adjusters who are seeking access to units on the property (0.3); same for list of insurers for individual units (0.2); communications with L. Aguila regarding maintenance man referenced in the fire inspection report (0.2); strategy regarding potential third party claims and defenses to same (0.4); telephone conference with A. Hayes, A. Ali, and P. Valori regarding government and private assistance for tenants and unit owners (0.9); email communications with K. Ladis regarding same (0.1); analyze signed roofing contract in preparation of working on demand letter (0.2).	MJL	\$350.00	2.30	\$805.00
03/15/2023	Call with units owners regarding request for report as to available funds.	PFV	\$550.00	0.90	\$495.00
03/15/2023	Email with Val Rohette, adjuster regarding unit # 244.	PFV	\$550.00	0.30	\$165.00
03/15/2023	Review adjuster summary chart and draft email regarding same.	PFV	\$550.00	0.20	\$110.00
03/15/2023	Email with attorney for unit # 114 insurer regarding request for inspection and related matters.	PFV	\$550.00	0.30	\$165.00
03/15/2023	Review demand letter from laundry equipment rental company.	PFV	\$550.00	0.20	\$110.00
03/15/2023	Draft response email to laundry equipment rental company.	PFV	\$550.00	0.20	\$110.00
03/15/2023	Draft status report to receiver.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Review background information regarding Prestige.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Draft status report regarding background information regarding Prestige.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Work on roofing insurance company demand letter.	PFV	\$550.00	0.50	\$275.00
03/15/2023	Review email from Building Official regarding car retrieval.	PFV	\$550.00	0.20	\$110.00
03/15/2023	Review appraiser inquiry with City regarding development potential.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Review executed roofer contact.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Draft email regarding same.	PFV	\$550.00	0.10	\$55.00
03/15/2023	Preliminary review of repair estimate.	PFV	\$550.00	0.40	\$220.00
03/15/2023	Conferences regarding same.	PFV	\$550.00	0.20	\$110.00
03/15/2023	Call with estimator and outside counsel regarding repair estimate.	PFV	\$550.00	0.30	\$165.00
03/15/2023	Working with new lender to borrow \$400k.	MME	\$550.00	0.60	\$330.00
03/15/2023	Research and collect documents regarding liens and mortgages on New World Condominium units.	js	\$150.00	0.70	\$105.00

03/15/2023	Review owner questionnaire forms (.2); update spreadsheet regarding same (.2); email to M. Damian regarding status of mortgage and lien searches (.2); continue search of mortgages and liens on units (2.0).	rs	\$100.00	2.60	\$260.00
03/15/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	7.00	\$840.00
03/16/2023	Work on demand letter to roofing company's insurer with focus on revisions to same (0.4); analyze receivables in preparation of communications with D. Brooks regarding same (0.2); analyze requests for adjusters to inspect units and work on list regarding same in preparation of communications with Building Official regarding access to units (0.8); email communications with adjusters in preparation of same (0.2); email communications with D. Brooks regarding nonpayment of insurance (0.1).	MJL	\$350.00	1.70	\$595.00
03/16/2023	Call with Melanie regarding planning as to insurance claim and treatment of funds recovered, response to class action counsel, and roofer claims.	PFV	\$550.00	0.40	\$220.00
03/16/2023	Call with forensic fire examiner regarding status and planned dig out.	PFV	\$550.00	0.20	\$110.00
03/16/2023	Draft response to bookkeeper questions regarding unit owner accounts.	PFV	\$550.00	0.40	\$220.00
03/16/2023	Email regarding status and revisions to roofer demand letter.	PFV	\$550.00	0.40	\$220.00
03/16/2023	Review bookkeeper questions regarding unit owner accounts.	PFV	\$550.00	0.20	\$110.00
03/16/2023	Research regarding record title interest regarding naming parties for partition action.	js	\$150.00	8.40	\$1,260.00
03/16/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	7.00	\$840.00
03/17/2023	Email communications with D. Brooks regarding insurance (0.1); analyze account statements provided by D. Brooks in preparation of sending updated statements to unit owners for the month of March (0.4); email communications with the Receiver regarding payment to insurance company (0.1).	MJL	\$350.00	0.60	\$210.00
03/17/2023	Email with M. Damian regarding receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/17/2023	Call potential lender's counsel regarding same.	PFV	\$550.00	0.20	\$110.00
03/17/2023	Review payment confirmation information regarding insurance premium.	PFV	\$550.00	0.10	\$55.00
03/17/2023	Review file and call with receiver regarding status.	PFV	\$550.00	0.20	\$110.00
03/17/2023	Call with forensic fire investigator.	PFV	\$550.00	0.20	\$110.00
03/17/2023	Work on demand letter to roofing contractor insurance company.	PFV	\$550.00	0.30	\$165.00
03/17/2023	Email with insurance company.	PFV	\$550.00	0.20	\$110.00
03/17/2023	Email with management company.	PFV	\$550.00	0.30	\$165.00
03/17/2023	Review email regarding call from Mr. Baptiste.	PFV	\$550.00	0.20	\$110.00
03/17/2023	Email with forensic fire investigator.	PFV	\$550.00	0.30	\$165.00

