

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 FOURTH REPORT AND APPLICATION FOR ORDER AUTHORIZING
PAYMENT OF FEES AND EXPENSES**

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

I. Summary of the Receiver's Activities.

A. Employment of Professionals.

The Receiver continues to engage the following professionals referenced in his Preliminary Report [D.E. 23], Second Report [D.E. 29], and Third Report [D.E. 40], including (i) his law firm, Gordon Rees Scully Mansukhani LLP ("GRSM"), (ii) Damian | Valori | Culmo as lead counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association ("Lead Counsel"), and (iii) an experienced real estate lawyer, Richard ("Rick") Zelman, Esq., through his law firm, Sacher Zelman Hartman, P.A., to assist in title related matters concerning the partition action described *infra* ("Special Counsel"). Since the Receiver filed his

Third Report [D.E. 40], the Receiver engaged an experienced insurance coverage law firm, Cimo Mazer Mark PLLC, to assist with matters concerning insurance of the Association and resolution of the *Thomas* case as referenced below as to any claims as to Association assets (“Insurance Counsel”).

The foregoing professionals have been instrumental to the Receiver’s success in this case for the reasons set forth in the Receiver’s prior reports [D.E. 23, 29, 40], as well as their continued assistance in evaluating the Association’s rights and obligations, investigating and pursuing the Association’s claims, defending claims against the Association, operating the Association on an interim basis, determining the estimated and/or potential value of the Receivership Estate (*i.e.* matters impacted by the value of the condominium property), communicating with the unit owners/residents of the Association, adjusters, creditors, and others with interest in the property, and providing such persons with necessary information regarding the subject receivership.

B. Finances and Assets of the Association and Receivership Estate.

The Receiver had all funds of the Association transferred to Lead Counsel’s fiduciary account from the bank at which the Association had an account at the time the Order Appointing Receiver [D.E. 10] was entered. The Receiver has also collected some regular maintenance payments from the Association membership. The Receiver attaches a current financial accounting report as of January 18, 2024 hereto as **Exhibit 1** (Standard Fund Accounting Report).

And, the Court approved the payment of certain creditors of the Association and some fees of professionals on April 24, 2023 [D.E. 24], September 19, 2023 [D.E. 35], and December 7, 2023 [D.E. 42]. The Court also approved two loan certificates in the amount of four-hundred-thousand dollars (\$400,000) for payment to certain creditors and professional on March 28, 2023 [D.E. 21], and in the amount of five-hundred-thousand dollars (\$500,000) for the demolition of

the structurally damaged building on the condominium property on August 17, 2023 [D.E. 31]. Further information regarding the demolition is set forth below.

C. The Association's Business Operations.

Pursuant to the Order Appointing Receiver [D.E. 10], the Receiver investigated the business operations, management duties, and responsibilities of the Association, and began the collection of maintenance fees, the handling of payments to contractors or other creditors, maintenance of the Association, day-to-day functions of the Association (such as security, fencing, debris removal, compliance with governmental orders, and garbage removal), and relations with unit owners and residents, among other things.

The Receiver and his professionals continue to maintain unit owner and resident relations by updating the receivership website (<https://newworldcondoreceivership.com/>), and communicating with unit owners and residents and other interested parties via e-mail (newworldreceivership@gmail.com) and the direct phone line for the receivership (786-854-7523). Since the Receiver filed his Third Report [D.E. 40], the Receiver, through Lead Counsel, notified the unit owners and other interested parties of updates concerning the partition action referenced *infra*, and communicated with unit owners and others interested, along with Special Counsel, regarding several title related matters in preparation of the anticipated sale of the condominium property, among other things. Lead Counsel continues to field calls and emails from residents and unit owners each week, answering questions or providing requested information or both. The Receiver and Lead Counsel have also held twelve Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer questions. The most recent Zoom Meetings were held on October 23, 2023 and January 23, 2024.

D. Retrieval of Belongings.

As set forth in the Receiver's prior reports [D.E. 23, 29, 40], the Building Official for the City of Miami Gardens authorized certain unit owners to retrieve their personal belongings from certain units, and all authorized residents and unit owners who scheduled appointments successfully retrieved their personal belongings from their units and their vehicles from the property.¹ Since the filing of the Receiver's Second Report [D.E. 29], no further appointments were being made absent special circumstances due to the pending demolition discussed *infra*.

E. Written Notice Required for Repairs.

As referenced in the Receiver's prior reports [D.E. 23, 29, 40], the Receiver and Lead Counsel did not receive written notice to repair the condominium property from 70% of unit owners as required by section 12.8(b)(ii) of the Declaration of Condominium (Book 17301, Page 1661), and therefore, the Association is to dissolve pursuant to its Declaration of Condominium. The Receiver, through Lead Counsel, filed claims for declaratory judgment as to the dissolution and for partition of the condominium property as referenced *infra*.

F. Demolition.

As set forth in the Receiver's Third Report [D.E. 40], the Receiver, through Lead Counsel, moved the Court to allow the Receiver to demolish the structurally damaged building on the condominium property and enter into an agreement to borrow the funds needed for such demolition on August 16, 2023 [D.E. 30]. The Court approved the demolition and related loan certificate, and authorized the Receiver to enter into negotiations with the bidders, and a contract, to demolish the buildings based on cost and other variables to obtain the best quality and value for the owners on

¹ All unit owners and residents which were not authorized to retrieve their personal belongings due to life/safety concerns (*i.e.* Unit Nos. 214-236) were notified of non-authorization, and provided background information as to why access was prohibited, as well as photographs of the condition of their units.

August 17, 2023 [D.E. 31]. And, on September 13, 2023, the Receiver, through Lead Counsel, notified the unit owners and others interested in the condominium property of the Court-approved demolition via email and a Notice of Demolition filed in the above-captioned action [D.E. 32]. Such notice also provided that Demolition Gods LLC was contracted to perform the demolition.

In preparation of the permitting process and demolition, Demolition Gods LLC took drone footage and photographs of the condominium property, obtained an asbestos report, and obtained a survey of the property. And, the Receiver, through Lead Counsel, executed a notice of commencement for the demolition and related permit applications.² The related permit applications were submitted to the Building Official for the City of Miami Gardens on or about October 2, 2023. The Building Official for the City of Miami Gardens issued and approved the master demolition permit on or about January 26, 2024, issued and approved the sub-permit for plumbing on or about February 1, 2024, and is currently reviewing the last needed sub-permit for landscaping. The demolition will commence after the sub-permit for landscaping is approved by the Building Official for the City of Miami Gardens. The demolition is expected to be completed within 1-3 months of such approval date.

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

² The first permit application authorizes Demolition Gods LLC to demolish the building, and the second permit application authorizes a sub-contractor of Demolition Gods LLC, PlumDam Amazing, Inc., to cap the sewer and install a hose necessary to demolish the building. Another sub-permit for landscaping was also submitted as necessary for the demolition.

³ These cases were filed against the Association in violation of the stay provision set forth in the Order Appointing Receiver [D.E. 10], which states: “A stay is hereby imposed, prohibiting all persons and entities from commencing [] any litigation against . . .the ASSOCIATION without prior approval of this Court.” [D.E. 10, at ¶ A].

i. Eliteway Class Action (f/k/a Whitfield Class Action).⁴

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40], the Association is no longer a party to the class action lawsuit initially filed by one of the unit owner’s tenants, Shekita Whitfield, against the Association and its former property management company and former board members on March 3, 2023. *See Whitfield, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Whitfield Class Action”).

Since the filing of the Receiver’s Second Report [D.E. 29], the court in the Whitfield Class Action entered an unopposed order granting plaintiff’s motion to amend the case caption to reflect the names of unit owners (instead of the tenant, Ms. Whitfield, who initially filed the lawsuit), and the caption of the Whitfield Class Action was amended to remove Ms. Whitfield and is now styled as *Eliteway Capital Investments, LLC, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Eliteway Class Action”).

Since the filing of the Receiver’s Third Report [D.E. 40], the Receiver, through Lead Counsel, monitor the Eliteway Class Action as needed.

ii. Thomas Class Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40], certain tenants of certain unit owners filed a lawsuit against the Association and its former property management company on July 11, 2023. *See Thomas, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-019490-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Thomas Class Action”). After initially

⁴ As set forth in the Receiver’s Third Report [D.E. 40], the “Eliteway Class Action” was referred to as the “Whitfield Class Action” in the Receiver’s First and Second Reports [D.E. 23, 29], and is now being referred to as the “Eliteway Class Action” pursuant to the Unopposed Order on Motion to Amend Case Caption entered in the same case now styled *Eliteway Capital Investments, LLC, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023).

including the Association as a defendant in that case, the plaintiffs amended their complaint to, *inter alia*, drop the Association as a party, and therefore, the Association is no longer a party to that action.

The plaintiffs in that case served a third-party subpoena duces tecum upon the Association in the Thomas Class Action, which required the Receiver to respond and produce documents. Also, the plaintiffs in that case moved the Court in the above-captioned action to partially lift the stay of litigation [D.E. 36] imposed by the Court in the Order Appointing Receiver [D.E. 10, at § A]. Prior to the February 5, 2024 hearing on the foregoing motion, counsel for the plaintiffs in the Thomas Class Action and the Receiver, through Lead Counsel, agreed to the form of a stipulated order to partially lift stay. Following the foregoing hearing, the Court entered the Stipulated Order to Partially Lift Stay [D.E. 47] on February 5, 2024. Pursuant to such order, the above-referenced stay is lifted under the following conditions: (i) the third-party plaintiffs are “permitted to bring an action naming the Association as a [d]efendant,” (ii) any requested “relief against the Association will be limited to the maximum amount they can recover from the Association’s insurance policy, to the extent there is coverage,” and (iii) such plaintiffs “(and, in the event of class certification, their represented class) are barred from seeking recovery from the assets of the Association.” [D.E. 47, at ¶¶ 2-4].

iii. The Valtom Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40], one of the unit owners, Valtom, LLC, filed a lawsuit against the Association and its former property management company and former board members on April 11, 2023. *See Valtom, LLC v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012984-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Valtom Action”). Valtom, LLC voluntarily dismissed its action without prejudice.

iv. The Forty Year Investment Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40], one of the unit owners, Forty Year Investment, LLC, filed a lawsuit against the Association, and its former property management company and former board members on March 31, 2023. *See Forty Year Investment, LLC, v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012973-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Forty Year Investment Action”). Forty Year Investment, LLC voluntarily dismissed its action without prejudice.

v. The Deutsche Bank Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40], Deutsche Bank National Trust Company filed a complaint for foreclosure against, *inter alia*, a unit owner, his wife, and the Association on July 27, 2023. *See Deutsche Bank National Trust Co. v. King, et al.*, Case No. 2023-020443-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Deutsche Bank Action”). Service of process had not been properly effectuated upon the Association (*i.e.* it appears that the plaintiff in that case defectively served the Florida Secretary of State). The Receiver and Lead Counsel appeared in the Deutsche Bank Action on November 14, 2023. Thereafter, the Receiver moved to transfer that case from Division CA-07 to the above-captioned Division CA-11, and moved to dismiss or stay the Deutsche Bank Action. Prior to the January 31, 2024 hearing on the motion to transfer, counsel for Deutsche Bank agreed to the requested transfer, and therefore, the transfer was granted on January 31, 2024. And, the same day, counsel for Deutsche Bank agreed to a stay of litigation pending the resolution of the partition action referenced *infra*. A hearing on the matter is scheduled to take place on February 22, 2024.

vi. Mechanic’s Lien.

As referenced in the Receiver's Second and Third Reports [D.E. 29, 40], the Receiver, through Lead Counsel, demanded the roofing companies which were working on the Association's roof at the time of the January 28, 2023 fire remove the mechanic's lien which they filed against the Association on July 7, 2023 (Book 33784, Pages 1200-1201) because such lien was untimely and otherwise deficient. The roofing companies failed to respond to the foregoing demand. As such, the Receiver, through Lead Counsel, served subpoenas duces tecum upon the corporate representatives of the roofing companies, as well as the owners of the roofing companies. The corporate representative of one of the roofing companies, Elite Innovation Construction, Inc., and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), did not appear for their scheduled depositions on November 7, 2023. The corporate representative of the other roofing company, D.J.T.H., LLC, and its owner, Herby Myrtil (a/k/a Herby Myrtil) appeared for their scheduled depositions on November 22, 2023. Following the foregoing events, the Receiver, on behalf of the Association, commenced a separate action against Elite Innovation Construction, Inc. and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), to quiet title and discharge the above-referenced mechanic's lien. Further information concerning that action is set forth *infra*.

H. Legal Proceedings Brought by the Receiver.

i. The Partition Action.

As referenced in the Receiver's prior reports [D.E. 23, 29, 40], the Receiver, through Lead Counsel, filed a complaint for partition and declaratory judgment against the unit owners and other interested parties with the intent of having the condominium property converted into a fee simple estate to be sold and that the sales proceeds will be distributed in accordance with the Order

Appointing Receiver [D.E. 10] and further orders of the Court. *See Gersten v. Higgs, et al.*, Case No. 2023-015785-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Partition Action”).⁵

Since the filing of the Receiver’s Third Report [D.E. 40], the Court extended the time for the Receiver to effectuate service of process upon the more than 100 respondents in that case (most of which have already been served or signed a waiver of service) up to and including February 29, 2024.⁶ The Receiver, through Lead Counsel, has continued his efforts to serve the remaining four (4) respondents which have not yet been served either because such respondents are avoiding service or are believed to be deceased.⁷ As such, the Receiver moved the Court for a six-month extension of time to effectuate service upon the foregoing respondents via publication or otherwise.

And, after the Receiver obtained an updated title search of the real property which revealed that additional persons/entities may have an interest in the subject property, the Receiver moved the Court for leave to amend its complaint to name such additional persons/entities as respondents in the Partition Action. The Court granted the Receiver’s motion for leave to amend on January 23, 2024, and the amended complaint was deemed filed as of that date. The Receiver, through Lead Counsel, is working on effectuating service upon the more than 75 newly added respondents.

⁵ The Receiver seeks a partition of the condominium property, as well as a judicial determination that the Association is terminated pursuant to section 12.8 of the Declaration of Condominium because 70% or more of the unit owners did not agree in writing to repair the condominium property within 60 days of the January 28, 2023 fire, *i.e.* by March 29, 2023.

⁶ As referenced in the Receiver’s Second and Third Reports [D.E. 29, 40], the Court had previously extended the time for the Receiver to effectuate service of process upon the more than 100 respondents in that case (most of which have already been served or signed a waiver of service) up to and including October 31, 2023. While the Receiver, through Lead Counsel, worked diligently to serve the remaining respondents prior to such date, he was unable to do so, and thus, moved for another extension of time to effectuate service up to and including February 29, 2024.

⁷ Upon information and belief, no estates have been opened as to the two respondents which are believed to be deceased.

The Receiver remains hopeful that the Partition Action will result in the condominium property being converted into a fee simple estate, and then sold, and that the funds from the sale will be distributed in accordance with the Order Appointing Receiver [D.E. 10] and further orders of the Court.

ii. The Prestige Action.

