

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 FIFTH 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 fifth 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], Third Report [D.E. 40], and Fourth Report [D.E. 49] 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"), (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"),

and (iv) 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, 49], 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 May 8, 2024, attached 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], December 7, 2023 [D.E. 42], and February 26, 2024 [D.E. 50]. The Court also approved two loan certificates in the amount of four-hundred-thousand dollars (\$400,000) for payment to certain creditors and professionals 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 and payment of other receivership expenses on August 17, 2023 [D.E. 31].

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 Fourth Report [D.E. 49], 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 thirteen Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer questions. The most recent Zoom Meeting was held on April 30, 2024.

D. Retrieval of Belongings.

As set forth in the Receiver's prior reports [D.E. 23, 29, 40, 49], 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, 49], 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

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.

buildings based on cost and other variables to obtain the best quality and value for the owners on 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, and issued and approved the sub-permit for plumbing on or about February 1, 2024. The demolition commenced on March 20, 2024. The demolition is nearly complete.

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.

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

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

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49], 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 Fourth Report [D.E. 49], the Receiver, through Lead Counsel, monitors the Eliteway Class Action as needed.

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].

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).

ii. Thomas Class Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49], 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 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 was then 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, 49], 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, 49], 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, 49], 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 was held on February 22, 2024, and the Court entered an Order Placing Case on Inactive Status on February 23, 2024.

vi. Mechanic's Lien.

As referenced in the Receiver's Second, Third, and Fourth Reports [D.E. 29, 40, 49], 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 Myrthil) 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, 49], 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 Fourth Report [D.E. 49], the Court extended the time for the Receiver to effectuate service of process upon the more than 180 respondents in that case (most of which have already been served or signed a waiver of service) up to and including August 20, 2024.⁶ The Receiver, through Lead Counsel, has continued his efforts to serve the remaining respondents which have not yet been served.

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

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, Third, and Fourth Reports [D.E. 29, 40, 49], 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, and February 29, 2024. While the Receiver, through Lead Counsel, worked diligently to serve the remaining respondents prior to such dates, he was unable to do so, and thus, moved for another extension of time to effectuate service up to and including August 20, 2024.

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, Third, and Fourth Reports [D.E. 29, 40, 49], 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.

The Receiver moved for entry of clerk's default as to Elite Innovation Construction, Inc. on January 29, 2024 [D.E. 17] and the clerk entered default on January 30, 2024 [D.E. 19]. Ms. Barnes and Mr. Higgs stipulated to the entry of an order granting the Receiver's motion for default judgment and to entry of a final judgment clearing title to the property at issue and granting all other relief requested in the Receiver's motion [D.E. 37]. The Receiver then moved the court for entry of a default final judgment on April 24, 2024 [D.E. 34]. A hearing on the Receiver's motion for default final judgment was held on May 13, 2024, and the Court granted the Receiver's motion.

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, 49] and/or his foregoing Fifth 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”).⁷

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 February 1, 2024, through April 30, 2024,⁸ 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 January 29, 2024, through April 30, 2024, as well as the Receiver’s reductions thereto.

⁷ 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.

⁸ May 2024 invoices from GRSM, Lead Counsel, and Special Counsel will be submitted with the Receiver’s sixth report.

As reflected in **Composite Exhibit 2**, from February 1, 2024, to April 30, 2024, GRSM incurred fees in the total amount of \$10,615.00, and Lead Counsel incurred fees in the amount of \$27,776.00 and costs in the amount of \$6,563.34. As reflected in **Composite Exhibit 3**, from January 29, 2024, to April 30, 2024, Special Counsel incurred fees in the amount of \$3,807.00, and costs in the amount of \$102.10.

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 April 30, 2024, in the total amount of \$3,909.10. GRSM and Lead Counsel seek approval of their fees and costs from February 1, 2024, through April 30, 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 4**.