03/17/2023	Telephone call with counsel for lender and reviewing new documents.	MME	\$550.00	0.40	\$220.00
03/17/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	7.00	\$840.00
03/18/2023	Update list of adjusters in preparation of working on plan for adjusters to inspect units (0.3); work on plan for adjusters to inspect units (0.4).	MJL	\$350.00	0.70	\$245.00
03/18/2023	[No charge] Email with outside condominium law counsel regarding retention and fee application.	PFV		0.20	\$0.00
03/18/2023	Email with forensic fire examiner.	PFV	\$550.00	0.20	\$110.00
03/19/2023	Review repair estimate.	PFV	\$550.00	0.40	\$220.00
03/19/2023	Draft email to receiver regarding status.	PFV	\$550.00	0.20	\$110.00
03/20/2023	Telephone call with L. Baptiste regarding documents and updates on retrieving personal items from unit (0.2); email communications with D. Heimberger regarding posting appraisal report and estimate report to website (0.2); work on Receiver's initial report with focus on work which has been performed (1.3); same with focus on conclusion (0.7); work on Receiver's motion to approve loan certificate (0.1); work on loan certificate to be attached to same (0.1); work on proposed order to be attached to same (0.1).	MJL	\$350.00	2.70	\$945.00
03/20/2023	Review appraisal report regarding property.	PFV	\$550.00	0.30	\$165.00
03/20/2023	Draft status report regarding same.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Draft email regarding website posting.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Review updated website.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Draft update email to building official.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Call with Receiver regarding status and planning.	PFV	\$550.00	0.80	\$440.00
03/20/2023	Work on motion to approve receiver certificates.	PFV	\$550.00	0.30	\$165.00
03/20/2023	Review and revise order regarding approval of receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Email with receiver regarding motion to approve receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/20/2023	Telephone conference with A. Ruff regarding upcoming weekly owners' meeting and Legal Team meeting (.3); email to P. Valori regarding same (.1); telephone conference with M. Levine and P. Valori (.2); continue search of mortgages and liens on units (2.5); email to D. Bissell regarding upcoming owners' meeting and website (.2);	rs	\$100.00	3.30	\$330.00
03/20/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	7.00	\$840.00