As referenced in the Receiver's Second and/or Third Report [D.E. 29, 40], the Receiver, through Lead Counsel, sued the Association's former property management company, Prestige Management Solutions, Inc. ("Prestige"), for gross negligence, common law breach of fiduciary duty, and statutory breach of fiduciary duty in the case styled *Gersten v. Prestige Management Solutions, Inc.*, Case No. 2023-019453-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Prestige Action"). In response to the complaint, Prestige moved for a more definite statement.

Since the filing of the Receiver's Third Report [D.E. 40], the Receiver moved the Court to stay the Prestige Action, or, in the alternative, to extend its case management deadlines. Thereafter, counsel for Prestige agreed to the requested stay, and the Court entered its Agreed Order Placing Case on Inactive Status on January 8, 2024.

iii. The Mechanic's Lien Action.

On December 15, 2023, the Receiver, through Lead Counsel, sued, *inter alia*, the roofing company which was working on the Association's roof at the time of the January 28, 2023 fire, Elite Innovation Construction, Inc. ("Elite Innovation"), and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), to discharge the untimely and otherwise deficient mechanic's lien which they filed against the Association on July 7, 2023 (Book 33784, Pages 1200-1201) in the case styled *Gersten v. Elite Innovation Construction, Inc., et al.*, Case No. 2023-028334-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Mechanic's Lien Action"). Because facial defects in the mechanic's lien referenced

condominium Unit Nos. 101 and 214, the Receiver named the owners of such units as defendants in that action. Both unit owners waived service of process. Elite Innovation and Mr. Phillips were served the complaint and summons on January 5, 2024. As such, their response to the complaint was due by January 25, 2024. Neither Elite Innovation nor Mr. Phillips responded to the complaint or appeared in the case through counsel or otherwise. Due to their failure to plead or otherwise defend themselves in that action, the Receiver has obtained, or will seek to obtain, clerk's defaults and proceed to seek final judgment.

II. Plan for Moving Forward.

The Receiver and Lead Counsel will continue to take appropriate measures pursuant to the Declaration of Condominium and under Florida law to convert the condominium property into a fee simple estate, and then sell the land pursuant to a process approved by this Court. The Receiver will also continue to pursue claims and investigate other claims which the Association may pursue, as well as defend the Association as set forth in the Order Appointing Receiver [D.E. 10]. The Receiver and his team will continue to communicate with the unit owners, residents, creditors, and other interested parties to inform them of any updates to their units and the status of this receivership, as well as answer any general or specific questions they may have.

III. Conclusion.

The Receiver appreciates the opportunity to assist the Court in this matter. While significant efforts have already yielded progress, the Receiver will continue his efforts as discussed herein to fulfill his duties under the Court's Order Appointing Receiver [D.E. 10], with the focus on affording the most beneficial and cost-effective solution as to the above-referenced matters.

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

As detailed in the Receiver’s prior reports [D.E. 23, 29, 40] and/or his foregoing Fourth Report, to assist in carrying out his duties, and as authorized by the Order Appointing Receiver [D.E. 10], the Receiver retained (i) his law firm, Gordon Rees Scully Mansukhani LLP (“GRSM”), (ii) Damian | Valori | Culmo as lead counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association (“Lead Counsel”), (iii) an experienced real estate lawyer, Richard (“Rick”) Zelman, Esq., through his law firm, Sacher Zelman Hartman, P.A., to assist in title related matters concerning the Partition Action (“Special Counsel”), and (iv) an experienced insurance coverage law firm, Cimo Mazer Mark PLLC, to assist with matters concerning insurance of the Association and whether coverage is available to same and/or the unit owners and/or third-parties seeking damages against the Association (“Insurance Counsel”).⁸

The fees and costs incurred by GRSM and Lead Counsel are reflected on the invoices attached hereto as **Composite Exhibit 2**, which reflect the time entries and work performed by the Receiver and Lead Counsel for the benefit of the Association from November 1, 2023 through January 31, 2024,⁹ as well as the Receiver’s reductions thereto. The fees and costs incurred by Special Counsel are reflected on the invoices attached hereto as **Composite Exhibit 3** and reflect the time entries and work performed by Special Counsel for the benefit of the Association from November 1, 2023 through January 31, 2023, as well as the Receiver’s reductions thereto. The fees and costs incurred by Insurance Counsel are reflected on the invoices attached hereto as

⁸ The foregoing professionals have reduced their regular rates for this matter along with additional reductions and discounts, and the Receiver has utilized lower rate professionals whenever possible.

⁹ February 2024 invoices from GRSM, Lead Counsel, and Special Counsel will be submitted with the Receiver’s fifth report.

Composite Exhibit 4 and reflect the time entries and work performed by Insurance Counsel for the benefit of the Association from November 1, 2023 through January 31, 2023, as well as the Receiver's reductions thereto.

As reflected in **Composite Exhibit 2**, from November 1, 2023 to January 31, 2024, GRSM incurred fees in the total amount of \$9,695.00, and Lead Counsel incurred fees in the amount of \$67,621.00 and costs in the amount of \$4,471.91. As reflected in **Composite Exhibit 3**, from November 1, 2023 to January 31, 2024, Special Counsel incurred fees in the amount of \$19,473.00, and costs in the amount of \$209.82. As reflected in **Composite Exhibit 4**, from December 21, 2023 to January 31, 2024, Insurance Counsel incurred fees in the amount of \$4,102.50.

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees and costs of Special Counsel from November 1, 2023 to January 31, 2024 in the total amount of \$19,682.82, and of Insurance Counsel from December 21, 2023 to January 31, 2024 in the total amount of \$4,102.50. GRSM and Lead Counsel seek approval of their fees and costs from November 1, 2023 through January 31, 2024, but agree to defer payment of such fees until a later time when the Association is better able to pay such fees and costs, or will seek payment from the sale of the property. A proposed order is attached hereto as **Exhibit 5**.

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, Special Counsel, and Insurance 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, Special Counsel, and Insurance Counsel as applicable, by the third-party vendor and paid by GRSM, Lead Counsel, Special Counsel, and Insurance Counsel as applicable, to such vendor. To the extent that such services were performed by me as Receiver, GRSM, Lead Counsel, Special Counsel, and/or Insurance Counsel I certify that I, GRSM, Lead Counsel, Special Counsel, and/or Insurance Counsel as applicable, am/is not making a profit on such reimbursable service.

s/ David M. Gersten _____
THE HON. DAVID M. GERSTEN (RET.)
COURT-APPOINTED RECEIVER

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

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI LLP

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

By: s/ Eric R. Thompson

Eric R. Thompson
Florida Bar No. 888931

DAMIAN | VALORI | CULMO

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

By: s/ Melanie E. Damian

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Florida Court's e-Filing Portal upon all counsel of record on this 14th day of February, 2024.

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

Exhibit 1

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

STANDARDIZED FUND ACCOUNTING REPORT

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

Reporting Period 2/7/2022 to 1/18/2024

		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (As of 2/7/2023):	\$ -	\$ -	
	Increases in Fund Balance:			
Line 2	Business Income	\$ -	\$ -	\$ -
Line 3	Cash and Deposits [1]	\$ 1,003,207.03	\$ 1,003,207.03	\$ 1,003,207.03
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 297.08	\$ 297.08	\$ 297.08
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available			\$ 1,003,504.11
	(Lines 1-8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 704,408.68	\$ 704,408.68	\$ 704,408.68
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 704,408.68
Line 11	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Expenses:	\$ -	\$ -	\$ -
Line 12	Disbursements to Court/Other	\$ -	\$ -	\$ -
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -	\$ -	\$ -
Line 12b	Federal Tax Payments	\$ -	\$ -	\$ -
	Total Disbursements to Court/Other			
	Total Funds Disbursed (Lines 9-11)			\$ 704,408.68
Line 13	Ending Balance (As of January 18, 2024)			\$ 299,095.43
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 299,095.43

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

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

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

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

Date of Check	From	Amount
8/15/2023	Maintenance Fee Deposit	\$ 269.13
8/16/2023	Maintenance Fee Deposit	\$ 895.81
8/22/2023	Maintenance Fee Deposit	\$ 397.77
8/28/2023	Maintenance Fee Deposit	\$ 626.48
9/1/2023	Maintenance Fee Deposit	\$ 843.60
9/5/2023	Maintenance Fee Deposit	\$ 2,417.11
9/12/2023	Maintenance Fee Deposit	\$ 1,700.79
9/18/2023	Maintenance Fee Deposit	\$ 574.47
9/18/2023	New Wave Loan	\$ 500,000.00
9/29/2023	Maintenance Fee Deposit	\$ 1,747.41
10/2/2023	Maintenance Fee Deposit	\$ 852.74
10/6/2023	Maintenance Fee Deposit	\$ 1,166.14
10/12/2023	Maintenance Fee Deposit	\$ 1,735.56
10/18/2023	Maintenance Fee Deposit	\$ 895.81
10/23/2023	Maintenance Fee Deposit	\$ 851.47
10/31/2023	Maintenance Fee Deposit	\$ 1,435.01
11/6/2023	Maintenance Fee Deposit	\$ 1,024.45
11/14/2023	Maintenance Fee Deposit	\$ 1,293.58
11/17/2023	Maintenance Fee Deposit	\$ 901.13
12/5/2023	Maintenance Fee Deposit	\$ 2,288.01
12/7/2023	Maintenance Fee Deposit	\$ 711.11
12/8/2023	Maintenance Fee Deposit	\$ 313.34
12/14/2023	Maintenance Fee Deposit	\$ 1,293.24
12/19/2023	Maintenance Fee Deposit	\$ 313.34
12/26/2023	Maintenance Fee Deposit	\$ 895.81
1/4/2024	Maintenance Fee Deposit	\$ 1,832.85
1/8/2024	Maintenance Fee Deposit	\$ 1,606.58
1/18/2024	Maintenance Fee Deposit	\$ 851.47
Total		\$ 1,003,207.03

City National Bank Interest

Date	Explanation	Amount
2/28/2023	interest	\$ 0.01
3/31/2023	interest	\$ 0.42
4/30/2023	interest	\$ 45.62
5/31/2023	interest	\$ 25.13
6/30/2023	interest	\$ 8.03
7/31/2023	interest	\$ 2.77
8/31/2023	interest	\$ 1.70
9/30/2023	interest	\$ 28.43
10/31/2023	interest	\$ 69.03
11/30/2023	interest	\$ 60.76
12/31/2023	interest	\$ 55.18
Total		\$ 297.08
GRAND TOTAL OF RECEIPTS		\$ 1,003,504.11

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

Date	From	Amount
2/27/2023	Returned check	\$ 313.34
2/27/2023	Returned check bank fee	\$ 12.00
3/6/2023	Panissa Security	\$ 5,000.00
3/6/2023	John's Garage Door	\$ 299.60
3/6/2023	Waste Connection	\$ 2,422.24
3/7/2023	HSM Consulting, Inc.	\$ 1,800.00
3/14/2023	Panissa Security	\$ 2,909.94
3/14/2023	Appraisal First Real Estate Appraisers	\$ 3,000.00
3/27/2023	Panissa Security	\$ 3,000.00
3/31/2023	Telephone Service	\$ 20.00
4/5/2023	Legal Fees for closing	\$ 3,500.00
4/5/2023	Closing Costs	\$ 8,000.00
4/6/2023	Panissa Security	\$ 2,000.00
4/6/2023	Demolition Gods	\$ 6,500.00
4/6/2023	wire fee	\$ 15.00
4/6/2023	wire fee	\$ 15.00
4/7/2023	Stonemark Inc.	\$ 12,598.42
4/7/2023	Stonemark Inc.	\$ 10.00
4/7/2023	HSM Consulting	\$ 6,558.82
4/7/2023	Morandi Engineering and Construction	\$ 2,995.00
4/7/2023	Waste Connection	\$ 209.68
4/7/2023	Waste Connection	\$ 576.77
4/7/2023	Panissa Security	\$ 2,909.94
4/7/2023	Panissa Security	\$ 7,909.94
4/7/2023	Fence	\$ 4,800.00
4/7/2023	Insurance	\$ 12,009.21
4/11/2023	Demolition Gods	\$ 6,500.00
4/11/2023	wire fee	\$ 15.00
4/11/2023	Avante-Nea Insurance	\$ 4,756.26
4/17/2023	Stonemark Inc.	\$ 1,428.57
4/17/2023	Stonemark Inc.	\$ 10.00
4/18/2023	Panissa Security	\$ 3,954.72
4/18/2023	Panissa Security	\$ 3,954.72
4/19/2023	Demolition Gods	\$ 13,000.00
4/19/2023	wire fee	\$ 15.00
4/21/2023	Stonemark Inc.	\$ 11,984.21
4/21/2023	Stonemark Inc.	\$ 10.00
5/1/2023	Damian & Valori	\$ 137,794.21
5/1/2023	Gordon Rees Scully Mansukhabi LLP	\$ 32,860.00
5/1/2023	wire fee	\$ 15.00
5/1/2023	The Morgan Law Group	\$ 9,020.00

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

Date	From	Amount
5/1/2023	Stonemark Inc.	\$ 1,346.26
5/1/2023	Stonemark Inc.	\$ 10.00
5/1/2023	Telephone Service	\$ 20.00
5/3/2023	Maverick Security Services LLC	\$ 1,810.44
5/18/2023	New Wave Loan	\$ 3,300.00
5/18/2023	New Wave Loan	\$ 15.00
5/18/2023	Stonemark Inc.	\$ 11,984.21
5/18/2023	Stonemark Inc.	\$ 10.00
5/19/2023	Panissa Security	\$ 3,954.72
5/19/2023	Maverick Security Services LLC	\$ 8,448.72
5/24/2023	DVS Technologies	\$ 433.35
5/24/2023	DVS Technologies	\$ 379.85
5/24/2023	The Madison Insurance Group	\$ 716.00
5/2/2023	The Madison Insurance Group	\$ 2.95
5/31/2023	Telephone Service	\$ 20.00
6/1/2023	New Wave Loan	\$ 3,300.00
6/1/2023	Maverick Security Services LLC	\$ 8,448.72
6/13/2023	Maverick Security Services LLC	\$ 8,448.72
6/13/2023	Stonemark Inc.	\$ 11,984.21
6/13/2023	Stonemark Inc.	\$ 10.00
6/2/2023	The Madison Group	\$ 4,180.05
6/21/2023	The Madison Group	\$ 2.95
6/27/2023	Waste Connection	\$ 1,013.33
6/27/2023	The Madison Group	\$ 1,995.00
6/27/2023	The Madison Group	\$ 2.95
6/27/2023	Maverick Security Services LLC	\$ 8,448.72
6/30/2023	Telephone Service	\$ 20.00
7/1/2023	New Wave Loan	\$ 3,300.00
7/11/2023	Maverick Security Services LLC	\$ 8,649.88
7/14/2023	Action Junk Removal Services	\$ 450.00
7/24/2023	Waste Connection	\$ 77.65
7/25/2023	Vanguard Construction	\$ 10,000.00
7/25/2023	Maverick Security Services LLC	\$ 8,448.72
7/31/2023	Telephone Service	\$ 20.00
8/1/2023	New Wave Loan	\$ 3,300.00
8/8/2023	Maverick Security Services LLC	\$ 8,448.72
8/22/2023	Maverick Security Services LLC	\$ 8,448.72
8/31/2023	Telephone Service	\$ 20.00
9/1/2023	New Wave Loan	\$ 3,300.00
9/7/2023	Maverick Security Services LLC	\$ 8,448.72
9/18/2023	New Wave Loan	\$ 10,000.00