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,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Florida Court's e-Filing Portal upon all counsel of record on this 15th day of May, 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 5/8/2024

		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]	\$ 1,024,192.71	\$ 1,024,192.71	\$ 1,024,192.71
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 453.29	\$ 453.29	\$ 453.29
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available (Lines 1-8):			\$ 1,024,646.00
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 1,018,784.35	\$ 1,018,784.35	\$ 1,018,784.35
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 1,018,784.35
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)			\$ 1,018,784.35
Line 13	Ending Balance (As of May 8, 2024)			\$ 5,861.65
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 5,861.65

[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
1/29/2024	Maintenance Fee Deposit	\$ 3,976.46
2/1/2024	Maintenance Fee Deposit	\$ 711.11
2/6/2024	Maintenance Fee Deposit	\$ 1,435.21
2/12/2024	Maintenance Fee Deposit	\$ 1,744.49
2/21/2024	Maintenance Fee Deposit	\$ 626.68
2/28/2024	Maintenance Fee Deposit	\$ 895.81
3/1/2024	Maintenance Fee Deposit	\$ 666.90
3/6/2024	Maintenance Fee Deposit	\$ 1,748.21
3/11/2024	Maintenance Fee Deposit	\$ 1,337.79
3/21/2024	Maintenance Fee Deposit	\$ 859.40
3/28/2024	Maintenance Fee Deposit	\$ 269.00
4/2/2024	Maintenance Fee Deposit	\$ 1,832.98
4/4/2024	Maintenance Fee Deposit	\$ 313.34
4/9/2024	Maintenance Fee Deposit	\$ 1,024.45
4/12/2024	Maintenance Fee Deposit	\$ 313.34
4/19/2024	Maintenance Fee Deposit	\$ 269.13
4/25/2024	Maintenance Fee Deposit	\$ 269.13
4/30/2024	Maintenance Fee Deposit	\$ 859.27

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

Date of Check	From	Amount
5/2/2024	Maintenance Fee Deposit	\$ 1,435.21
5/7/2024	Maintenance Fee Deposit	\$ 397.77
Total		\$ 1,024,192.71

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
1/31/2024	interest	\$ 57.30
2/29/2024	interest	\$ 45.79
3/31/2024	interest	\$ 34.87
4/30/2024	interest	\$ 18.25
Total		\$ 453.29
GRAND TOTAL OF RECEIPTS		\$ 1,024,646.00

**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	1004
3/6/2023	John's Garage Door	\$ 299.60	1001
3/6/2023	Waste Connection	\$ 2,422.24	1002
3/7/2023	HSM Consulting, Inc.	\$ 1,800.00	1003
3/14/2023	Panissa Security	\$ 2,909.94	1005
3/14/2023	Appraisal First Real Estate Appraisers	\$ 3,000.00	1006
3/27/2023	Panissa Security	\$ 3,000.00	1007
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	1008
4/6/2023	Demolition Gods	\$ 6,500.00	wire
4/6/2023	wire fee	\$ 15.00	
4/6/2023	wire fee	\$ 15.00	
4/7/2023	Stonemark Inc.	\$ 12,598.42	ACH
4/7/2023	Stonemark Inc.	\$ 10.00	
4/7/2023	HSM Consulting	\$ 6,558.82	1009
4/7/2023	Morandi Engineering and Construction	\$ 2,995.00	1010
4/7/2023	Waste Connection	\$ 209.68	1011
4/7/2023	Waste Connection	\$ 576.77	1012
4/7/2023	Panissa Security	\$ 2,909.94	1013
4/7/2023	Panissa Security	\$ 7,909.94	1014
4/7/2023	Fence	\$ 4,800.00	1016
4/7/2023	Insurance	\$ 12,009.21	1017
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	ACH
4/17/2023	Stonemark Inc.	\$ 10.00	
4/18/2023	Panissa Security	\$ 3,954.72	1018
4/18/2023	Panissa Security	\$ 3,954.72	1019
4/19/2023	Demolition Gods	\$ 13,000.00	wire
4/19/2023	wire fee	\$ 15.00	
4/21/2023	Stonemark Inc.	\$ 11,984.21	ACH
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	1020