03/21/2023	Email communications with M. Zaga regarding crediting her account for overpayment (0.1); email communications with T. Tinil regarding access to her unit (0.1); email communications with E. Chavarria regarding payment history (0.1); email communications with insurance adjusters regarding necessary authorization prior to inspection of units (0.2); email communications with A. Henderson regarding supervised access to unit (0.1); telephone call with H. Green regarding retrieving vehicles from property (0.1); analyze financial statements in preparation of communications with D. Brooks regarding financial accounting (0.4); email communications with D. Brooks regarding same (0.1); analyze documents provided by L. Baptiste to determine viability of potential claims (0.2); communications with D. Mason regarding roofing permit and roofing contract (0.2); analyze court filings in class action case to determine whether any defendants have been served in class action case (0.1).	MJL	\$350.00	1.70	\$595.00
03/21/2023	Draft email regarding response to request for account information.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Conference regarding status of move outs and waste removal.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Conference regarding denial of request for expedited hearing date on motion to approve receivership certificates.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Draft email regarding receivership certificate approval.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Email regarding insurance contract review.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Review file and call with adjuster for roofer's insurance company.	PFV	\$550.00	0.50	\$275.00
03/21/2023	Prepare information package for adjuster.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Review MDC fire report.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Email with insurance company's forensic fire investigator.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Email with Building Official regarding access for two FFIs for roofer.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Email regarding report and requested payment of pre-receivership engineer.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Additional emails and consultation with fire investigator.	PFV	\$550.00	0.40	\$220.00
03/21/2023	Review email regarding account records transfer.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Review motion to withdraw.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Draft status email to receiver.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Review email regarding J. Baptiste documents.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Draft response email regarding same.	PFV	\$550.00	0.10	\$55.00
03/21/2023	Additional correspondence with insurance company representatives.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Prepare hold harmless agreement and release.	PFV	\$550.00	0.40	\$220.00
03/21/2023	Draft multiple emails regarding hold harmless agreement and release.	PFV	\$550.00	0.20	\$110.00

03/21/2023	Email regarding hearing on motion for receivership certificates.	PFV	\$550.00	0.20	\$110.00
03/21/2023	Continue research and collection of documents regarding liens and mortgages on New World Condominium units.	js	\$150.00	1.50	\$225.00
03/21/2023	Continue search of mortgages and liens on units (3.0); telephone conference with JA for Judge Lopez regarding hearing on motion to approve loan certificate (.2); telephone conference with M. Levine (.1); email to P. Valori and M. Levine regarding same; review court file regarding class action lawsuit (.2); review owner questionnaire form (.1) update spreadsheet regarding same (.2).	rs	\$100.00	3.80	\$380.00
03/21/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	7.00	\$840.00
03/22/2023	Work on litigation plan concerning potential claims against property management company.	MJL	\$350.00	0.40	\$140.00
03/22/2023	Conference with Building Official regarding status of property inspection and request for information regarding Elite Innovation.	PFV	\$550.00	0.30	\$165.00
03/22/2023	Email regarding information exchange as to Elite Innovation contract.	PFV	\$550.00	0.10	\$55.00
03/22/2023	Email regarding information exchange regarding electrical work performed.	PFV	\$550.00	0.20	\$110.00
03/22/2023	Work on analysis of factual background regarding actions of management company regarding association affairs.	PFV	\$550.00	0.40	\$220.00
03/22/2023	Draft email to Captain Forrester regarding additional information regarding property.	PFV	\$550.00	0.20	\$110.00
03/22/2023	Email regarding non-opposition to motion to withdraw by Mr. Baptiste's counsel.	PFV	\$550.00	0.10	\$55.00
03/22/2023	Review memorandum regarding appointment of the receiver as a special magistrate in a partition action and analysis reasoning for appointment and potential sale procedures.	PFV	\$550.00	1.00	\$550.00
03/22/2023	Work on shell for partition complaint and structure of naming parties and properties.	PFV	\$550.00	0.40	\$220.00
03/22/2023	Continue research and collection of documents regarding liens and mortgages on New World Condominium units.	js	\$150.00	1.10	\$165.00
03/22/2023	Complete search of mortgages and liens on units (2.5); review and make edits to spreadsheet regarding same (.5); telephone conference with M. Levine (.1); email to and from opposing counsel coordinating hearing on motion to approve loan certificate and Plaintiff's motion to withdraw as counsel (.2); draft, finalize, file and submit to Judge request for special set hearing and notice of hearing on motion to approve loan certificate (.3); telephone conference with A. Ruff regarding hearing on motion to approve loan certificate (.2); meeting with P. Valori regarding mortgage and lien searches, adding lis pendens to search and strategy regarding partition suit (.3); emails to and from J. Seara regarding additional searches (.2)	rs	\$100.00	4.30	\$430.00