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

Date	From	Amount
9/18/2023	wire fee	\$ 15.00
9/19/2023	Demolition Gods	\$ 93,750.00
9/19/2023	wire fee	\$ 15.00
9/19/2023	Sacher Zelman Harman PA	\$ 14,407.00
9/19/2023	Maverick Security Services	\$ 8,448.72
9/29/2023	Telephone Service	\$ 20.00
10/1/2023	New Wave Loan	\$ 3,300.00
10/6/2023	Maverick Security Sevices	\$ 8,448.72
10/16/2023	Maverick Security Services	\$ 8,448.72
10/18/2023	New Wave Loan	\$ 4,125.00
10/30/2023	Maverick Security Services	\$ 8,448.72
10/31/2023	Telephone Service	\$ 20.00
11/1/2023	New Wave Loan	\$ 3,300.00
11/14/2023	Maverick Security Services	\$ 8,448.72
11/18/2023	New Wave Loan	\$ 4,125.00
11/28/2023	Maverick Security Services	\$ 8,750.46
11/30/2023	Telephone Service	\$ 20.00
12/1/2023	New Wave Loan	\$ 3,300.00
12/7/2023	Sacher Zelman Harman PA	\$ 7,198.35
12/13/2023	Maverick Secuity Services	\$ 8,488.72
12/18/2023	New Wave Loan	\$ 4,125.00
12/27/2023	Maverick Security Services	\$ 8,750.46
12/29/2023	HSM Consulting	\$ 825.00
12/30/2023	Telephone Service	\$ 20.00
1/1/2024	New Wave Loan	\$ 3,300.00
1/2/2024	City of Miami Gardens	\$ 2,817.50
1/10/2024	Maverick Security Services	\$ 9,353.94
1/18/2024	New Wave Loan	\$ 4,125.00
1/18/2024	City of Miami Gardens	\$ 10,092.50
GRAND TOTAL OF EXPENSES		\$ 704,408.68

Composite Exhibit 2

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

Invoice

Invoice Date: 12/31/2023
 Invoice No: 23988
 Due Date: Due Upon Receipt

Matter: MME1676 Memo: MME1676 Louis Jean Baptiste et al. v. New Wor... Louis Jean Baptiste et al.
 v. New Wor...

Professional Fees

Date	Description	Staff	Rate	Hours	Amount
11/01/2023	Analyze judgments referenced in title search in preparation of working on amended complaint for partition with focus on adding judgment debtors as respondents to partition action (1.2); work on amended complaint with focus on adding above-referenced judgment debtors to style of the case (0.6); same with focus on adding same to list of lienholders (0.8).	MJL	\$350.00	2.60	\$910.00
11/02/2023	Review email regarding Unit 114 retrieval of possessions.	PFV	\$550.00	0.10	\$55.00
11/02/2023	Email with counsel for former lender as to unit 245.	PFV	\$550.00	0.10	\$55.00
11/02/2023	Analyze Deutsche bank foreclosure claim and equitable lien related issues.	PFV	\$550.00	0.60	\$330.00
11/02/2023	Conference regarding judgments held by association and other claims and issues relating to title matters.	PFV	\$550.00	0.50	\$275.00
11/02/2023	Prepare email to receiver regarding motion to amend complaint.	PFV	\$550.00	0.20	\$110.00
11/02/2023	Analyze public records and/or Lexis Accurint reports to determine last known addresses of mortgagees and judgment debtors referenced in title search in preparation of working on amended complaint for partition (1.2); work on amended complaint for partition with focus on adding last known addresses of above-referenced mortgagees and judgment debtors into list of lienholders to be attached as exhibit to the amended complaint (0.9); analyze Deutsche Bank's claims and related issues to determine litigation plan (0.6); email communications with Receiver regarding same (0.1); work on notice of appearance to be filed in foregoing case (0.2); conference regarding final judgments in favor of association and other title related matters (0.6).	MJL	\$350.00	3.60	\$1,260.00

11/04/2023	Analyze documents produced by Prestige Property Management in preparation to determine which documents concern the roof repairs and roofers in preparation of working on outlines for the depositions of the corporate representative of Elite Innovation Construction Inc., and its owner, E. Phillips, Jr. (1.1); analyze bank statements provided by Truist in preparation of same (0.8); analyze mechanic's lien filed by deponents in preparation of same (0.3); compare same with roofing contract in preparation of same (0.3); analyze updated statutes regarding mechanic's lien in preparation of same (0.2); analyze fire investigation report in preparation of same (0.2); work on outline of questions to be asked during the deposition of the corporate representative of Elite Innovation Construction Inc. with focus on questions regarding background information (0.9); same with focus on questions regarding the mechanic's lien (0.3); same with focus on questions regarding the subject roofing contract (0.6).	MJL	\$350.00	4.70	\$1,645.00
11/05/2023	Work on outline of questions to be asked during the deposition of the corporate representative of Elite Innovation Construction Inc. with focus on questions regarding checks payable to D.J.T.H, LLC for subject roof repairs (0.4); same with focus on questions regarding the notice of commencement (0.3); same with focus on questions regarding the permit application (0.2); same with focus on questions regarding contractor licenses which have been put on probation (0.3); same with focus on questions regarding inspections of subject roof repairs (0.4); same with focus on questions regarding facially deficient mechanic's lien (0.7); same with focus on questions regarding demand to release or discharge foregoing mechanic's lien (0.4).	MJL	\$350.00	2.70	\$945.00
11/06/2023	Reviewing insurance issues and potential claims and class counsel.	MME	\$550.00	0.80	\$440.00
11/06/2023	Review notice from CGL policy and attachments.	PFV	\$550.00	0.30	\$165.00
11/06/2023	Draft email regarding background information in response to stay motion addressing insurance matters, related litigation, and possible arguments as to lack of irreparable harm.	PFV	\$550.00	0.90	\$495.00
11/06/2023	Email counsel for Thomas Plaintiff regarding roofer depositions.	PFV	\$550.00	0.20	\$110.00
11/06/2023	Email Receiver regarding status and planning as to Prestige cases.	PFV	\$550.00	0.20	\$110.00
11/06/2023	Review email to Simpson unit owners regarding outstanding judgments.	PFV	\$550.00	0.20	\$110.00
11/06/2023	Email regarding property access request by Ms. Henderson.	PFV	\$550.00	0.10	\$55.00

11/06/2023	Work on outline of questions to be asked during the deposition of E. Phillips, Jr. with focus on background questions (0.2); same with focus on subject roof repairs (0.3); same with focus on relationship to H. Mythril (0.4); same with focus on relationship with D.J.T.H, LLC (0.3); same with focus on payments to D.J.T.H, LLC for subject roof repairs (0.2); same with focus on mechanic's lien (0.2); same with focus on notice of commencement (0.1); same with focus on roofing contract (0.3); same with focus on demand to release foregoing mechanic's lien (0.2); work on list of exhibits to be used during depositions of the corporate representative of Elite Innovation Construction Inc., and its owner, E. Phillips, Jr. (0.4).	MJL	\$350.00	2.60	\$910.00
11/07/2023	Analyze outline for Elite Innovation Construction Inc.'s deposition and documents to be used as exhibits during same in preparation of same (0.7); analyze outline for E. Phillips, Jr.'s deposition and documents to be used as exhibits during same in preparation of same (0.6); communications with D. Marin regarding service of partition complaint upon registered agent of Beneficial Florida Inc. (0.1).	MJL	\$350.00	1.40	\$490.00
11/07/2023	Prepare for deposition of corporate representative of Elite Innovation.	PFV	\$550.00	0.50	\$275.00
11/07/2023	Appear at deposition and instruct court reporter as to certificate of non-appearance.	PFV	\$550.00	0.20	\$110.00
11/07/2023	Review email regarding clearing title as to demolition notice of commencement.	PFV	\$550.00	0.10	\$55.00
11/07/2023	Review email from title counsel regarding Elite Innovation lien.	PFV	\$550.00	0.10	\$55.00
11/07/2023	Prepare analytical strategy email to title counsel in response to proposed course of action regarding Elite Innovation lien.	PFV	\$550.00	0.60	\$330.00
11/07/2023	Review and analyze email from process server regarding lien holder, Beneficial Florida Inc.	rs	\$100.00	0.30	\$30.00
11/08/2023	Email with Higgs lender regarding response to the summons and complaint in partition action.	PFV	\$550.00	0.10	\$55.00
11/08/2023	Review notice of hearing regarding motion to lift stay.	PFV	\$550.00	0.10	\$55.00
11/08/2023	Analyze correspondence from J. Downs regarding former property management company's insurance policy and attachments to same in preparation of working on litigation plan regarding same.	MJL	\$350.00	0.20	\$70.00
11/09/2023	Telephone call with R. Zelman regarding amendments to partition complaint and updates from title insurance underwriter (0.7); email communications with Receiver regarding bills from July to October 2023 in preparation of attaching same to Receiver's third report and fee app (0.1); email communications with R. Zelman regarding same in preparation of same (0.1); email communications with R. Zelman regarding termination of notice of commencement to be signed by Receiver upon completion of demolition (0.1); work on notice of appearance in Deutsche Bank case with focus on including the Receiver's law firm to service list (0.2).	MJL	\$350.00	1.20	\$420.00

11/09/2023	Review notice of appearance in unit owner foreclosure case.	PFV	\$550.00	0.10	\$55.00
11/10/2023	Telephone call with D. Marin regarding service of process to be effectuated upon A. Henderson (0.2); analyze documents provided by Prestige to determine whether any pending contracts exist for the sale of any condominium unit in preparation of working on affidavit of Receiver regarding same (1.1); work on foregoing affidavit of Receiver (0.4).	MJL	\$350.00	1.70	\$595.00
11/13/2023	Review report regarding Ms. Scott and Ms. Henderson visit to property.	PFV	\$550.00	0.20	\$110.00
11/13/2023	Email communications with the Receiver regarding October invoice in preparation of filing fee application (0.1); email communications with R. Zelman regarding same in preparation of same (0.1); work on fee application with focus on calculating total amount of attorneys' fees and costs for Receiver's law firm (0.2); same with focus on same for lead counsel (0.2); same with focus on same for special counsel (0.2); same with focus on approval of loan certificates (0.3); email communications with Receiver regarding approval of invoices and discounted legal rates (0.2).	MJL	\$350.00	1.30	\$455.00
11/14/2023	Meet with team regarding partition status and strategy.	MME	\$550.00	0.30	\$165.00
11/14/2023	Conference with M. Levine regarding amended complaint in partition action with focus on claim as to roofing company and Miami Dade County.	PFV	\$550.00	0.20	\$110.00
11/14/2023	Review case management order in Elite v. Prestige case.	PFV	\$550.00	0.10	\$55.00
11/14/2023	Work on status report to the Court.	PFV	\$550.00	1.40	\$770.00
11/14/2023	Review email regarding Dade County lien incorrectly filed against New World.	PFV	\$550.00	0.20	\$110.00

11/14/2023	Analyze standardized fund accounting report in preparation of working on Receiver's third report (0.1); work on Receiver's third report with focus on adding descriptions of items to standardized fund accounting report (0.5); same with focus on revisions to actions brought against the Association (0.6); work on amended complaint in partition action in preparation of filing same (0.2); work on notice of appearance to be filed in the Deutsche Bank case (0.1); email communications with the Receiver regarding same (0.1); work on Receiver's fee application with focus on proposed order to be attached thereto (0.4); same with focus on invoices to be attached thereto (0.4); email communications with Receiver regarding approval of invoices to be attached to fee application (0.2); email communications with same regarding revisions to third report and fee application (0.2); analyze R. Zelman's letter to D. Jefferies regarding notices of lien filed by Miami-Dade County in preparation of communications with receiver regarding same (0.2); email communications with Receiver regarding same (0.2); email communications with R. Zelman regarding same (0.1); work on complaint against roofers with focus on section regarding parties and venue (0.4); same with focus on allegations regarding untimeliness of mechanic's lien (0.5); same with focus on allegations regarding other facial deficiencies of mechanic's lien (1.1).	MJL	\$350.00	5.30	\$1,855.00
11/15/2023	Telephone call with R. Zelman regarding affidavits signed by unit owners and interested parties and separate action against roofers (0.3); analyze non-identity affidavit of J. Simpson in preparation of working on revisions to amended complaint regarding same (0.1); email communications with L. Fitzpatrick regarding update on permit applications (0.1).	MJL	\$350.00	0.50	\$175.00
11/16/2023	Analyze updated case law regarding leave to amend complaint in preparation of working on motion for leave to amend complaint for partition and declaratory judgment (0.6); work on foregoing motion with focus on factual background (0.4); same with focus on legal arguments (0.8); same with focus on revisions to amended pleading to be attached thereto (0.4); analyze updated case law regarding causes of action to quiet title in preparation of working on complaint against roofing companies (0.9).	MJL	\$350.00	3.10	\$1,085.00
11/16/2023	Email regarding post storm inspection and partial clean up to allow remaining tenant access.	PFV	\$550.00	0.20	\$110.00
11/17/2023	Email communications with the Receiver regarding approval to file motion for leave to amend complaint (0.1); analyze updated case law regarding claim concerning defective mechanic's lien in preparation of working on complaint against roofing companies (0.9); analyze roofing contract, permit application, and other documents concerning subject roof repairs in preparation of same (1.1); work on complaint against roofing companies with focus on background concerning receivership (0.3); same with focus on parties and venue (0.7); same with focus on general allegations regarding roofing contract and payments made pursuant to same (0.8).	MJL	\$350.00	3.90	\$1,365.00

11/18/2023	Email communications with the Receiver regarding filing of motion for leave to amend complaint.	MJL	\$350.00	0.10	\$35.00
11/19/2023	Email regarding owner (Ms. Anderson) request for zoom information regarding hearing on motion to extend time to serve process.	PFV	\$550.00	0.10	\$55.00
11/20/2023	Analyze Receiver's second motion for extension of time to complete service of process upon respondents in partition action in preparation of today's hearing on same (0.1); appear at foregoing hearing on behalf of Receiver (0.2); work on proposed order granting foregoing motion (0.2); email communications with Receiver regarding same (0.1).	MJL	\$350.00	0.60	\$210.00
11/21/2023	Email communications with Receiver regarding proposed order granting Receiver's motion for extension of time to serve process upon respondents in the partition action (0.1); analyze updated case law regarding fraudulent liens in preparation of working on outlines for depositions of H. Myrthil and the corporate representative of D.J.T.H., LLC (0.7); work on outline for deposition of H. Myrthil (0.3); work on outline for deposition of corporate representative of D.J.T.H, LLC (0.2).	MJL	\$350.00	1.30	\$455.00
11/22/2023	Analyze documents to be used during depositions of H. Myrthil and the corporate representative of D.J.T.H, LLC in preparation of depositions of same (0.2); analyze demand to roofers in preparation of working on complaint against same (0.1); analyze mechanic's lien in preparation of same (0.2); analyze roofing contract in preparation of same (0.1); analyze outlines of depositions of roofers in preparation of same (0.4); analyze payments to roofers in preparation of same (0.3); analyze updated case law regarding untimely filing of mechanic's lien in preparation of same (0.6); analyze updated case law regarding claim to remove cloud from title in preparation of same (0.7); analyze updated case law regarding claim to quiet title in preparation of same (0.6); analyze updated case law regarding claim to discharge or release mechanic's lien in preparation of same (0.8); work on complaint against roofers with focus on claim to quiet title (0.4); same with focus on claim to remove clouds from title (0.6); same with focus on claim to discharge or release mechanic's lien (0.4).	MJL	\$350.00	5.40	\$1,890.00
11/22/2023	Prepare for (.5); and take (2.5); deposition of H. Myrthil and draft status report to the Receiver (0.4).	PFV	\$550.00	3.40	\$1,870.00
11/22/2023	Review complaint against Elite Innovation.	PFV	\$550.00	0.40	\$220.00
11/26/2023	Review Simpson non-identity affidavit.	PFV	\$550.00	0.10	\$55.00
11/27/2023	Work on complaint against roofers with focus on revisions to allegations concerning roofing contract and payments made pursuant to same (0.6); conference with P. Valori regarding strategy to quiet title as to untimely mechanic's lien (1.0); work on complaint against roofers with focus on including V. Higgs as a named defendant in the case (0.2); same with focus on including Y. Barnes as a named defendant in the case (0.1); same with focus on including E. Phillips, Jr. as a named defendant in the case (0.1); same with focus on citations to statutes (0.1); email communications with D. Robinson regarding hearing on motion to partially lift stay of litigation (0.1).	MJL	\$350.00	2.20	\$770.00