**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	ACH
5/1/2023	Stonemark Inc.	\$ 10.00	
5/1/2023	Telephone Service	\$ 20.00	
5/3/2023	Maverick Security Services LLC	\$ 1,810.44	1022
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	ACH
5/18/2023	Stonemark Inc.	\$ 10.00	
5/19/2023	Panissa Security	\$ 3,954.72	1023
5/19/2023	Maverick Security Services LLC	\$ 8,448.72	1024
5/24/2023	DVS Technologies	\$ 433.35	1025
5/24/2023	DVS Technologies	\$ 379.85	1025
5/24/2023	The Madison Insurance Group	\$ 716.00	ACH
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	wire
6/1/2023	Maverick Security Services LLC	\$ 8,448.72	1027
6/13/2023	Maverick Security Services LLC	\$ 8,448.72	1028
6/13/2023	Stonemark Inc.	\$ 11,984.21	ACH
6/13/2023	Stonemark Inc.	\$ 10.00	
6/2/2023	The Madison Group	\$ 4,180.05	ACH
6/21/2023	The Madison Group	\$ 2.95	
6/27/2023	Waste Connection	\$ 1,013.33	1029
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	1030
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	1031
7/14/2023	Action Junk Removal Services	\$ 450.00	1032
7/24/2023	Waste Connection	\$ 77.65	1033
7/25/2023	Vanguard Construction	\$ 10,000.00	1021
7/25/2023	Maverick Security Services LLC	\$ 8,448.72	1034
7/31/2023	Telephone Service	\$ 20.00	
8/1/2023	New Wave Loan	\$ 3,300.00	wire
8/8/2023	Maverick Security Services LLC	\$ 8,448.72	1035
8/22/2023	Maverick Security Services LLC	\$ 8,448.72	1036
8/31/2023	Telephone Service	\$ 20.00	
9/1/2023	New Wave Loan	\$ 3,300.00	wire
9/7/2023	Maverick Security Services LLC	\$ 8,448.72	1037
9/18/2023	New Wave Loan	\$ 10,000.00	wire

**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	wire
9/19/2023	wire fee	\$ 15.00	
9/19/2023	Sacher Zelman Harman PA	\$ 14,407.00	1038
9/19/2023	Maverick Security Services	\$ 8,448.72	1039
9/29/2023	Telephone Service	\$ 20.00	
10/1/2023	New Wave Loan	\$ 3,300.00	wire
10/6/2023	Maverick Security Sevices	\$ 8,448.72	1040
10/16/2023	Maverick Security Services	\$ 8,448.72	1041
10/18/2023	New Wave Loan	\$ 4,125.00	wire
10/30/2023	Maverick Security Services	\$ 8,448.72	1042
10/31/2023	Telephone Service	\$ 20.00	
11/1/2023	New Wave Loan	\$ 3,300.00	wire
11/14/2023	Maverick Security Services	\$ 8,448.72	1043
11/18/2023	New Wave Loan	\$ 4,125.00	wire
11/28/2023	Maverick Security Services	\$ 8,750.46	1044
11/30/2023	Telephone Service	\$ 20.00	
12/1/2023	New Wave Loan	\$ 3,300.00	wire
12/7/2023	Sacher Zelman Harman PA	\$ 7,198.35	1045
12/13/2023	Maverick Secuity Services	\$ 8,488.72	1046
12/18/2023	New Wave Loan	\$ 4,125.00	wire
12/27/2023	Maverick Security Services	\$ 8,750.46	1047
12/29/2023	HSM Consulting	\$ 825.00	1048
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	1049
1/10/2024	Maverick Security Services	\$ 9,353.94	1050
1/18/2024	New Wave Loan	\$ 4,125.00	
1/18/2024	City of Miami Gardens	\$ 10,092.50	1051
1/24/2024	Maverick Secuity Services	\$ 8,448.72	1053
1/30/2024	charge back	\$ 313.34	
1/30/2024	bank fee	\$ 12.00	
1/30/2024	Telephone Service	\$ 20.00	
2/1/2024	New Wave Loan	\$ 3,300.00	
2/5/2024	Jacqueline Greenberg CPA LLC	\$ 273.74	1052
2/6/2024	Maverick Security Services	\$ 8,448.72	1054
2/20/2024	New Wave Loan	\$ 4,125.00	
2/21/2024	City of Miami Gardens	\$ 264.10	1055
2/21/2024	Maverick Security Services	\$ 8,448.72	1056
2/26/2024	Sacher Zelman Harmon PA	\$ 19,682.82	1057
2/26/2024	Cimo Mazer Mark PLLC	\$ 4,102.50	1058