03/22/2023	[Reduced time] Managing resident access and recovery of possessions on property (7.0).	og	\$120.00	6.00	\$720.00
03/23/2023	Conference with Melanie regarding status and planing.	PFV	\$550.00	0.40	\$220.00
03/23/2023	Prepare for (.2); and attend (1.8); Zoom meeting with unit owners and Post meeting conference with M. Levine regarding follow up items (.2).	PFV	\$550.00	2.20	\$1,210.00
03/23/2023	Email with Building Official regarding access for passport regarding unit # 236.	PFV	\$550.00	0.20	\$110.00
03/23/2023	Research and Collection of court documents regarding New World Condominium Unit owners.	js	\$150.00	2.80	\$420.00
03/23/2023	Work on Receiver's initial report with focus on updated plan (0.7); same with focus on section regarding loan certificate (0.4); telephone call with unit owner regarding retrieving personal belongings from unit (0.4); analyze method in which unit owners should vote for repairs in preparation of meeting with unit owners (0.6); meet with unit owners via Zoom to provide updates on estimated cost to repair property and appraisal of vacant land, among other things (1.9); email communications with O. Diaz regarding owner of unit 236's request to retrieve passport from unit (0.2); email communications with Red Cross regarding N. Lau (0.1); analyze declaration of condominium with focus on percentages of ownership interest in preparation of working on chart as to same (0.3); work on chart of unit owners and percentage of ownership in preparation of working on partition action (0.7).	MJL	\$350.00	5.30	\$1,855.00
03/23/2023	[No charge] Emails to and from opposing counsel regarding hearing on motion to approve loan certificate and Plaintiff's motion to withdraw (.1); email to P. Valori regarding same (.1); conference with J. Seara regarding lis pendens search for each unit (.2); begin search of lis pendens and releases for each unit (1.0).	rs		1.40	\$0.00
03/24/2023	Email with class action lawyers regarding complaint for damages.	PFV	\$550.00	0.10	\$55.00
03/24/2023	Conference with M. Levine regarding CAM licensure issues.	PFV	\$550.00	0.30	\$165.00

03/24/2023	Email communications with D. Bissell Heimberger regarding posting ownership percentages on website (0.1); analyze lis pendes and foreclosure actions in preparation of working on complaint for partition action (0.9); analyze updated case law regarding statutory requirements for performing community association management services in preparation of same (1.1); analyze licenses issued to D. Brooks and complaints concerning same via DBPR website in preparation of working on memorandum as to potential liability of property manager (0.3); same for Prestige Management Solutions, Inc. in preparation of same (0.2); same for The Prestige Group of Companies LLC in preparation of same (0.2); analyze updated case law regarding property manager's liability to condominium association in preparation of same (0.8); work on memorandum as to liability of property manager with focus on factual background as to DBPR licensing and licensing complaints for D. Brooks (0.6); same with focus on same as to Prestige (0.6); analyze corporate documents for Prestige Management Solutions, Inc. via Sunbiz to determine officers and directors of same in preparation of continued work on memorandum (0.4); same as to The Prestige Group of Companies LLC to determine same in preparation of same (0.3); analyze public records regarding officers and directors of foregoing entities in preparation of same (0.4); work on memorandum with focus on factual background of corporate entities (0.9).	MJL	\$350.00	6.80	\$2,380.00
03/24/2023	Continue search of lis pendens and releases for each unit (1.5); emails to and from J. Seara regarding searches (.2); telephone conference with A. Ruff regarding upcoming meetings and hearing (.2).	rs	\$100.00	1.90	\$190.00
03/25/2023	Review email from the building official regarding request for access to retrieve passport.	PFV	\$550.00	0.10	\$55.00
03/25/2023	Draft email to M. Levine regarding informing unit owner of denial of request for access.	PFV	\$550.00	0.10	\$55.00
03/25/2023	Email with attorney Dvorak regarding request for forensic fire inspector access and draft response.	PFV	\$550.00	0.20	\$110.00
03/25/2023	Draft update email regarding same.	PFV	\$550.00	0.10	\$55.00
03/25/2023	Work on receiver's initial report.	PFV	\$550.00	1.40	\$770.00
03/25/2023	Review email correspondence regarding adjuster requests for access to property.	PFV	\$550.00	0.30	\$165.00
03/27/2023	Work on Receiver's preliminary report with focus on M. Damian's revisions to same (0.5); email communications with K. Stantz regarding building official denying V. Laguerre's request to obtain his passport (0.1); meet with unit owners regarding right to vote to repair property (1.7).	MJL	\$350.00	2.30	\$805.00
03/27/2023	Reviewing and revising preliminary report.	MME	\$550.00	0.70	\$385.00