11/27/2023	Review notice of hearing regarding motion to amend partition action.	PFV	\$550.00	0.10	\$55.00
11/27/2023	Prepare for conference with J. Gersten regarding status and planning.	PFV	\$550.00	0.20	\$110.00
11/27/2023	Attend update call regarding status of demolition, Prestige litigation, Thomas litigation, roofer lien and foreclosure case.	PFV	\$550.00	0.50	\$275.00
11/27/2023	Conference with M. Levine regarding litigation planning as to quiet title action against Elite et al. and work on complaint regarding same.	PFV	\$550.00	1.00	\$550.00
11/27/2023	(No charge) Review Judge's site regarding motion for leave to amend complaint (.2); draft notice of hearing on same (.1); prepare notice and motion for mailing to defendants not included on e-service (.2).	rs		0.50	\$0.00
11/28/2023	Email communications with D. Robinson regarding proposed order on motion to partially lift stay of litigation (0.1); conference with P. Valori regarding litigation plan as to same (0.2); email communications with Receiver regarding same (0.1); email communications with R. Meshel regarding invoiced evidence through December 31, 2023 (0.1).	MJL	\$350.00	0.50	\$175.00
11/28/2023	Conferences with Rick Zelman regarding quiet title action as to Elite claim and King foreclosure case.	PFV	\$550.00	0.60	\$330.00
11/28/2023	Review email from Prestige insurance company and work on case planning regarding same.	PFV	\$550.00	0.30	\$165.00
11/29/2023	Emails to and from receiver's office regarding next zoom owners' meeting.	rs	\$100.00	0.20	\$20.00
11/29/2023	Analyze memorandum provided by R. Zelman regarding effect of liens upon title to determine whether to include roofers as respondents in partition action (0.2); analyze notice of special set hearing on motion to partially lift stay of litigation (0.1).	MJL	\$350.00	0.30	\$105.00
12/01/2023	Update meeting with lender.	MME	\$550.00	0.50	\$275.00
12/01/2023	Call with counsel for Chubb and review file regarding same (.3); and prepare status report (.2).	PFV	\$550.00	0.50	\$275.00
12/01/2023	Email regarding inquiry from prospective buyer.	PFV	\$550.00	0.20	\$110.00
12/03/2023	Review correspondence from insurance adjuster.	PFV	\$550.00	0.20	\$110.00
12/04/2023	Analyze list of unit owners and related parties to determine rough estimate of units which were rented in preparation of communications with counsel in Thomas Case regarding same (0.4); email communications with Receiver regarding same (0.1); telephone conference with R. Zelman and P. Valori regarding residual interest protected from attachment by judgment creditors and other title related matters related to partition action (0.7).	MJL	\$350.00	1.20	\$420.00
12/04/2023	Confer with M. Damian regarding status and planning as to insurance matters.	PFV	\$550.00	0.20	\$110.00
12/04/2023	Call with Jason Mazer regarding analysis if general liability policy provisions.	PFV	\$550.00	0.30	\$165.00
12/04/2023	Email with Rick Zellman regarding homestead issue.	PFV	\$550.00	0.20	\$110.00
12/04/2023	Review email regarding homestead issues.	PFV	\$550.00	0.20	\$110.00

12/04/2023	Confer with R. Zellman.	PFV	\$550.00	0.70	\$385.00
12/04/2023	(No charge) Meet with co-counsel regarding insurance.	MME		0.20	\$0.00
12/05/2023	Analyze Chubb's correspondence regarding insurance claims concerning pending litigation in preparation of communications with Receiver regarding same (0.2); work on complaint against roofers, et al. with focus on revisions to factual background (0.4); conference with Receiver, P. Valori, and E. Thompson regarding reservation of rights from general liability carrier (0.5).	MJL	\$350.00	1.10	\$385.00
12/05/2023	Review title notes regarding claim of lien.	PFV	\$550.00	0.20	\$110.00
12/05/2023	Email to D. Robinson regarding Prestige matters.	PFV	\$550.00	0.10	\$55.00
12/05/2023	Work on quiet title complaint as to Elite Innovation.	PFV	\$550.00	0.20	\$110.00
12/05/2023	Conference with Receiver regarding status and planning.	PFV	\$550.00	0.50	\$275.00
12/06/2023	Telephone call with J. Mazer regarding potential consultation on reservation of rights from general liability carrier (0.2); email communications with R. Zelman regarding title related matters (0.2); email communications with insurance adjuster assigned to claims in preparation of litigation defense (0.2).	MJL	\$350.00	0.60	\$210.00
12/06/2023	Confer with counsel for Thomas class regarding Prestige insurance position and related matters.	PFV	\$550.00	0.50	\$275.00
12/06/2023	Email with adjuster regarding panel counsel.	PFV	\$550.00	0.10	\$55.00
12/06/2023	Review email from demolition company regarding authorized representative affidavit.	PFV	\$550.00	0.10	\$55.00
12/06/2023	Draft email regarding required modifications to affidavit.	PFV	\$550.00	0.10	\$55.00
12/06/2023	Email with adjuster regarding insurance counsel selection.	PFV	\$550.00	0.10	\$55.00
12/06/2023	Confer with Rick Zelman and email regarding title issues as to judgment creditors claiming lien rights as for claimed homestead properties.	PFV	\$550.00	0.20	\$110.00
12/07/2023	Work on proposed order granting Receiver's third fee application (0.2); email communications with insurer regarding representation of litigation against the Association (0.2); email communications with J. Mazer regarding retainer agreement for review of insurer's reservation of rights letter (0.1).	MJL	\$350.00	0.50	\$175.00
12/07/2023	Email regarding review and analysis of reservation of rights letter from Chubb.	PFV	\$550.00	0.30	\$165.00
12/07/2023	(No charge) Review order granting fee application.	PFV		0.20	\$0.00
12/07/2023	Email regarding retention of coverage counsel.	PFV	\$550.00	0.20	\$110.00
12/08/2023	Email communications with A. Arbaiza regarding tax documents for the upcoming tax year (0.1); email communications with same regarding referral to taxation attorney (0.1).	MJL	\$350.00	0.20	\$70.00
12/08/2023	Email to unit owner regarding unit 112 regarding request for information about ad valorem taxation.	PFV	\$550.00	0.10	\$55.00
12/08/2023	Email regarding coverage counsel retention.	PFV	\$550.00	0.10	\$55.00
12/08/2023	Conference regarding case planning as to offer of defense by Chubb.	PFV	\$550.00	0.20	\$110.00
12/08/2023	Conference regarding case planning as to Prestige cases.	PFV	\$550.00	0.20	\$110.00

12/08/2023	Review email regarding unit 202 passing following owner death.	PFV	\$550.00	0.10	\$55.00
12/08/2023	Review email with insurance adjuster regarding panel counsel availability.	PFV	\$550.00	0.20	\$110.00
12/10/2023	Review coverage counsel retainer agreement.	PFV	\$550.00	0.10	\$55.00
12/10/2023	Review email regarding title issues as to judgments against unit owners.	PFV	\$550.00	0.10	\$55.00
12/10/2023	Draft update email regarding same.	PFV	\$550.00	0.10	\$55.00
12/11/2023	Analyze death certificate of C. Andrews in preparation of telephone conference with R. Zelman regarding amendment to proposed amended complaint for partition (0.1); analyze last will and testament of C. Andrews in preparation of same (0.1); telephone conference with R. Zelman regarding foregoing matters (0.2); work on memorandum to Receiver regarding same (0.7); email communications with Receiver regarding same (0.1).	MJL	\$350.00	1.20	\$420.00
12/11/2023	Review update regarding Unit 202 regarding death of owner.	PFV	\$550.00	0.30	\$165.00
12/11/2023	Draft email regarding amendment to motion to amend and proposed amended complaint.	PFV	\$550.00	0.10	\$55.00
12/11/2023	Draft status report to receiver regarding same.	PFV	\$550.00	0.20	\$110.00
12/12/2023	Work on amended motion for leave to amend complaint for partition with focus on revising the style of the case to reflect the death of C. Andrews (0.2); work on proposed amended complaint with focus on same (0.2); work on list of interested parties to be attached to the proposed amended complaint with focus on beneficiaries of C. Andrews (0.3); conference with R. Landy and P. Valori regarding title matters related to the estate of decedent respondent (0.2).	MJL	\$350.00	0.90	\$315.00
12/12/2023	Conference regarding amendment of partition action as to Unit 202 contingent owners.	PFV	\$550.00	0.20	\$110.00
12/12/2023	Email to and from D. Bissell regarding new posting to website (.2); mass email to owners regarding upcoming zoom meeting with receiver (.3).	rs	\$100.00	0.50	\$50.00
12/13/2023	Email communications with K. Shaw regarding signed retainer agreement for special insurance counsel (0.1); email communications with same regarding the Association's insurance policies (0.2); work on applicant affidavit to be signed by Receiver for Demolition Gods LLC (0.3); email communications with L. Fitzpatrick regarding same (0.2); telephone call with R. Zelman regarding title related matters related to foreclosure action filed by Duetsche Bank against owners of Unit 231, et al. (0.2); work on motion to transfer foregoing foreclosure action (0.4); work on motion to stay or dismiss foregoing foreclosure action (0.7); email communications with Receiver regarding foregoing motions (0.1); work on complaint against roofers, et al. with focus on M. Damian's revisions to same (0.2); email communications with Receiver regarding foregoing complaint (0.2).	MJL	\$350.00	2.60	\$910.00
12/13/2023	Review and revise motion to dismiss and motion to transfer.	PFV	\$550.00	0.30	\$165.00

12/13/2023	Confer with M. Levine regarding case planning as to defense of foreclosure action.	PFV	\$550.00	0.20	\$110.00
12/13/2023	Review email with coverage counsel regarding Thomas case.	PFV	\$550.00	0.10	\$55.00
12/13/2023	Work on affidavit for City of Miami Gardens regarding demolition.	PFV	\$550.00	0.30	\$165.00
12/14/2023	Work on Complaint against roofer regarding removal of untimely lien.	MME	\$550.00	0.30	\$165.00
12/14/2023	Email communications with Receiver regarding complaint against roofer (0.1); email communications with E. Thompson regarding revisions to same (0.1); work on complaint with focus on E. Thompson's revisions to same (0.2); work on civil cover sheet to be filed along with foregoing complaint (0.4); email communications with opposing counsel in foreclosure action regarding hearing on motion to transfer (0.1).	MJL	\$350.00	0.90	\$315.00
12/14/2023	Update regarding status of partition action service of process.	PFV	\$550.00	0.10	\$55.00
12/14/2023	Email to Frank Hornstein regarding consulting request.	PFV	\$550.00	0.10	\$55.00
12/14/2023	Email regarding lien removal claim against roofer.	PFV	\$550.00	0.20	\$110.00
12/14/2023	Review revisions to complaint to discharge lien asserted by roofer.	PFV	\$550.00	0.30	\$165.00
12/14/2023	Email regarding inclusion of two unit owners as to encumbered property.	PFV	\$550.00	0.10	\$55.00
12/15/2023	Email communications with R. Zelman regarding amendments to proposed amended complaint to comply with title underwriter's requirements (0.2); conference with P. Valori regarding same (0.3); work on amended motion for leave to amend proposed amended complaint with focus on foregoing title matters (0.6); analyze updated title commitment in preparation of working on proposed amended complaint (0.3); work on proposed amended complaint with focus on claimed interests of mortgagees pursuant to updated title search (0.8); communications with C. Andrew's daughter regarding contact information of personal representative in preparation of communications with same regarding opening estate (0.2); work on civil coversheet to be submitted with complaint against roofers, et al. (0.2).	MJL	\$350.00	2.60	\$910.00
12/15/2023	Review filing regarding roofer lien and draft instructions regarding service of process and conference with unit owners.	PFV	\$550.00	0.30	\$165.00
12/15/2023	Email regarding database for information regarding diligent search affidavit.	PFV	\$550.00	0.20	\$110.00
12/16/2023	Review correspondence regarding Andrews unit regarding transfer by will of unit owner and impact on partition action.	PFV	\$550.00	0.20	\$110.00
12/17/2023	Email with coverage counsel regarding information request.	PFV	\$550.00	0.10	\$55.00
12/17/2023	Preliminary review of will regarding unit 202.	PFV	\$550.00	0.10	\$55.00

12/18/2023	Email communications with counsel for Deutsche Bank regarding motion to transfer (0.1); email communications with G. Santa Cruz regarding sufficiency of waiver of service of process as to Unit 218/219 signed by power of attorney (0.2).	MJL	\$350.00	0.30	\$105.00
12/18/2023	Email regarding service of unserved unit owners and interest holders regarding preparation for service by publication.	PFV	\$550.00	0.20	\$110.00
12/18/2023	Review email to process service regarding diligent search factual background regarding service by publication.	PFV	\$550.00	0.10	\$55.00
12/18/2023	Email regarding transfer calendar hearing in King case.	PFV	\$550.00	0.10	\$55.00
12/18/2023	Review email from counsel for the bank regarding King case.	PFV	\$550.00	0.10	\$55.00
12/18/2023	(No charge) Emails to and from opposing counsel regarding motion to transfer in the Deutsche Bank v. Shorn A. King, et al. case.	rs		0.20	\$0.00
12/20/2023	Email communications with G. Santa Cruz regarding telephone calls with B. Scott and J. Baptiste concerning tools which belong to the Association (0.2); email communications with counsel for mortgagee regarding partition action (0.1).	MJL	\$350.00	0.30	\$105.00
12/20/2023	Email with lender regarding request to be dismissed.	PFV	\$550.00	0.20	\$110.00
12/20/2023	Conference and email regarding hand tools at property claimed by Mr. Cooper.	PFV	\$550.00	0.20	\$110.00
12/20/2023	(No charge) Draft notice of hearing on motion to transfer in the Deutsche Bank v. Shorn A. King, et al. case.	rs		0.20	\$0.00
12/21/2023	Work on motion to transfer case against roofers from division 04 to division 11 (0.7); work on summons to Elite Innovation Construction Inc. (0.1); work on summons to E. Phillips (0.1); analyze updated case law regarding waivers of service of process in preparation of working on same to be signed by V. Higgs and Y. Barnes as to foregoing case (0.6); communications with foregoing unit owners regarding waivers of service of process in foregoing case (0.4); work on foregoing waivers of service of process to be signed by foregoing unit owners (0.3); work on notice of lawsuit and request for waiver of service of process to be sent to foregoing unit owners (0.4).	MJL	\$350.00	2.60	\$910.00
12/21/2023	Review email regarding waiver of service to unit owners regarding roofer lien.	PFV	\$550.00	0.10	\$55.00
12/21/2023	Confer with M. Levine regarding status and planning.	PFV	\$550.00	0.10	\$55.00
12/21/2023	Email regarding service on remaining unit owners.	PFV	\$550.00	0.20	\$110.00
12/21/2023	Review motion to transfer roofer lien case.	PFV	\$550.00	0.10	\$55.00
12/21/2023	Telephone conference with V. Higgs regarding complaint against roofers (.2); telephone conference with Camille, daughter of Y. Barnes, regarding complaint against roofers (.3); draft waiver of approval (.2); draft notice of lawsuit and request for waiver of service of summons (.1); prepare U.S. mail package to V. Higgs and Y. Barnes regarding complaint against roofers (.3); email to V. Higgs and Y. Barnes regarding same (.2).	rs	\$100.00	1.40	\$140.00