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

Date	From	Amount	
2/28/2024	Telephone Service	\$ 20.00	
3/1/2024	New Wave Loan	\$ 3,300.00	
3/6/2024	Maverick Security Services	\$ 8,448.72	1059
3/18/2024	Demolition Gods	\$ 93,750.00	
3/18/2024	Demolition Gods	\$ 15.00	
3/18/2024	New Wave Loan	\$ 4,125.00	
3/19/2024	Maverick Security Services	\$ 8,448.72	1062
3/20/2024	Alex Ochoa - lawn maintenance	\$ 400.00	1061
3/31/2024	Telephone Service	\$ 20.00	
4/1/2024	New Wave Loan	\$ 3,300.00	
4/2/2024	Madison Insurance	\$ 5,072.55	
4/2/2024	Madison Insurance	\$ 2.95	
4/3/2024	Maverick Security Services	\$ 8,448.72	1063
4/10/2024	Avante - Nea Insurance	\$ 5,086.19	
4/18/2024	New Wave Loan	\$ 4,125.00	
4/18/2024	Maverick Security Services	\$ 8,448.72	1064
4/25/2024	Demolition Gods	\$ 93,750.00	
4/25/2024	Demolition Gods	\$ 15.00	
4/30/2024	Tmobile	\$ 20.00	
5/1/2024	New Wave Loan	\$ 3,300.00	
5/2/2024	Maverick Security Services	\$ 6,839.44	1065
GRAND TOTAL OF EXPENSES		\$ 1,018,784.35	

COMPOSITE EXHIBIT 2

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

March 22, 2024
ID: GERSP 1299620
Invoice No. 21538132
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 29, 2024

Fees For Professional Services:	\$1,575.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,575.00

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>
02/05/24	Review, respond and forward CPA Greenberg email re: bill re: tax filing .1	DMG2	0.10
02/07/24	Review multiple court filings by Peter Valori .2	DMG2	0.20
02/08/24	Review and respond to Peter Valori email re: conference .1	DMG2	0.10
02/09/24	Review and respond to CPA email re: extension re: filing .1	DMG2	0.10
02/10/24	Review and respond to Peter Valori email re: case .1	DMG2	0.10
02/12/24	Review and respond to Rick Zelman email with attached billing .1	DMG2	0.10
02/14/24	Review and edit receiver's report sent bu Morgan Levine .5	DMG2	0.50
02/23/24	Review order from court .1	DMG2	0.10
02/26/24	Review and respond to Reesea Setae email with order attached .1; review and respond to Mary Dhanji re: court order .1	DMG2	0.20
02/27/24	Review multiple emails with court documents .2	DMG2	0.20
02/28/24	Review multiple emails with filings in case .2	DMG2	0.20
02/29/24	Review multiple documents filed with the court .2	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	2.10	1,575.00

TOTAL FOR SERVICES

\$1,575.00

Outstanding Statements as of March 22, 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
Statement No 21503476	February 7, 2024	\$2,715.00
Total Accounts Receivable Balance:		\$68,454.97

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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

March 22, 2024
ID: GERSP 1299620
Invoice No. 21538132
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 29, 2024

Fees For Professional Services:	\$1,575.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,575.00

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: 21538132

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

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GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(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

April 10, 2024
ID: GERSP 1299620
Invoice No. 21550055
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2024

Fees For Professional Services:	\$4,575.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,575.00

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
03/01/24	Review multiple court filings .2; medial to Mary Dhanji re: tax return .1	DMG2	0.30
03/02/24	Review and respond to CPA email re: tax return .1	DMG2	0.10
03/04/24	Review court filing .1	DMG2	0.10
03/05/24	Review document filed in court action .1; review document(s) filed in case .1	DMG2	0.20
03/06/24	Review court filing .1	DMG2	0.10
03/07/24	Review court filing .1; review answer/affirmative defenses filed .2; review an respond to CPA email re: filing .1	DMG2	0.40
03/08/24	Review and respond to Mary Dhanjhi email re: filing .1	DMG2	0.10
03/13/24	Review and respond to email from Peter Valori re: court filing .1	DMG2	0.10
03/14/24	Review court filing .1; review and respond to Reesea Seatae email re: zoom .1; review court filing .1	DMG2	0.30
03/15/24	Review new court filing .1; review new court filing .1; review newly filed motion to dismiss .1; review newly filed answer and affirmative defenses .2	DMG2	0.50
03/18/24	Review motion filed in case .1; review motion filed in case .1; review filing in case .1; review motion filed in case .1	DMG2	0.40
03/19/24	Review new court case filing .1; review and respond to Mary Dhanji email re: insurance coverage .1; review court case filing .1	DMG2	0.30
03/20/24	Review and respond to Reesa Setae email re: objection .1; review order filed in case .1; review and respond to Jacqueline Greenberg CPA email re: tax filing .1; review answer filed in case .2; review complaint filed against the association .3	DMG2	0.80
03/21/24	Review new filing on court case .1	DMG2	0.10
03/25/24	Review new amended complaint .5; review document filed in court case .1; review Peter Valori email re: case .1	DMG2	0.70
03/26/24	Review answer/affirmative defenses filed in case .3; review additional	DMG2	0.70