03/27/2023	Continue search of lis pendens and releases for each unit (.2.0); emails to and from P. Valori regarding unit owners with deeds granting rights of survivorship for partition suit (.2); email to G. Santa Cruz regarding searching public records for owners granting rights of survivorship (.2); prepare draft notice of appearance on behalf of association in class action lawsuit (.2); review court file for service on association (.1); email to P. Valori regarding same (.1); revise proposed order on motion to approve loan certificate (.1); receipt and review of court notice regarding cancellation of hearing on motion to approve loan certificate (.1); conference with P. Valori regarding same (.2); telephone conference with A. Ruff regarding cancellation (.2)	rs	\$100.00	3.40	\$340.00
03/28/2023	[No charge] Telephone call to JA and proposed order issues (.2); e-mail to lender regarding order approving financing (.2).	MME		0.40	\$0.00
03/28/2023	Conference with M. Damian regarding outcome of informational board meeting (.2); case planning regarding partition action (.2); and fee application (.1).	PFV	\$550.00	0.50	\$275.00
03/28/2023	Email with condominium law counsel and with receiver regarding information needed for fee application.	PFV	\$550.00	0.20	\$110.00
03/28/2023	Review notice of cancellation of hearing.	PFV	\$550.00	0.10	\$55.00
03/28/2023	Draft status report regarding same.	PFV	\$550.00	0.10	\$55.00
03/28/2023	Draft letter to J. Lopez regarding motion to approve bond.	PFV	\$550.00	0.20	\$110.00
03/28/2023	Review and revise order regarding same.	PFV	\$550.00	0.20	\$110.00
03/28/2023	Continue search of lis pendens and releases for each unit (2.5); review Judge's calendar for availability to reset hearing on motion to approve loan certificate (.2); draft, finalize and submit letter to Judge regarding hearing on motion (.3).	rs	\$100.00	3.00	\$300.00
03/29/2023	Email communications with unit owners regarding vote to repair (0.4); email communications with unit owner regarding payment history (0.1); email communications with O. Garcia regarding whether unit owners voted to repair via text message (0.1).	MJL	\$350.00	0.60	\$210.00
03/29/2023	Conference with potential investor regarding request for information regarding opportunity to purchase property.	PFV	\$550.00	0.30	\$165.00
03/29/2023	Review email regarding hearing on Mr. Baptiste's counsel's motion to withdraw.	PFV	\$550.00	0.10	\$55.00
03/29/2023	Zoom conference with class plaintiff's counsel.	PFV	\$550.00	0.50	\$275.00
03/29/2023	Draft email regarding production of CGL policy.	PFV	\$550.00	0.20	\$110.00
03/29/2023	Draft follow up email regarding receiver's preliminary report.	PFV	\$550.00	0.10	\$55.00
03/29/2023	Review email regarding two unit owners voting to make repairs.	PFV	\$550.00	0.20	\$110.00
03/29/2023	Conference with building official regarding status of move out, dissolution, sale, and waste removal.	PFV	\$550.00	0.30	\$165.00
03/29/2023	[No charge] Zoom call with class action counsel (.3); working on finalizing loan (.5).	MME		0.80	\$0.00