12/22/2023	Analyze updated title search in preparation of working on list of lienholders to be attached to proposed amended complaint for partition (0.4); work on foregoing list with focus on potential claimed interest of mortgagees and citations to official records regarding same referenced in title search, including analysis of such records to determine same (1.2); analyze answers to complaint for partition filed by claimed mortgagees in preparation of continued work on foregoing list with focus on citations to such court filings (0.6); work on foregoing list of lienholders with focus on citations to court filings which reference foregoing potential claimed interest, including analysis of such filings to determine same (0.7); same with focus on potential claimed interest of judgment creditors and citations to official records regarding same, including analysis of such records to determine same (1.4); same with focus on citations to documents in client file which reference foregoing potential claimed interest, including analysis of such documents to determine same (0.4); analyze public records to determine addresses of foregoing lienholders in preparation of continued work on foregoing list (0.7); work on foregoing list with focus on revisions to addresses of lienholders (0.3).	MJL	\$350.00	5.70	\$1,995.00
12/22/2023	Review update regarding service of process in partition case.	PFV	\$550.00	0.10	\$55.00
12/22/2023	Review email regarding waivers of service in lien discharge case.	PFV	\$550.00	0.10	\$55.00
12/23/2023	Conference with P. Valori regarding judgments referenced in updated title search which do not concern unit owners and whether to reference same in updated list of lienholders to be attached to proposed amended complaint for partition (0.2); work on list of lienholders to be attached to the foregoing proposed amended complaint with focus on citations to public records referenced in updated title search (1.6); work on proposed amended complaint with focus on style of the case to include foregoing judgment creditors (0.4); work on list of unit owners to be attached to foregoing proposed amended complaint with focus on revisions as to updated addresses of unit owners (0.4).	MJL	\$350.00	2.60	\$910.00
12/26/2023	Email communications with D. Marin regarding service of process upon respondents in partition action (0.2); work on list of respondents which have been served with focus on revisions related to foregoing email communications in preparation of working on affidavits of diligent search (0.2).	MJL	\$350.00	0.40	\$140.00
12/26/2023	(No charge) Review notice of hearing regarding motion to transfer Elite lien removal case.	PFV		0.10	\$0.00
12/26/2023	Draft email regarding service of notice of hearing with original process package.	PFV	\$550.00	0.10	\$55.00

12/27/2023	Email communications with R. Zelman regarding proposed amended complaint to be attached to the amended motion for leave to amend (0.1); communications with U. Ignorato's spouse regarding service of complaint for partition and declaratory relief (0.2); analyze summonses issued to E. Phillips and Elite Innovation Construction Inc. in preparation of communications with D. Marin regarding service of same (0.1); email communications with D. Marin regarding service of process upon E. Phillips and Elite Innovation Construction Inc. (0.2).	MJL	\$350.00	0.60	\$210.00
12/27/2023	Confer with unit owner regarding response to partition action.	PFV	\$550.00	0.20	\$110.00
12/27/2023	Email to V. Higgs and Y. Barnes following up on waivers (.2); telephone conference with Y. Barnes regarding same (.1).	rs	\$100.00	0.30	\$30.00
12/28/2023	Work on amended motion for leave to amend complaint for partition with focus on revisions to section regarding updated title search (0.3); email communications with R. Meshel regarding invoice for storing evidence and analysis of foregoing invoice (0.2); email communications with V. Higgs regarding waiver of service of process in action against roofers (0.1); analyze foregoing waiver to determine whether it is facial valid in preparation of filing same (0.1).	MJL	\$350.00	0.70	\$245.00
12/28/2023	Reviewing amended complaint on Partition and provide comment (.5); responding regarding evidence storage (.2).	MME	\$550.00	0.70	\$385.00
12/28/2023	Email regarding grounds to defend possible counterclaim.	PFV	\$550.00	0.30	\$165.00
12/28/2023	Review file and confer with counsel for Elite.	PFV	\$550.00	0.80	\$440.00
12/28/2023	Confer with M. Damian regarding status and planning as to Elite dissolution of lien claim.	PFV	\$550.00	0.20	\$110.00
12/28/2023	Review and revised updated motion to amend complaint in partition action.	PFV	\$550.00	0.20	\$110.00
12/28/2023	Review email from V. Higgs regarding waiver of service in lien claim dissolution case.	PFV	\$550.00	0.10	\$55.00
12/29/2023	Email communications with C. Smith regarding Y. Barnes's waiver of service of process in action against roofers (0.1); analyze foregoing waiver to determine whether it is facial valid in preparation of filing same (0.1).	MJL	\$350.00	0.20	\$70.00
				104.50	\$41,410.00

Costs & Expenses

Date	Description	Amount
11/02/2023	Postage	\$0.63
11/07/2023	DLE Court Reporters. Invoice 27378. Certificate of Non Attendance Corporate Rep. Certificate of Non Attendance Elrod Phillips Jr. Appearance C/R of Elite Innovation Construction., Elrod Phillips. 11.7.23	\$195.00
11/11/2023	OTR Legal Process & Courier. Invoice 2023001095. Summons to be served on Annetta M. Henderson, Additional Address, Broward Summons, Copies, Stand by time. 11.11.23	\$279.00
11/15/2023	Postage	\$0.63
11/22/2023	DLE Court Reporters. Invoice 27465. Deposition of C/R of D.J.T.H, LLC. Attendance. No Show. 11.22.23	\$125.00

11/28/2023	Postage- Partition	\$26.16
11/30/2023	Photocopies	\$129.42
11/30/2023	Accurint Research Fee	\$150.63
11/30/2023	Lexis Nexis Advance Legal Research Fee	\$50.02
12/01/2023	Postage	\$0.63
12/08/2023	Postage	\$0.63
12/15/2023	Miami Dade Circuit Court. Filing Complaint against Roof Company Elite Innovation Construction, et al. 12.15.23	\$406.00
12/18/2023	Postage	\$0.63
12/21/2023	OTR Legal Process. Invoice 2023001113. Dade Summons to be served on Alberta Jean, additional attempts, copies. 12.21.23	\$367.00
12/22/2023	Postage	\$7.50
12/23/2023	OTR Legal Process & Courier. Invoice 2023001070. Summons to be served on Ugo Ignorato, copies, Skip Trace, Additional Address, additional attempts. 12.23.23	\$602.00
12/29/2023	Postage	\$0.63
12/31/2023	Webmaster. Post documents, Hosting Renewal for Nov and Dec 2023.	\$45.90
12/31/2023	Photocopies	\$33.12
		\$2,420.53

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Morgan Levine	MJL	70.40	\$350.00	\$24,640.00
Peter Valori	PFV	27.40	\$550.00	\$15,070.00
Peter Valori	PFV	0.30	\$0.00	\$0.00
Melanie Damian	MME	2.60	\$550.00	\$1,430.00
Melanie Damian	MME	0.20	\$0.00	\$0.00
Reesea Saetae	rs	2.70	\$100.00	\$270.00
Reesea Saetae	rs	0.90	\$0.00	\$0.00

Invoice Amount: \$43,830.53

Amount Applied: \$0.00

Balance Due: \$43,830.53



[CLICK TO PAY](#)

Visit: <https://rapidpay.us>
Ref: **220190173892**

Payments Since Last Invoice

Date	Description	Amount
------	-------------	--------



1000 Brickell Ave, Ste 1020
 Miami, FL 33131
 United States
 dvcatorneys.com

INVOICE

Invoice # 242
 Date: 01/31/2024

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

MME1676

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

Services

Date	Description	Staff	Hours	Rate	Amount
01/02/2024	Meet with co-counsel regarding status and strategy (.3); update on demolition (.2).	MME	0.50	\$550.00	\$275.00
01/02/2024	Email communications with R. Zelman regarding proposed amended complaint for partition (0.2); email communications with D. Marin regarding status updated as to service of process upon E. Phillips and Elite Innovation Construction Inc. (0.1); analyze updated case law regarding waiver of service of process to determine whether the file waivers submitted by Y. Barnes and V. Higgs (0.1); analyze updated case law regarding deadline for roofers to show cause as to why their lien should not be dissolved in preparation of working on litigation and discovery plan (0.1); telephone conference with R. Zelman regarding title matters set forth in the amended motion for leave to amend the complaint for partition (0.3); analyze R. Zelman's memorandum regarding same in preparation of working on revisions to proposed amended complaint and exhibits to be attached thereto (0.2); analyze public records referenced in R. Zelman's memorandum in preparation of same (0.4); work on proposed amended complaint with focus on R. Zelman's revisions to same (0.3); work on list of lienholders to be attached thereto with focus on same (0.5); work on list of unit owners to be attached thereto with focus on same (0.2); email communications with Receiver and R. Zelman	MJL	4.20	\$350.00	\$1,470.00

	regarding foregoing revisions and comments as to R. Zelman's memorandum (0.4); work on amended notice of hearing on amended motion for leave to amend the complaint for partition (0.2); analyze witness and exhibit list filed by Prestige Management Solutions, Inc. in preparation of working on Receiver's witness and exhibit list (0.3); analyze case management order in action against Prestige to determine whether experts must be included in witness and exhibit list in preparation of same (0.1); work on Receiver's witness and exhibit list (0.4); work on motion to stay action against Prestige Management Solutions, Inc. (0.2); email communications with Receiver regarding same (0.1); email communications with counsel for Prestige Management Solutions, Inc. regarding proposed order on foregoing motion to stay (0.1).				
01/02/2024	Emails to and from process server regarding status of service on Defendants (.1); receipt and review of executed waivers from Y. Barnes and V. Higgs in case against Elite Innovation (.1); draft notice of filing (second set of waivers) in the partition action (.3).	rs	0.50	\$100.00	\$50.00
01/02/2024	Email regarding service of process matters.	PFV	0.20	\$550.00	\$110.00
01/02/2024	Review Defendant's witness and exhibit lists in Prestige case.	PFV	0.20	\$550.00	\$110.00
01/02/2024	Review correspondence from title lawyer regarding additional modifications to amended complaint.	PFV	0.10	\$550.00	\$55.00
01/02/2024	Review proposed changes to the partition complaint and confer with M. Levine regarding same.	PFV	0.20	\$550.00	\$110.00
01/02/2024	Review notice of filing waivers of service in New World case.	PFV	0.20	\$550.00	\$110.00
01/02/2024	Review and revise motion to stay Prestige case.	PFV	0.10	\$550.00	\$55.00
01/02/2024	Email regarding remaining service of the last remaining defendants from the original group.	PFV	0.30	\$550.00	\$165.00
01/02/2024	Review email regarding tree removal documentation as to demolition permit.	PFV	0.20	\$550.00	\$110.00
01/02/2024	Email with Rick Zelman regarding amendments to the partition complaint.	PFV	0.20	\$550.00	\$110.00
01/03/2024	Revising order on stay of Prestige case.	MME	0.20	\$550.00	\$110.00
01/03/2024	Email communications with J. Downs regarding Receiver's motion to stay proceedings against Prestige Management Solutions, Inc. (0.1); work on proposed agreed order granting foregoing motion (0.4); email communications with J. Downs regarding same (0.1); email communications with R. Zelman regarding proposed amended complaint (0.1); analyze notice of appearance filed on behalf of J. Angel Gererduzzi (0.1);	MJL	0.90	\$350.00	\$315.00

	work on notice of filing waivers of service in action against roofers (0.1).				
01/03/2024	Email with title counsel regarding further amendments to the partition complaint.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Review email regarding agreement to stay of Prestige case.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Email with real estate attorney regarding potential additional changes to amended complaint.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Review email from adjuster regarding defense of Thomas case.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Email with coverage counsel regarding same.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Review notice of appearance regarding Geraduzzi defendant in partition action.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Review proposed order on motion to stay New World v. Prestige case.	PFV	0.10	\$550.00	\$55.00
01/03/2024	Email with Receiver regarding insurance policy analysis status.	PFV	0.10	\$550.00	\$55.00
01/04/2024	Email communications with J. Downs regarding agreed order on motion to stay (0.1); email communications with R. Zelman regarding title underwriter's request to divest judgment creditors of lien rights in the property through the partition action (0.1); telephone conference with R. Zelman regarding same (0.2); analyze Court's notice of cancellation of hearing on motion for leave to amend complaint for partition in preparation of communications with Judicial Assistant regarding same (0.1); conference with P. Valori regarding summons to show cause to be issued in action against roofers (0.1).	MJL	0.60	\$350.00	\$210.00
01/04/2024	Draft notice of filing (waivers) (.2); telephone conference with clerk regarding summons to show cause (.2); draft summons to show cause in case against Elite Innovation (.2); telephone conference with Judge Eig's chambers regarding motion for leave to amend complaint in the partition action (.2).	rs	0.80	\$100.00	\$80.00
01/04/2024	Call with real estate counsel regarding claims as to divestiture of judgment liens.	PFV	0.70	\$550.00	\$385.00
01/04/2024	Prepare status memorandum divestiture of judgment lien rights issues.	PFV	0.20	\$550.00	\$110.00
01/04/2024	Review notice of filing waivers of service as to unit owner defendants in New World v. Prestige case.	PFV	0.10	\$550.00	\$55.00
01/04/2024	Review notice of cancellation of hearing on motion to amend by the court.	PFV	0.10	\$550.00	\$55.00
01/04/2024	Draft email regarding same.	PFV	0.20	\$550.00	\$110.00