answer/defenses filed in case .2; review and respond to Adriana Pavon email re: insurance .1; review another answer filed in case .1

03/28/24	Review answer and affirmative defenses in case .1; review multiple answer(s) and affirmative defense(s) in case .3; review court filing in case .1; review order from court .1; review and respond to Peter Valori email with response form opposing counsel .1; review and respond to CPA email re: tax filing .1	DMG2	0.80
03/29/24	Review court filing .1	DMG2	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	6.10	4,575.00

TOTAL FOR SERVICES **\$4,575.00**

Outstanding Statements as of April 10, 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
Statement No 21503476	February 7, 2024	\$2,715.00
Statement No 21538132	March 22, 2024	\$1,575.00

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 21550055

April 10, 2024
Page 4

Invoice Number

Date

Balance Due

Total Accounts Receivable Balance:

\$70,029.97

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GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(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

April 10, 2024
ID: GERSP 1299620
Invoice No. 21550055
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2024

Fees For Professional Services:	\$4,575.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,575.00

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: 21550055

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

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GORDON REES SCULLY MANSUKHANI

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100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(510) 463-8600

Tax ID: 94-1617026

April 1, 2024

To our valued Clients,

Please note our new address on our invoices:

**100 Pringle Avenue, Suite 300
Walnut Creek CA 94596-3580**

We strongly encourage all clients to remit funds via ACH or wire.

OPERATING ACCOUNT BANKING 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 (Wires):	121000248
ABA Number (ACH):	121042882
International (Swift Code):	WFBIUS6S

Note: Please reference: Invoice Number and the Client/Matter

Remittance Notification: CashReceipts@grsm.com

CHECKS

Effective immediately, checks should be sent to our lockbox and not to the physical office.

**Lockbox Services Box # 399258
3440 Flair Drive
El Monte, CA 91731-2823**

CREDIT CARD PAYMENTS

Please reach out to cashreceipts@grsm.com for credit card instructions and myself at snahal@grsm.com for further questions and assistance.

Sincerely,



Satnam S Nahal

Chief Financial Officer

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Tax ID: 94-1617026

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

May 14, 2024
ID: GERSP 1299620
Invoice No. 21575686
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2024

Fees For Professional Services:	\$4,465.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,465.00

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
04/01/24	Update of case status from Peter Valori .1; review answer and affirmative defenses filed in case .1; review and respond to Rick Zelman email with billing attached .1; review and respond to Adam Ruff email re: insurance .1	DMG2	0.40
04/02/24	Review and respond to Adriana Pavon email re: insurance .1; review new filing in court case .1	DMG2	0.20
04/03/24	Review and respond to Adam Ruff email re: insurance .1	DMG2	0.10
04/19/24	Review filed court documents .2; Review and respond to Peter Valori email re: update report .1	DMG2	0.30
04/22/24	Review court filing .1; review and respond to email from Reesae Setae re: document .1; review and respond to Peter Valori email with attached motion for review and editing .2	DMG2	0.40
04/23/24	Review court filing .1; review and respond to Peter Valori email re: motion to be filed .1; review answer filed in case .2	DMG2	0.40
04/24/24	Review document filed in case .1; review and respond to Mary Dhanji email re: demolition .1; review and respond to Peter Valori email with attachments and analysis for review and instructions .3; review and respond to Peter Valori email re: demolition .1	DMG2	0.60
04/25/24	Review and respond to Peter Valori email re: timeline re: demolition .1; review and respond to Peter Valori email with (7) attachments for review re: case .5; review and respond to Peter Valori/Eric Thompson emails re: insurance .1; review motion filed in court case .2; review and respond to Peter Valori email re: filing .1; review and respond to Melanie Damian email re: oppose motion .1	DMG2	1.10
04/25/24	Analyze 4/24/24 email correspondence from Yolanda Strader, Esq. to Peter Valori, Esq. regarding claim for insurance proceeds against management company (Prestige Management) in furtherance of evaluating said claim (as requested by Mr. Valori)	ERT	0.10
04/25/24	Analyze the following materials in furtherance of evaluating claim by Association owners and renters for insurance proceeds against management company (Prestige Management) in furtherance of evaluating said claim (as requested by Peter Valori, Esq.): 1) 2/5/24 correspondence from Yolanda Strader, Esq. to Joseph Downs, Esq., 3	ERT	0.40