03/29/2023	Continue search of lis pendens and releases for each unit (2.0); emails to and from opposing counsel regarding hearing on motion to withdraw as counsel (.2); email to P. Valori regarding same (.1); receipt and review of order granting motion (.1).	rs	\$100.00	2.40	\$240.00
03/30/2023	Continue search of lis pendens and releases for each unit (2.0); email to P. Valori regarding status of same (.1); meeting with P. Valori regarding same and partition suit (.3).	rs	\$100.00	2.40	\$240.00
03/30/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	6.00	\$720.00
03/31/2023	Analyze deeds and liens for units in preparation of working on verified complaint for partition (0.6); investigation into names of corporate owners via Sunbiz in preparation of same (0.8); analyze updated case law concerning partition in preparation of same (0.7); work on verified complaint for partition (1.3).	MJL	\$350.00	3.40	\$1,190.00
03/31/2023	Conference with Omar Garcia regarding status and planning regarding Phase 1 move outs, Florida Power & L equipment removal and plans for Phase 2 move outs.	PFV	\$550.00	0.30	\$165.00
03/31/2023	Conference with M. Levine regarding title issues as to a specific unit as it may relate additional assets of the association and on the partition action.	PFV	\$550.00	0.40	\$220.00
03/31/2023	[No charge] Continue search of lis pendens and releases for each unit (2.0); telephone conference with M. Levine regarding partition suit and exhibits (.3); email to G. Santa Cruz regarding search of units owned by entities and online searches of registered agents and addresses (.3).	rs		2.60	\$0.00
03/31/2023	Managing resident access and recovery of possessions on property.	og	\$120.00	6.00	\$720.00
				518.10	\$143,976.00

Costs & Expenses

Date	Description	Amount
02/08/2023	Miami Dade Fire Rescue Department. Certified Investigation Report and Scene Pictures. 02.08.23	\$54.25
02/09/2023	Postage	\$0.84
02/10/2023	Executive Express. Invoice Number J22530. Hand delivery documents to Truist Bank. 02.10.23	\$19.00
02/13/2023	Receivership Telephone Line	\$37.45
02/13/2023	Phone	\$42.79
02/15/2023	Postage	\$77.40
02/28/2023	Checks for bank account and deposit stamper	\$46.77
02/28/2023	Lexis Nexis Advance Legal Research Fee	\$100.14
02/28/2023	Pacer/ Court Documents	\$1.60
03/08/2023	Postage	\$2.40
03/31/2023	Photocopies	\$0.18

03/31/2023	Webmaster. Domain Purchase, Hosting set up and Renewal for March and April 2023. Create new website, for Services rendered for February and March 2023	\$485.65
03/31/2023	Accurant Research Fee	\$62.84
03/31/2023	Lexis Nexis Advance Legal Research Fee	\$128.13
03/31/2023	Pacer/ Court Documents	\$11.10
		\$1,070.54

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Melanie Damian	MME	22.3	\$550.00	\$9,185.00
Peter Valori	PFV	113.4	\$550.00	\$62,205.00
Morgan Levine	MJL	114.3	\$350.00	\$40,005.00
Omar Garcia	og	143.8	\$120.00	\$17,256.00
Reesea Saetae	rs	64.4	\$100.00	\$5,760.00
Joseph Seara	js	52.3	\$150.00	\$5,385.00
Kenneth Murena	KDM	7.6	\$550.00	\$4,180.00

Invoice Amount:	\$145,046.54
Discount @ 5%:	(\$7,252.33)
All Invoices Amount:	\$137,794.21
Amount Applied:	\$0.00
Balance Due:	\$137,794.21

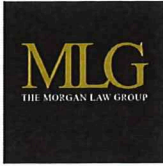


CLICK TO PAY

Visit: <https://rapidpay.us>
Ref: 220136020710

Payments Since Last Invoice

Date	Description	Amount
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INVOICE

Invoice # 86
Date: 03/31/2023
Due On: 04/30/2023

The Morgan Law Group, P.A.