01/05/2024	Conference with R. Saetae regarding hearing cancelation of hearing on motion for leave to amend complaint for partition in preparation of communications with judicial assistant regarding same (0.2); work on re-notice of hearing on foregoing motion for leave to amend (0.1); analyze updated case law regarding summons to show cause in preparation of having same issued by the clerk in the action against the roofers (0.2); work on foregoing summons (0.1).	MJL	0.60	\$350.00	\$210.00
01/05/2024	Review file and calls with real estate lawyer and title company regarding title requirements as to partition case.	PFV	0.80	\$550.00	\$440.00
01/05/2024	Call with process server regarding status of service of process in partition case.	PFV	0.20	\$550.00	\$110.00
01/07/2024	Work on motion for summary judgment to be filed in partition action with focus on undisputed facts section.	MJL	1.30	\$350.00	\$455.00
01/07/2024	Draft status memorandum regarding clearing judgment liens from property regarding partition action.	PFV	0.40	\$550.00	\$220.00
01/07/2024	Review email regarding clearing county liens.	PFV	0.10	\$550.00	\$55.00
01/08/2024	Email communications with J. Mazer regarding meeting to discuss insurance related matters.	MJL	0.10	\$350.00	\$35.00
01/08/2024	[Vincenzo Lamonica]: Conduct research regarding special statutory proceedings and issuance of special summons under the Florida Statutes.	pl	1.50	\$150.00	\$225.00
01/08/2024	Confer with clerk regarding issues and summons for special statutory procedure regarding Elite Innovation case.	PFV	0.10	\$550.00	\$55.00
01/08/2024	Review research regarding special procedures summons regarding Elite Innovation case.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Meeting with coverage counsel and e-mail regarding next steps (.8); revising proposed agreed order (.3).	MME	1.10	\$550.00	\$605.00
01/09/2024	Conference with P. Valori regarding summary judgment and other matters necessary to clear title in partition action (0.9); telephone call with D. Marin regarding service of process upon respondents in partition action (0.3); email communications with same regarding same (0.4); analyze notice of appearance of R. Gastesi as to representation of J. Gerarduzzi in preparation of email communications with same regarding representation of B. Gerarduzzi (0.1); email communications with R. Gastesi regarding representation of B. Gerarduzzi and service of process on behalf of same (0.2); email communications with J. Mazer regarding meeting to discuss insurance related matters (0.1); email communications with D. Robinson regarding hearing on motion to partially lift stay (0.1); analyze renotice of	MJL	2.40	\$350.00	\$840.00

	rehearing on motion to lift stay in preparation of hearing on same (0.1); analyze renote of rehearing on motion for leave to amend partition complaint in preparation of hearing on same (0.1); analyze notice of rehearing on status conference in receivership case in preparation of hearing on same (0.1).				
01/09/2024	(No charge) Review Judge Eig's website regarding procedures as to amended motion for leave to file amended complaint (.2); draft letter to Judge Eig regarding same (.2); draft renote of hearing on amended motion for leave to amend complaint (.2); conference with A. Zenovia (.3); draft letter to A. Zenovia in partition action (.2); draft notice of hearing (status conference) in receivership action (.2).	rs	1.30	\$0.00	\$0.00
01/09/2024	Conference regarding planning as to motion to appoint special magistrate based on property being indivisible (.3); and work on analysis of summary judgment motion regarding distribution (1.2).	PFV	1.50	\$550.00	\$825.00
01/09/2024	Email regarding hearing on motion to lift stay in Thomas case.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Review email regarding confirmation with homeowner of non-representation.	PFV	0.20	\$550.00	\$110.00
01/09/2024	Review notice of status conference in main receivership case.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Review notice of hearing on motion to amend in Partition case.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Email regarding request for acceptance of service for B. Gerarduzzi.	PFV	0.20	\$550.00	\$110.00
01/09/2024	Review summary of service of process.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Confer with process server regarding update on service of process upon original Defendants in partition action.	PFV	0.10	\$550.00	\$55.00
01/09/2024	Conference with coverage counsel regarding response to reservation of rights letter as to Thomas matter.	PFV	1.50	\$550.00	\$825.00
01/09/2024	Prepare draft strategy memorandum regarding reservation of rights letter response and process.	PFV	0.60	\$550.00	\$330.00
01/10/2024	Work on motion for summary judgment with focus on undisputed facts regarding loan certificates, including analysis of orders entered in the Receivership Case regarding same (0.4); same with focus on undisputed facts regarding attorneys' fees and costs awarded to Receiver and his law firm, including analysis of orders entered in the Receivership Case regarding same (0.5); same with focus on undisputed facts regarding attorneys' fees and costs awarded to lead counsel, including analysis of orders entered in the Receivership Case regarding same (0.4); same with focus on	MJL	1.60	\$350.00	\$560.00

	undisputed facts regarding attorneys' fees and costs awarded to special counsel, including analysis of orders entered in the Receivership Case regarding same (0.3).				
01/10/2024	Review email regarding hearing on motion to lift stay.	PFV	0.10	\$550.00	\$55.00
01/10/2024	Status conference with M. Damian regarding hearing on motion to amend.	PFV	0.20	\$550.00	\$110.00
01/10/2024	Draft e-mail regarding details of demolition process regarding owner inquiry.	PFV	0.10	\$550.00	\$55.00
01/10/2024	Prepare letter to Ms. Andersen regarding confirmation of non-representation and proposed next steps in partition action.	PFV	0.20	\$550.00	\$110.00
01/10/2024	Review status report regarding insurance coverage issue.	PFV	0.10	\$550.00	\$55.00
01/10/2024	Review amended notice of hearing regarding motion to amend partition complaint.	PFV	0.10	\$550.00	\$55.00
01/10/2024	Review notice of hearing regarding status conference in main receivership case.	PFV	0.10	\$550.00	\$55.00
01/11/2024	Work on summons to be issued to additional respondents named in proposed amended complaint for partition in preparation of service of process upon same (0.2); analyze coverage counsel's memorandum regarding the strategy for the Thomas class in preparation of communications with D. Robinson regarding same (0.1); work on motion for summary judgment to be filed in partition action with focus on undisputed facts regarding unpaid assessments and maintenance fees to the Association, including analysis of financial documents regarding same (0.9); same with focus on undisputed facts regarding loans to the association, including analysis of orders entered in receivership case regarding same (0.7); same with focus on undisputed facts regarding attorneys' fees and costs awarded to the Receiver's professionals, including analysis of orders entered in receivership case regarding same (0.6).	MJL	2.50	\$350.00	\$875.00
01/11/2024	Email with the Receiver regarding response to reservation of rights letter from carrier.	PFV	0.30	\$550.00	\$165.00
01/11/2024	Email with the Receiver regarding response to reservation of rights letter from carrier.	PFV	0.30	\$550.00	\$165.00
01/12/2024	Email communications with D. Marin regarding service of process in partition action.	MJL	0.30	\$350.00	\$105.00
01/12/2024	Email regarding lien special procedure summons.	PFV	0.20	\$550.00	\$110.00
01/15/2024	Email from insurance agent regarding renewal of policy to cover Receiver and counsel and deadline for same, review renewal application and initial application,	KDM	0.20	\$525.00	\$105.00

	emails with M. Levine regarding same, and provide input regarding same.				
01/15/2024	Email communications with J. Downs regarding confirmation of alleged obligations to B. Friedman for collection efforts (0.2); analyze notice of appearance for B. Gerarduzzi (0.1); email communications with D. Marin regarding same and service of process upon initial respondents in partition action (0.1); telephone call with D. Marin regarding service of process upon initial respondents in partition action (0.1); email communications with R. Zelman regarding skip trace on J. St. Germain (0.1); email communications with K. Murena regarding renewal application for receivership insurance (0.1); analyze updated case law regarding final judgment for partition in preparation of continued work on motion for summary judgment (0.9); analyze updated case law regarding appointment of special magistrate in preparation of same (0.8); work on motion for summary judgment with focus on legal descriptions to units 101-143 as set forth in recorded deeds to such units, including analysis of subject deeds, and citations to such deeds (1.8); same with focus on argument regarding petitioner's entitlement to judgment of partition under section 64.041, Florida Statutes (0.6); same with focus on argument regarding other grounds for why summary judgment should be granted as to claim for partition (0.9); same with focus on argument regarding receiver's appointment of special magistrate (0.7); same with focus on argument regarding indivisibility of subject property (0.4).	MJL	6.80	\$350.00	\$2,380.00
01/15/2024	Review court file regarding summons to show cause (.1); email to process server regarding same (.1).	rs	0.20	\$100.00	\$20.00
01/15/2024	Email regarding service of process update in partition case and revision to litigation plan based upon death of Mr. St. Germain.	PFV	0.20	\$550.00	\$110.00
01/15/2024	Email regarding service of order to show cause summons in roofer lien case.	PFV	0.10	\$550.00	\$55.00
01/15/2024	Email regarding revisions to parties regarding Mr. St. Germain estate.	PFV	0.10	\$550.00	\$55.00
01/17/2024	Email regarding taxes.	MME	0.30	\$550.00	\$165.00
01/17/2024	Work on motion for summary judgment to be filed in partition action with focus on argument regarding Receiver's appointment as special magistrate (0.7); same with focus on argument regarding prejudice to unit owners absent partition (0.3); analyze updated case law regarding entry of final summary judgment as to claim for declaratory judgment in preparation of continued work on foregoing motion (0.7); analyze updated case law regarding interpretation of declaration of condominium in preparation of same (0.4); work on	MJL	3.80	\$350.00	\$1,330.00

	foregoing motion for summary judgment with focus on argument regarding claim for declaratory judgment (0.6); same with focus on argument regarding the unambiguous language set forth in section 12.8 of the declaration of condominium (0.7); same with focus on introduction section (0.4).				
01/18/2024	Telephone call with Y. Strader regarding current mailing address for C. Black (0.1); email communications with Y. Strader regarding waiver of service of summons upon same (0.1).	MJL	0.20	\$350.00	\$70.00
01/19/2024	Email communications with J. Downs regarding B. Friedman's claimed attorneys' fees and costs.	MJL	0.10	\$350.00	\$35.00
01/19/2024	Email with counsel for former property manager regarding claim as to legal bill.	PFV	0.20	\$550.00	\$110.00
01/20/2024	Analyze documents provided by former property management company to determine whether former tax returns were provided in preparation of communications with accountant regarding same.	MJL	0.20	\$350.00	\$70.00
01/20/2024	Review email regarding tax document preparation.	PFV	0.10	\$550.00	\$55.00
01/20/2024	Review response to motion to stay in foreclosure case regarding Deutsche bank and draft email regarding points for reply (.3); and confer with M. Levine regarding same (.2).	PFV	0.50	\$550.00	\$275.00
01/20/2024	Email regarding St.Germain issue regarding partition action.	PFV	0.20	\$550.00	\$110.00
01/21/2024	Email communications with Receiver regarding J. Down's confirmation concerning obligations for attorneys' fees and costs to B. Friedman in preparation of paying same (0.1); email communications with same regarding potential settlement of Thomas class action (0.1).	MJL	0.20	\$350.00	\$70.00
01/22/2024	Work on proposed order granting leave to amend complaint for partition (0.2); conference with R. Saetae regarding summonses to be issued as to newly added respondents (0.2); email communications with D. Marin regarding service of summons to show cause upon Elite Innovation Construction, Inc. (0.1).	MJL	0.50	\$350.00	\$175.00
01/22/2024	Preparing for and attending hearing on the motion to amend partition action.	MME	0.50	\$550.00	\$275.00
01/22/2024	Email regarding Freidman (former law firm) demand for payment and response.	PFV	0.30	\$550.00	\$165.00
01/22/2024	Email with Receiver and coverage counsel regarding implementation of plan as to Thomas insurance matters.	PFV	0.20	\$550.00	\$110.00
01/22/2024	Review Barnes waiver in partition action.	PFV	0.10	\$550.00	\$55.00

01/22/2024	Email regarding service on existing defendant group and plan for service of newly added defendants.	PFV	0.20	\$550.00	\$110.00
01/22/2024	Email regarding service of Ignorato subpoena.	PFV	0.10	\$550.00	\$55.00
01/22/2024	Review email regarding cancellation of county liens.	PFV	0.10	\$550.00	\$55.00
01/22/2024	Email regarding status of service of process on defendants in Elite Innovation lien challenge case.	PFV	0.10	\$550.00	\$55.00
01/23/2024	Conference with unit owners via Zoom regarding update on receivership, title, and partition matters (0.6); analyze documents provided by former accountant of Association to determine whether taxes were filed for Association in 2021 and 2022 in preparation of communications with current accountant regarding same and filing 2023 tax returns (0.3); analyze prior communications with former accountant and D. Brooks regarding same in preparation of same (0.2); email communications with M. Dhanji regarding same in preparation of same (0.1).	MJL	1.20	\$350.00	\$420.00
01/23/2024	Prepare for (.3); and attend (.4); member meeting.	PFV	0.70	\$550.00	\$385.00
01/24/2024	Work on plan to effectuate service of process upon original group of respondents in partition action, including analysis of service list (0.6); email communications with Y. Strader following up on whether C. Black is willing to sign a waiver of service of process in the partition action (0.1); analyze comprehensive business report for Rusol & Co., Inc. in preparation of email communications with D. Marin regarding service of process upon same (0.2); analyze comprehensive report on registered agent of foregoing company in preparation of same (0.2); email communications with D. Marin regarding service of process upon foregoing company (0.1); conference with R. Saetae regarding summonses to be issued to new group of respondents named in amended complaint for partition and plan to effectuate service upon such respondents (0.9).	MJL	2.10	\$350.00	\$735.00
01/24/2024	Review update on service of process on remaining first group respondents in partition action and prepare instructions as to remaining service as well as new group.	PFV	0.30	\$550.00	\$165.00
01/24/2024	Review return of service of process in New World v. Elite Innovation case.	PFV	0.10	\$550.00	\$55.00
01/25/2024	Conference with P. Valori regarding diligent effort to obtain address of J. Lawson and need to order skip trace on same to effectuate service of process.	MJL	0.20	\$350.00	\$70.00
01/25/2024	Review response to motion to transfer filed by Deutsche Bank and prepare summary for reply argument of key points.	PFV	0.40	\$550.00	\$220.00

01/26/2024	Analyze Deutsche Bank's response to the Receiver's motion to transfer in preparation of working on reply in support of same (0.2); work on outline of arguments to be raised in foregoing reply in preparation of same (0.3); work on foregoing reply with focus on argument regarding foreclosure proceeding being related to the main receivership case and related partition action (0.4); same with focus on argument regarding no delay resulting from transfer (0.7); email communications with counsel for Deutsche Bank regarding hearing on Receiver's motion to transfer (0.1); email communications with same regarding proposed agreement to stay foreclosure proceeding (0.1).	MJL	1.80	\$350.00	\$630.00
01/26/2024	Email with counsel for Deutsche Bank regarding potential stay and motion to transfer.	PFV	0.20	\$550.00	\$110.00
01/26/2024	Email with demolition company regarding status of permitting regarding demolition.	PFV	0.20	\$550.00	\$110.00
01/27/2024	Meet with unit owner at the property to retrieve possessions.	pl	5.50	\$120.00	\$660.00
01/29/2024	Analyze return of service upon Elite Innovation Construction Inc. to determine date in which service was effectuated upon same in preparation of working on motion for entry of clerk's default against same (0.1); work on foregoing motion (0.3); work on proposed clerk's default to be attached thereto (0.2); analyze return of service upon E. Phillips to determine date of service upon same in preparation of working on motion for entry of clerk's default against same (0.1); work on foregoing motion (0.1); work on proposed clerk's default to be attached thereto (0.1); telephone conference with R. Zelman regarding service upon respondents added to amended complaint, summary judgment, decedent unit owner, and other title related matters (0.9); analyze most recent title commitment to determine whether nominees are named interest holders within same in preparation of working on summonses as to service of amended complaint upon newly added respondents (0.2); work on foregoing summonses in preparation of effectuating service upon same (0.2); work on summonses to respondents which were added to the amended complaint in preparation of effectuating service upon same (0.5).	MJL	2.70	\$350.00	\$945.00
01/29/2024	Review file and confer with M. Levine regarding motions for clerk's defaults in Elite case and motion to transfer regarding same.	PFV	0.30	\$550.00	\$165.00
01/29/2024	Review and revise motion for clerk's default as to Elrod Phillips.	PFV	0.20	\$550.00	\$110.00
01/30/2024	Work on reply in support of motion to transfer foreclosure action (0.6); email communications with counsel for plaintiff in foreclosure action regarding	MJL	1.60	\$350.00	\$560.00

plaintiff's lack of opposition to stay and transfer (0.1); analyze clerks default against Elite Innovation Construction Inc. in preparation of hearing on motion to transfer (0.1); analyze notice of non-entry of default as to E. Phillips in preparation of same (0.1); work on non-military affidavit as to E. Phillips as required to obtain clerks default against same in preparation of same (0.3); work on submitting return of service and non-military affidavit to the Court in preparation of amending motion for clerk's default against E. Phillips (0.2); work on amended motion for default against E. Phillips (0.2).