pages; 2) 8/21/23 correspondence to Prestige Management from Hiscox, 5 pages; and 3) 7/5/23 correspondence to Prestige Management from Hiscox, 2 pages

04/25/24	Analyze the following case law cited in 2/5/24 correspondence from Yolanda Strader, Esq. to Joseph Downs, Esq., in furtherance of evaluating claim by Association owners and renters for insurance proceeds against management company (Prestige Management) in furtherance of evaluating said claim (as requested by Peter Valori, Esq.): Allstate Ins. Co. v. West American Ins. Co. (D. Colo. 2011), 5 pages; 2) Atain Specialty Ins. Co. v. Sierra Pacific Management Co. (9th Cir. 2018), 3 pages; 3) Rockhill Ins. Co. v. Northfield Ins. Co. (MD Fla. 2017), 10 pages; and 4) Cincinnati Ins. Co. v. Nat'l Union Fire Ins. Co. of Pittsburgh, PA (S.D. Ohio 2019), 10 pages	ERT	0.80
04/25/24	Email correspondence with Peter Valori, Esq. regarding claim by Association owners and renters for insurance proceeds against management company (Prestige Management) in furtherance of evaluating said claim (as requested by Mr. Valori)	ERT	0.20
04/26/24	Conference with Eric Thompson re: insurance analysis .1; review and respond to Peer Valori email re: security guard service .1	DMG2	0.20
04/26/24	Telephone conference with D. Gersten regarding insurance issues	ERT	0.10
04/29/24	Conference with Melanie Damian re: outstanding issues and court case .2; review and respond to Peter Valori email re: demolition .1; review and respond to Rick Zelman email re: purchase inquiry .1	DMG2	0.40
04/30/24	Review and respond to Melanie Damian email re: probate issue in case .1; review new filing in court case .1; attend zoom meeting with the homeowners .8	DMG2	1.00

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	5.10	3,825.00
ERT	Eric Thompson	Partner	400.00	1.60	640.00

TOTAL FOR SERVICES

\$4,465.00

Outstanding Statements as of May 14, 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
Statement No 21503476	February 7, 2024	\$2,715.00
Statement No 21538132	March 22, 2024	\$1,575.00
Statement No 21550055	April 10, 2024	\$4,575.00
Total Accounts Receivable Balance:		\$74,604.97

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Tax ID: 94-1617026

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

May 14, 2024
ID: GERSP 1299620
Invoice No. 21575686
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2024

Fees For Professional Services:	\$4,465.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,465.00

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100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(510) 463-8600

Tax ID: 94-1617026

April 1, 2024

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El Monte, CA 91731-2823**

CREDIT CARD PAYMENTS

Please reach out to cashreceipts@grsm.com for credit card instructions and myself at snahal@grsm.com for further questions and assistance.

Sincerely,



Satnam S Nahal

Chief Financial Officer



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

INVOICE

Invoice # 603
 Date: 04/30/2024

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

Professional Fees

Date	Description	Staff	Hours	Rate	Amount
02/01/2024	Email and call with insurance counsel regarding class claim and resolution of motion for relief from stay and claims.	MME	0.40	\$550.00	\$220.00
02/01/2024	Work on summonses to be issued to new group of respondents in partition action.	MJL	0.20	\$350.00	\$70.00
02/02/2024	Work on renewing insurance policy for the Receiver and counsel.	JS	0.90	\$295.00	\$265.50
02/02/2024	Emails regarding proposed order motion for relief from stay provision.	MME	0.50	\$550.00	\$275.00
02/02/2024	Continue working on summonses to new defendants added to the amended complaint to submit to the clerk for issuance in the partition action.	rs	2.30	\$100.00	\$230.00
02/02/2024	Email with counsel for Deutsche Bank regarding agreed order to stay of litigation (0.1); email communications with same regarding requested hearing on motion to stay litigation (0.2); work on application to renew professional liability insurance (0.4); work on summonses to be issued to new group of respondents in partition action (1.8).	MJL	2.50	\$350.00	\$875.00
02/05/2024	Meeting with P. Valori regarding status and agreed order.	MME	0.40	\$550.00	\$220.00