55 Merrick Way, Suite 404
Coral Gables, FL 33134
Phone: (305) 569-9900
www.policyadvocate.com

New World Condominium Apartments Condominium Association, Inc.
1000 Brickell Avenue, Suite 1020
Miami, FL 33131

BLT23-0007 -- Receivership of New World Condominium Apartments Condominium Association Inc. -- Case No. 2023-001716-CA-01

BLT23-0007 -- Receivership of New World Condominium Apartments Condominium Association Inc. -- Case No. 2023-001716-CA-01

Date	Attorney	Notes	Quantity	Total
02/27/2023	JJ	Telephone conference with Peter Valori and Melanie Damian regarding analysis of New World Condo governing documents and need for legal opinion on the term untenable found therein after determination by City of Miami Gardens that the Condominium Property was an unsafe structure.	0.40	\$220.00
03/05/2023	JJ	Performed legal research regarding legal definition of untenable including review of applicable case law and statutes.	1.00	\$550.00
03/05/2023	JJ	Reviewed public records of New World Condo including declaration, bylaws, articles of incorporation, annual filings with the secretary of state, and filings in the receivership court docket.	2.00	\$1,100.00

03/05/2023	JJ	Prepared legal opinion letter regarding term untenable within the context of the governing documents of New World Condominium Apartments Condominium Association, Inc.	2.20	\$1,210.00
03/08/2023	JJ	Reviewed and analyzed New World Condo governing documents and applicable Florida Statute governing terminations of condominiums.	1.00	\$550.00
03/08/2023	JJ	Performed legal research on proper procedure for termination of condominium and notice to members.	1.40	\$770.00
03/08/2023	JJ	Prepared first draft of Notice to Members of Proposed Plan of Termination.	0.40	\$220.00
03/09/2023	JJ	Electronic mail correspondence to P. Valori requesting copies of repair proposal and proposed plan of termination pursuant to section 718.117, Florida Statutes.	0.10	\$55.00
03/09/2023	JJ	Telephone conference with P. Valori and Morgan Levine reviewing and analyzing the New World Condo governing documents and applicable Florida law to decide best approach for notice to members of their right under Article 12.8 of the Declaration.	0.80	\$440.00
03/09/2023	JJ	Telephone conference with Lester Martinez of Vanguard Construction Services to consult regarding his service as an expert witness to prepare a detailed estimate of damages and costs to rebuild the New World Condominium Property damaged by the fire on an expedited basis.	0.20	\$110.00
03/09/2023	JJ	Electronic mail correspondence to P. Valori, M. Levine, and M. Damian regarding cost for Lester Martinez's services and projected completion date.	0.10	\$55.00
03/09/2023	JJ	Revised and finalized Notice of Member Meeting regarding automatic termination and members' right to repair and avoid termination.	0.80	\$440.00
03/10/2023	JJ	Electronic mail correspondence to P. Valori, M. Levine, and M. Damian enclosing Notice of Member Meeting.	0.10	\$55.00
03/10/2023	JJ	Exchanged electronic mail correspondence with	0.20	\$110.00