01/30/2024	(No charge) Telephone conference with M. Levine regarding amended complaint in the partition action.	rs	0.50	\$0.00	\$0.00
01/30/2024	Work on reply in support of motion to transfer regarding foreclosure as to unit 231.	PFV	0.90	\$550.00	\$495.00
01/30/2024	Email with demolition company regarding status of permitting.	PFV	0.10	\$550.00	\$55.00
01/31/2024	Emails regarding stay motion and insurance issues.	MME	0.40	\$550.00	\$220.00
01/31/2024	Appear at hearing on motion to transfer foreclosure action (0.2); appear at hearing on motion to transfer case against roofers (0.1); work on summonses to be issued to new group of respondents in partition action (0.5).	MJL	0.80	\$350.00	\$280.00
01/31/2024	Draft a proposed order on the Receiver's motion to dismiss or stay litigation in Deutsche Bank v. King (.6); research regarding default judgment in an action against Elite Innovation Construction, Inc. (.2).	JS	0.80	\$295.00	\$236.00
01/31/2024	Prepare for (.1); and attend (.4); hearing on motion to transfer case as to New World v. Elite Innovation case, review order transferring case (.1); and prepare update to Receiver regarding same and clerk's defaults as to defendants (.1).	PFV	0.70	\$550.00	\$385.00
01/31/2024	Prepare for hearing on motion to transfer Duetsche Bank v. King case (.2); and email with counsel for the bank regarding same (.1); and review transfer order (.1); and draft status email to receiver (.1).	PFV	0.50	\$550.00	\$275.00

Quantity Subtotal 69.8

Services Subtotal \$26,211.00

Expenses

Type	Date	Description	Quantity	Rate	Amount
Expense	01/04/2024	Postage	2.00	\$0.63	\$1.26
Expense	01/05/2024	OTR Legal Process. Invoice 2024000001. Rush	1.00	\$107.60	\$107.60

Summons to be served on Elite Innovations Construction Inc. Copies 01.05.24					
Expense	01/05/2024	OTR Legal Process. Invoice 2024000002. Rush summons to be served on Elrod A. Phillips, Copies. 01.05.24	1.00	\$107.60	\$107.60
Expense	01/09/2024	Miami Dade Clerk of the court. Filing Civil Action Summons. 01.09.23	1.00	\$15.00	\$15.00
Expense	01/09/2024	OTR Legal Process. Invoice 2023001069. Summons to be served on Emma J. Williams, copies, additional Attempts, Skip Trace 01.09.24	1.00	\$422.00	\$422.00
Expense	01/10/2024	Ouellette & Mauldin. Court Reporters. Invoice 974951. Copy of Transcript from hearing on 10.31.23 Josue Cepero & Letecia Cepero. 01.10.24	1.00	\$102.00	\$102.00
Expense	01/10/2024	Postage	1.00	\$0.63	\$0.63
Expense	01/11/2024	Postage	1.00	\$0.63	\$0.63
Expense	01/12/2024	OTR Legal Process. Invoice 2024000007. Summons to be served on Beneficial Florida Inc. c/o Stanley Erski, Registered Agent, copies, additional Address out of state. Non-Serve 01.12.24	1.00	\$279.00	\$279.00
Expense	01/15/2024	OTR Legal Process. Invoice 2023001073. Summons to be served on Jean Yvon ST. German, copies. Skip Trace - Non-Served - 01.15.24	1.00	\$257.00	\$257.00
Expense	01/15/2024	OTR Legal Process. Invoice 2024000010. Summons to be served on Jose Gerarduzzi, copies, additional address. Non-Served. 01.15.24	1.00	\$117.00	\$117.00
Expense	01/15/2024	OTR Legal Process. Invoice 2024000011. Summons to be served on Barbara Gerarduzzi, copies, additional address. Non-Served. 01.15.24	1.00	\$117.00	\$117.00
Expense	01/18/2024	OTR Legal Process. Invoice 2024000008. Summons to be served on Eliteway Capital Investments, LLC c/o Registered Agent, Issac Champagne, copies. Non-Served 01.18.24	1.00	\$62.00	\$62.00
Expense	01/18/2024	OTR Legal Process & Courier. Invoice 2024000006. Rush summons to be served on Elite Innovation Construction Inc. c/o Elrod A. Phillips. 01.18.24	1.00	\$106.00	\$106.00
Expense	01/22/2024	FedEx. Invoice 36565. City of Miami Gardens. Demolition Check.	1.00	\$11.10	\$11.10
Expense	01/31/2024	Accurint Research Fee	1.00	\$159.27	\$159.27
Expense	01/31/2024	Lexis Nexis Research Fee	1.00	\$168.15	\$168.15
Expense	01/31/2024	Postage	1.00	\$0.64	\$0.64
Expense	01/31/2024	Photocopies	70.00	\$0.25	\$17.50

Expenses Subtotal \$2,051.38

Name	Hours	Rate	Amount
Melanie Damian	3.0	\$550.00	\$1,650.00
Morgan Levine	36.7	\$350.00	\$12,845.00
Kenneth Murena	0.2	\$525.00	\$105.00
Law Clerk/ Paralegal (Vincenzo Lamonica)	1.5	\$150.00	\$225.00
Law Clerk/ Paralegal (Dan Jellema)	5.5	\$120.00	\$660.00
Joseph Seara	0.8	\$295.00	\$236.00
Peter Valori	18.8	\$550.00	\$10,340.00
Reesea Saetae	1.5	\$100.00	\$150.00
Reesea Saetae (No charge)	1.8	\$0.00	\$0.00
Quantity Total			69.8
Subtotal			\$28,262.38
Amount			\$28,262.38

Statement of Account

Outstanding Balance New Charges Payments Received **Total Amount Due from 11/1/23-1/31/24**
 (\$43,830.53 + \$28,262.38) - (\$0.00) = **\$72,092.91**

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
23988	12/312023	\$43,830.53	\$0.00	\$43,830.53

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
242	01/31/2024	\$28,262.38	\$0.00	\$28,262.38

Outstanding Balance from 11/1/23-12/31/23	\$43,830.53
Total Amount Due from 11/1/23-1/31/24	\$72,092.91

Please make all amounts payable to: Damian Valori Culmo

Payment is due upon receipt.

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

December 15, 2023
ID: GERSP 1299620
Invoice No. 21471323
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH November 30, 2023

Fees For Professional Services:	\$3,580.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,580.00

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>
11/02/23	Review answer from US Bank Trustee .2; review and respond to Peter Valori email re: bank issue .1; review and respond to Peter Valori email re: negotiation .1	DMG2	0.40
11/03/23	Review Rick Zelman letter re: Simpson judgment .1	DMG2	0.10
11/06/23	Review and respond to Peter Valori email with multiple attachments re: insurance coverage .2	DMG2	0.20
11/07/23	Review and respond to Peter Valori and Melanie Damian email re: strategy re: Prestige .1; review and respond to Rick Zelman email re: demolition .1; review Peter Valori email to Rick Zelman re: strategy .1; review and respond to Rick Zelman email re: sale of units .1; review and respond to Peter Valori email re: affidavit .1	DMG2	0.50
11/09/23	Review Rick Zelman email re: title issues for clarification .1; review Rick Zelman email re: Hunter judgment issue .1	DMG2	0.20
11/10/23	Review and respond to Morgan Levine email re: sales .1	DMG2	0.10
11/13/23	Review Morgan Levine email re: billing .1	DMG2	0.10
11/14/23	Review and respond to Morgan Levine re: Duetche Bank .1; review Nicole Banfi email re: insurance .1; review email for Peter Valori re: D & O insurance policy .1; review and respond to Morgan Levine email with draft report for review and editing .4; review Morgan Levine email with Zelman letter to County re: liens .1; review and respond to Morgan Levine emails re: report .1	DMG2	0.90
11/14/23	Analyze draft of Receiver's Third Report and Application for Order Authorizing Payment of Fees and Expenses (drafted by independent counsel, Peter Valori, Esq.), 13 pages	ERT	0.20
11/15/23	Review Rick Zelman email re: Simpson affidavit .1	DMG2	0.10
11/16/23	Review and respond to Mary Danjhi email re: access to property post storm	DMG2	0.10
11/17/23	Review and respond to Peter Valori email re: safe access .1; review and respond to Daniel Jellema email re: safety .1; review and respond Morgan Levine email with draft amended complaint for review .3	DMG2	0.50

11/17/23	Analyze draft Motion for Leave to Amend Complaint (drafted by independent counsel, Morgan Levine, Esq.), 3 pages	ERT	0.10
11/18/23	Review and respond to Morgan Levine emails re: complaint .1	DMG2	0.10
11/20/23	Review order on receiver's motion for extension .1	DMG2	0.10
11/21/23	Review and respond to Rick Zelman email re: liens .1	DMG2	0.10
11/24/23	Review Peter Valori email re: insurance coverage .1	DMG2	0.10
11/27/23	Review Reesa Setae email re: court hearing .1; conference with Peter Valori and Eric Thompson re: partition case status .4	DMG2	0.50
11/27/23	Attend (remotely, via Zoom) with D. Gersten and independent counsel (Peter Valori, Esq.) regarding pending action items and strategy going forward with regard to same	ERT	0.40
11/29/23	Review Rick Zelman email with memo re: claim of lien .1; review and respond to Reesa Setae email re: next zoom with homeowners .1; review filings in case .1	DMG2	0.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	4.40	3,300.00
ERT	Eric Thompson	Partner	400.00	0.70	280.00

TOTAL FOR SERVICES **\$3,580.00**

Outstanding Statements as of December 15, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 21471323

December 15, 2023
Page 4

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Statement No 21424056	October 12, 2023	\$4,275.00
Statement No 21445391	November 13, 2023	\$2,720.00
Total Accounts Receivable Balance:		\$58,759.97

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

December 15, 2023
ID: GERSP 1299620
Invoice No. 21471323
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH November 30, 2023

Fees For Professional Services:	\$3,580.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,580.00

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: 21471323

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

January 26, 2024
ID: GERSP 1299620
Invoice No. 21497136
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH December 31, 2023

Fees For Professional Services:	\$3,400.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,400.00

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>
12/01/23	Review and respond to Nicole Baffi re: D&O .1	DMG2	0.10
12/03/23	Review and respond to Peter Valori email re: conference .1	DMG2	0.10
12/04/23	Review and respond to Rick Zelman email re: homestead .1; review and respond to Peter Valori re: conference .1; review Rick Zelman/Peter Valori email re: homestead .1	DMG2	0.30
12/05/23	Conference with Peter Valori, Eric Thompson and Morgan Levine re: insurance issue .5; review lengthy document/letter from insurance counsel .6	DMG2	1.10
12/05/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Peter Valori, Esq. and Morgan Levine, Esq.) to discuss strategy with regard to the defense (under a reservation of rights) recently provided by the Association's insurers Westchester Surplus Lines Ins. Co. and ACE Property and Casualty Ins. Co.	ERT	0.50
12/06/23	Review and respond to Nicole Balfi email re: counsel .1; review and respond to Rick Zelman re: bill .1; review and respond to Nicole Banfi email re: insurance panel .1; review and respond to Peter Valori email re: lawyer .1; review and respond to Melanie Damain email re: bill .1	DMG2	0.50
12/07/23	Review and respond to Reese Setae re: filing .1; review and respond to Nicole Banfi email re: counsel .1; review and respond to Peter Valori re: reservation letter .1	DMG2	0.30
12/10/23	Review email from Peter Valori with attached retainer agreement .2; review email from Peter Valori re: homestead .1	DMG2	0.30
12/11/23	Review court order re: case management .1; review and respond to Peter Valori email re: passing of Mr. Andrews .1; review and respond to Nicole Banfi email re: ROR counsel .1	DMG2	0.30
12/13/23	Review and respond to Morgan Levine email with draft complaint for review and approval .3	DMG2	0.30
12/13/23	Analyze and revise draft Complaint against Elite Innovation Construction Inc., Elrod Phillips, Volrick Higgs and Vyonne Barnes (drafted by independent counsel, Morgan Levine, Esq.), 9 pages	ERT	0.40
12/14/23	Conference with Eric Thompson re: new complaint .1; review and	DMG2	0.30

respond to Rick Zelman/Peter Valori email re: legal points and Fund Commitment .2

12/14/23	Email correspondence with independent counsel (Morgan Levine, Esq.) regarding our revisions to her draft Complaint against Elite Innovation Construction Inc., Elrod Phillips, Volrick Higgs and Vyonne Barnes	ERT	0.10
12/21/23	Review order of dismissal .1	DMG2	0.10
12/27/23	Review and respond to Morgan Levine email with multiple attachments for review and approval .3	DMG2	0.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	4.00	3,000.00
ERT	Eric Thompson	Partner	400.00	1.00	400.00

TOTAL FOR SERVICES **\$3,400.00**

Outstanding Statements as of January 26, 2024

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Statement No 21424056	October 12, 2023	\$4,275.00
Statement No 21445391	November 13, 2023	\$2,720.00
Statement No 21471323	December 15, 2023	\$3,580.00

Total Accounts Receivable Balance: **\$62,339.97**

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 21497136

January 26, 2024
Page 4

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

January 26, 2024
ID: GERSP 1299620
Invoice No. 21497136
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH December 31, 2023

Fees For Professional Services:	\$3,400.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$3,400.00

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: 21497136

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

February 7, 2024
ID: GERSP 1299620
Invoice No. 21503476
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH January 31, 2024

Fees For Professional Services:	\$2,715.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,715.00