		P. Valori regarding the approval by Receiver Judge Gersten (ret.) to retain expert estimator Lester Martinez of Vanguard Construction to prepare detailed estimate of the cost to repair the New World Condominium Property after the fire.		
03/10/2023	JJ	Attend to coordinating inspection of New World Condominium Property with expert estimator and city building official.	0.50	\$275.00
03/11/2023	JJ	Received and reviewed electronic mail correspondence from P. Valori enclosing revised notice of member meeting and legal analysis supporting revisions.	0.40	\$220.00
03/11/2023	JJ	Received and reviewed electronic mail correspondence from M. Damian approving proposed Notice of Member Meeting.	0.10	\$55.00
03/12/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) approving revised Notice of Member Meeting.	0.10	\$55.00
03/12/2023	JJ	Performed legal research to ensure proper procedures and notice requirements for member meeting including review of Bylaws, Declaration, and applicable provisions of Chapter 720.	0.60	\$330.00
03/12/2023	JJ	Prepared comprehensive electronic mail correspondence to P. Valori, M Damian, M. Levine, and Receiver Judge Gersten (ret.) approving revised notice of member meeting and enclosing legal analysis supporting same.	0.40	\$220.00
03/13/2023	JJ	Multiple telephone conferences with expert estimator L. Martinez regarding inspection of New World Condominium Property.	0.50	\$275.00
03/13/2023	JJ	Exchanged electronic mail correspondence with M. Levine and P. Valori regarding proposed delivery of detailed estimate of costs for repairs.	0.20	\$110.00
03/16/2023	JJ	Telephone conference with L. Martinez, expert estimator, regarding details of report on the damages to the New World Condominium property.	0.20	\$110.00
03/16/2023	JJ	Reviewed and analyzed report prepared by L.	0.80	\$440.00

		Martinez detailing estimate of costs to repair New World Condominium property.		
03/16/2023	JJ	Exchanged electronic mail correspondence with P. Valori, M. Levine, and M. Damian conveying link to large 900+ page report of L. Martinez, detailing costs of repairs to the New World Condominium property.	0.20	\$110.00
03/16/2023	JJ	Received and reviewed electronic mail correspondence from P. Valori regarding scope of report including areas of the New World Condominium property that outside the common areas.	0.10	\$55.00
03/16/2023	JJ	Reviewed and analyzed applicable Florida law to confirm exact scope of common areas and association responsibility for repairs.	0.20	\$110.00
03/16/2023	JJ	Telephone conference with L. Martinez regarding scope of repairs described in expert report and confirming only commons areas may be included as required by Florida law.	0.20	\$110.00
03/16/2023	JJ	Telephone conference with P. Valori reviewing and analyzing expert report prepared by L. Martinez detailing costs of repairs to the New World Condominium property.	0.20	\$110.00
03/17/2023	JJ	Telephone conference with P. Valori and L. Martinez reviewing and analyzing expert report detailing costs of repairs to the New World Condominium Property.	0.40	\$220.00
03/19/2023	JJ	Multiple communications and a telephone conference with L. Martinez regarding revised estimate for repairs to New World Condominium Property.	0.30	\$165.00
03/19/2023	JJ	Received and reviewed revised estimate of repairs to New World Condominium property.	0.20	\$110.00
03/19/2023	JJ	Conveyed copy of Vanguard Final Detailed Estimate of repairs to New World Condominium Property.	0.10	\$55.00
			Subtotal	\$9,020.00
			Total	\$9,020.00

Please make all amounts payable to: The Morgan Law Group, P.A.

Please pay within 30 days.

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") for the period from February 7, 2023 through March 31, 2023 (the "Application Period") 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 during the Application Period, 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: Fees in the total amount of \$32,860.00 (after being reduced as set forth in the Application);
- (b) Damian | Valori | Culmo, as Lead Counsel to the Receiver: Fees in the amount of \$143,976.00 and costs in the amount of \$1,070.54, for a total of \$137,794.21 (after being reduced by five percent (5%) and otherwise reduced as set forth in the Application); and
- (c) The Morgan Law Group, as Special Counsel to the Receiver: Fees in the total amount of \$9,020.00 (after being reduced as set forth in the Application).

3. The Receiver is authorized to use funds in account(s) of the New World Condominium Apartments Condominium Association, Inc. to pay the foregoing fees and costs of the Receiver and his professionals.

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

CIRCUIT COURT JUDGE

Copies to all Counsel of Record