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>
01/02/24	Conference with Peter Valori re: stay .1; review and respond to Morgan Levine re: complaint .1; review Rick Zelman email re: underwriter issues .1	DMG2	0.30
01/03/24	Review and respond to Rick Zelman email re: complaint issues .2; review email with court waivers .1; review and respond to Nicole Balfi email re: coverage .1	DMG2	0.40
01/05/24	Review and respond to Rick Zelman email with letter	DMG2	0.10
01/08/24	Review order from court .1	DMG2	0.10
01/11/24	Review Peter Valori email re: discussions .1; review and respond to Eric Thompson email re: Peter Valori email .1	DMG2	0.20
01/15/24	Review and respond top Reesa Setae email re: insurance .1; review and respond to Peter Valori email re: show cause .1	DMG2	0.20
01/16/24	Review and forward Eric Thompson email to Peter Valori re: agreement .1	DMG2	0.10
01/17/24	Review Reesa Setae email re: amended complaint .1	DMG2	0.10
01/19/24	Conference Melanie Damian re: tax return .1; conference with Jacqueline Greenberg CPA re: tax return .1; email to Mary Dhanji re; tax return .1	DMG2	0.30
01/20/24	Review and respond to Peter Valori email re: strategy .1	DMG2	0.10
01/22/24	Review and respond to Maty Dhanji email re: financial documents .1; review and respond to CPA inquiry re: filing of return .1	DMG2	0.20
01/23/24	Review Mary Danjhi email re: tax filing .1; review court order .1; zoom conference with homeowners for update .5	DMG2	0.70
01/23/24	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Peter Valori, Esq.) and homeowners regarding status of partition action and other issues	ERT	0.60
01/26/24	Review and respond to Mary Dhanji/CPA emails re: tax filing .1; review and respond to CPA re: tax filing .1	DMG2	0.20

01/29/24	Review and respond to CPA email with attached acceptance forms .1	DMG2	0.10
01/31/24	Review and respond to Peter Valori email re: default .1; reveiw and respond to Peter Valori email re: transfer agreement .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	3.30	2,475.00
ERT	Eric Thompson	Partner	400.00	0.60	240.00

TOTAL FOR SERVICES **\$2,715.00**

Outstanding Statements as of February 7, 2024

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Statement No 21424056	October 12, 2023	\$4,275.00
Statement No 21445391	November 13, 2023	\$2,720.00
Statement No 21471323	December 15, 2023	\$3,580.00
Statement No 21497136	January 26, 2024	\$3,400.00

Total Accounts Receivable Balance: \$65,739.97

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

February 7, 2024
ID: GERSP 1299620
Invoice No. 21503476
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH January 31, 2024

Fees For Professional Services:	\$2,715.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,715.00

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: 21503476

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

Composite Exhibit 3

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

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

November 25, 2023
Invoice Number 113115

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

PROFESSIONAL SERVICES

			Hours
09/29/23	RMZ	Review Affidavits for Units 226/227; Zilphia Anderson.	0.30
10/30/23	RMZ	Review service of process list and title commitment; telephone call with Morgan Levine, Esq.	2.90
10/31/23	RMZ	Telephone call with Morgan Levine, Esq; review service of process list and related.	2.40
11/01/23	RMZ	Preparation of correspondence to Attorney's Title regarding Unit 110 judgments; conference with Iris Castillo regarding Non-ID Affidavits.	0.30
11/02/23	RMZ	Review County Violation list.	0.30
11/02/23	RMZ	Review James Simpson judgments for units 220-221/223-224; review and revise Non-ID Affidavit; review correspondence from Morgan Levine,	0.40

Invoice 113115

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

Esq.

11/03/23	RMZ	Review Amended Complaint and related Condominium Declaration provisions; calls to Morgan Levine, Esq.	1.50
11/03/23	IC	Preparation of Non-Identity Affidavits; review Judgments attached to Affidavits.	3.20
11/06/23	RMZ	Review title insurance commitment; Non-ID Affidavits and related requirements; prepare correspondence to Debra Ullman, Esq. of the Fund; prepare correspondence to Morgan Levine, Esq; calls to Morgan Levine, Esq.	2.80
11/06/23	IC	Conference with Richard M. Zelman; review of Title Commitment regarding judgments and items which must be cleared.	2.00
11/07/23	RMZ	Review correspondence from David Gersten, Esq; correspondence from Peter Valori; review title notes regarding liens; prepare correspondence to Deb Ullman of Attorneys Title Insurance Fund.	1.10
11/07/23	IC	Research all code enforcement liens.	2.50
11/08/23	RMZ	Conference with Iris Castillo regarding county liens and corrective procedures.	0.30

November 25, 2023

Page 3

Invoice 113115

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

11/08/23	IC	Continue research concerning code enforcement liens, review of title commitment vs. code enforcement liens.	2.50
11/09/23	RMZ	Telephone call with Morgan Levine, Esq; conference with Iris Castillo regarding county liens; prepare correspondence to Attorney's Title regarding title liens; prepare correspondence to Deb Ullman, Esq.	1.80
11/09/23	IC	Preparation of correspondence to Unit Owners regarding Non-Identity Affidavits and judgment searches.	3.50
11/10/23	RMZ	Preparation of additional correspondence to Deb Ullman, Esq. regarding Notice of Commencement and lien.	0.30
11/13/23	RMZ	Telephone call with Deb Ullman, Esq. regarding liens, etc; prepare correspondence to Miami-Dade County Finance Department; telephone call with Monica Rizo, Esq, Assistant County Attorney.	1.40
11/14/23	RMZ	Review and revise correspondence to Miami-Dade County Finance Department.	0.30
11/14/23	RMH	Confer with RMZ and review title insurance commitment re bankruptcy case, review bankruptcy docket sheet and applicable court papers re requirement #27, call with RMZ re same	0.80

November 25, 2023

Page 4

Invoice 113115

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

11/15/23	RMZ	Telephone call with Volrick Higgs; telephone call with Iris Castillo (2); prepare correspondence to Morgan Levine, Esq. regarding service of process; telephone call with Morgan Levine, Esq.	0.50	
11/16/23	RMZ	Telephone call with Denecia Jefferies of the Finance Department, Miami-Dade County.	0.20	
11/17/23	IC	Review Affidavits; send Affidavits to Condo Unit Owners; review Title Commitment to verify Judgments; review Affidavits received to date.	4.50	
11/21/23	RMZ	Telephone call with Jack Galindo, Miami-dade County Finance Department; prepare correspondence to Morgan Levine, Esq; calls and correspondence to Jack Galindo; calls and correspondence to Daryl Weaver, Finance Department; telephone call with Deb Ullman of the Fund Title Insurance Company regarding homestead/judgment attachments.	1.40	
		TOTAL HOURS AND FEES	37.20	11,680.00

DISBURSEMENTS

10/12/23		Simplifile		70.00
10/12/23		Recording Fees		90.30
		TOTAL COST		160.30

November 25, 2023

Page 5

Invoice 113115

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

TOTAL STATEMENT

11,840.30

Fee Summary

Hours

Amount

Richard M. Zelman

18.20

9,009.00

Roy M. Hartman

0.80

396.00

Iris Castillo

18.20

2,275.00

Total Fees

37.20

11,680.00

10/25/23

PREVIOUS BALANCE

7,198.35

TOTAL STATEMENT

11,840.30

NEW BALANCE

19,038.65

Accounts Receivable Aging

Current

11,840.30

30 Days

2,504.10

60 Days

2,097.00

90 Days

2,597.25

120 Days

0.00

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

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

December 25, 2023
Invoice Number 113152

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

PROFESSIONAL SERVICES

			Hours
12/04/23	RMZ	Telephone call with Deb Ullman, Esq. regarding Homestead and Judgment attachments; prepare correspondence to Gersten, et al; telephone call with Peter Valori and Morgan Levine.	1.20
12/05/23	RMZ	Preparation of correspondence to Deb Ullman, Esq. regarding judgment creditors; telephone conference with Roy M. Hartman regarding related litigation procedure; correspondence to Peter Valori, Esq.	0.50
12/05/23	RMH	Confer with RMZ re judgment creditor issue, review draft letter re same, call with RMZ re same	0.50
12/06/23	RMZ	Telephone call with Peter Valori, Esq; review and revise correspondence to Deb Ullman regarding requirements; conference with Iris Castillo regarding County liens.	0.60

Invoice 113152

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

12/11/23	RMZ	Review Will of Cardinal Andrews of Unit 202; review Death Certificate, title notes regarding spouse "elective shares"; application of "summary probate"; telephone call with Morgan Levine, Esq.	0.90	
12/14/23	RMZ	Review correspondence from Daryl Weaver; prepare correspondence to Daryl Weaver of Miami-Dade County.	0.30	
12/14/23	RMZ	Telephone call with Deb Ullman, Esq. and Brian Stringer, Esq. of the Fund regarding judgment creditors; prepare email to Morgan Levine, Esq. regarding Complaint, service on judgment holders, etc.	0.90	
TOTAL HOURS AND FEES			4.90	2,425.50

DISBURSEMENTS

09/06/23	Simplifile			20.42
10/02/23	FedEx			29.10
TOTAL COST				49.52

TOTAL STATEMENT 2,475.02

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	4.40	2,178.00
Roy M. Hartman	0.50	247.50
Total Fees	4.90	2,425.50

December 25, 2023

Page 3

Invoice 113152

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

11/25/23	PREVIOUS BALANCE	19,038.65
12/20/23	PAYMENT -THANK YOU-	-7,198.35
	TOTAL STATEMENT	2,475.02
	<u>NEW BALANCE</u>	<u>14,315.32</u>

Accounts Receivable Aging

Current	2,475.02
30 Days	11,840.30
60 Days	0.00
90 Days	0.00
120 Days	0.00

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

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

January 25, 2024
Invoice Number 113175

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

PROFESSIONAL SERVICES

			Hours
12/27/23	RMZ	Conference with Iris Castillo regarding requirements; prepare correspondence to Miami-Dade regarding violations, correspondence to Morgan Levine, Esq. regarding Unit 202.	1.40
12/29/23	RMZ	Review Amended Complaint and named parties regarding title insurance commitment; conference with I.C.; prepare correspondence to Morgan Levine, Esq.	3.20
12/29/23	IC	Conference with Richard M. Zelman, Esq. regarding named parties; review title commitment requirements.	2.50

01/02/24	RMZ	Review correspondence from Morgan Levine, Esq; review title commitment; review and revise correspondence to Morgan Levine, Esq. regarding Complaint, review Unit 142 and 215 judgments.	1.20
01/03/24	RMZ	Review correspondence from Peter Valori, Esq; telephone call with Brian Stringer of the Fund.	0.30
01/04/24	RMZ	Telephone call with Brian Springer, Esq. of Attorneys Title Fund; correspondence to Jack Galino, Finance Department of Miami-Dade County; telephone call with Morgan Levine, Esq.	0.90
01/05/24	RMZ	Telephone call with Peter Valori, Esq; conference call with Deb Ullman, Esq, Brian Stringer, Esq, and Peter Valori, Esq; telephone call with Jack Galindo of Miami-Dade County Finance Department; prepare correspondence to Jack Galindo.	1.80
01/05/24	IC	Review Code Enforcement Liens.	1.00
01/10/24	IC	Review Affidavits; review Judgment searches.	1.30
01/11/24	RMZ	Conference with Iris Castillo regarding Marital Settlement Agreements and related.	0.20
01/11/24	IC	Review Affidavits/Judgments; review Title Insurance Commitment; correspondence to Unit Owners regarding Affidavits.	2.50

January 25, 2024

Page 3

Invoice 113175

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

TOTAL HOURS AND FEES 16.30 5,367.50

TOTAL STATEMENT 5,367.50

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	9.00	4,455.00
Iris Castillo	7.30	912.50
Total Fees	16.30	5,367.50

12/25/23	PREVIOUS BALANCE	14,315.32
	Total this Bill	5,367.50
	<u>NEW BALANCE</u>	<u>19,682.82</u>

Accounts Receivable Aging

Current	5,367.50
30 Days	2,475.02
60 Days	11,840.30
90 Days	0.00
120 Days	0.00

Composite Exhibit 4



CIMO | MAZER | MARK

LAW GROUP

255 Alhambra Circle
Suite 1160
Coral Gables, Florida 33134
www.cmmlawgroup.com
305-374-6484 TEL
305-374-6488 FAX
TAX ID # 82-4440926

January 07, 2024

David Gersten, Receiver
1000 Brickell Avenu, Suite 1020
Miami, FL 33131

New World

Billing Through 12/31/2023
Invoice # 1277
1239 0001

FOR PROFESSIONAL SERVICES RENDERED

12|21|2023 JRA Review and analyze coverage letter for purposes of coverage analysis 0.50

Timekeeper	Hours	Rate	Amount
Alhalel, Joshua R.	0.50	575.00	\$287.50
Total fees for this matter	0.50		\$287.50

DISBURSEMENTS

BILLING SUMMARY

TOTAL FEES	\$287.50
Balance Forward	\$0.00
TOTAL CHARGES FOR THIS BILL	\$287.50



CIMO | MAZER | MARK

LAW GROUP

255 Alhambra Circle
Suite 1160
Coral Gables, Florida 33134
www.cmmlawgroup.com
305-374-6484 TEL
305-374-6488 FAX
TAX ID # 82-4440926

February 08, 2024

David Gersten, Receiver
1000 Brickell Avenue, Suite 1020
Miami, FL 33131

New World

Billing Through 01/31/2024
Invoice # 1283
1239 0001

FOR PROFESSIONAL SERVICES RENDERED

Table with 4 columns: Date, Initials, Description, and Amount. Rows include dates from 01/08/2024 to 01/31/2024 and descriptions of legal services such as 'Analyze pertinent aspects of Chubb ROR letter' and 'Review Ms. Damian's changes to proposed order'.

Summary table with 4 columns: Timekeeper, Hours, Rate, and Amount. Rows for Alhalel, Joshua R. (2.00 hours, \$595.00 rate, \$1,190.00 amount), Mazer, Jason Seth (3.00 hours, \$875.00 rate, \$2,625.00 amount), and Total fees for this matter (5.00 hours, \$3,815.00 amount).

DISBURSEMENTS

BILLING SUMMARY

TOTAL FEES	\$3,815.00
Balance Forward	\$287.50
TOTAL CHARGES FOR THIS BILL	<u>\$4,102.50</u>

PLEASE INCLUDE INVOICE NUMBER WITH YOUR PAYMENT

Exhibit 5

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

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

CASE NO. 2023-001716-CA-01

SECTION: CA-11

Plaintiffs,

v.

NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM
ASSOCIATION, INC.,

Defendant.

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

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

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

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

in the total amount of \$9,695.00 (after being reduced as set forth in the Application) for the period from November 1, 2023 through January 31, 2024;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver, incurred fees in the amount of \$67,621.00 and costs in the amount of \$4,471.91, for a total of \$72,092.91 (after being reduced as set forth in the Application) for the period from November 1, 2023 through January 31, 2024; and

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver, incurred fees in the amount of \$19,473.00 and costs in the amount of \$209.82, for a total of \$19,682.82 (after being reduced as set forth in the Application) for the period from November 1, 2023 through January 31, 2024.

(d) Cimo Mazer Mark PLLC, as Insurance Counsel to the Receiver, incurred fees in the amount of \$4,102.50 (after being reduced as set forth in the Application) for the period from December 21, 2023 through January 31, 2024.

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

DONE AND ORDERED in Miami, Florida, this ____ day of February, 2024.

CIRCUIT COURT JUDGE

Copies to all Counsel of Record