02/05/2024	Telephone conference with J. Hekkanen regarding amended complaint and answer in the partition action (.1); email and telephone conference with office of opposing counsel regarding motion to dismiss or stay litigation in Deutsche v. King case (.2).	rs	0.30	\$100.00	\$30.00
02/05/2024	Analyze orders granting loan certificates and fee applications in preparation of hearing on motion to stay (0.2); appear at hearing regarding same (0.7).	MJL	0.90	\$350.00	\$315.00
02/05/2024	Prepare for hearing on motions to stay.	PFV	0.30	\$550.00	\$165.00
02/05/2024	Review order on stay lift as to Thomas case.	PFV	0.10	\$550.00	\$55.00
02/05/2024	Draft status report to Receiver.	PFV	0.10	\$550.00	\$55.00
02/06/2024	Email communications with Receiver regarding his law firm's invoices from November 2023 to January 2024 in preparation of working on Receiver's fourth report and fee application (0.1); analyze standard fund accounting report through January 18, 2024 in preparation of same (0.1); work on Receiver's fourth report with focus on citations to prior reports (0.1); same with focus on engagement of professionals (0.2); same with focus on finances and assets (0.2); same with focus on meetings with unit owners (0.1); same with focus on retrieval of personal belongings (0.1); same with focus on demolition (0.2); same with focus on stipulated order as to stay in Thomas class action (0.2).	MJL	1.30	\$350.00	\$455.00
02/06/2024	Continue working on submitting summonses to new defendants added to the amended complaint for issuance by the clerk (2.5); several telephone conferences with clerk regarding same (.5).	rs	3.00	\$100.00	\$300.00
02/06/2024	Review update regarding issuance and processing of additional summons.	PFV	0.20	\$550.00	\$110.00
02/07/2024	Analyze email communications with process server to determine which respondents named in the initial complaint have not yet been served in preparation of moving for extension of time to effectuate service upon same (0.2); work on motion for extension of time to serve process upon original respondents which have not yet been served in the partition action (0.6); telephone call with J. Andrews regarding opening estate of C. Andrews and other matters concerning the partition action (0.2); telephone call with L. Landy regarding process for opening estates of C. Andrews and J. St. Germain (0.4); email communications with Receiver regarding foregoing matters (0.6); analyze standard fund accounting report in preparation of working on Receiver's fourth report (0.2); analyze communications with demolition company in preparation of same (0.2); work on Receiver's fourth report with focus on the assets and finances of the Association and Receivership Estate (0.1); same with	MJL	5.80	\$350.00	\$2,030.00

	<p>focus on the demolition and permitting as to same (0.3); same with focus on the Eliteway class action (0.1); same with focus on the Thomas class action (0.3); same with focus on the Valtom action (0.1); same with focus on the Forty Year Investment action (0.1); same with focus on the Deutsche Bank action (0.2); same with focus on the mechanic's lien (0.2); same with focus on the partition action (0.4); same with focus on the lawsuit against Prestige (0.3); same with focus on the lawsuit against the roofers (0.4); same with focus on the Receiver's plan moving forward (0.1); same with focus on the conclusion section (0.1); analyze Lead Counsel's November and December 2023 invoice in preparation of working on the Receiver's application for order authorizing payment of fees and expenses and for authorization to distribute funds pursuant to the order appointing receiver (0.2); analyze GRSM's invoices from November 2023 to January 2024 in preparation of same (0.2); work on foregoing application with focus on the professionals engage by the Receiver (0.3).</p>				
02/07/2024	Telephone conference with clerk regarding summonses on new defendants (.3); revise certain summonses in compliance with clerk's request in partition action (1.0); draft notice of hearing on motion to dismiss or stay litigation in Deutsche v. King case (.2).	rs	1.50	\$100.00	\$150.00
02/07/2024	Review file and conference regarding status and planning as to service of process and issues concerning estate issues in partition case.	PFV	0.50	\$550.00	\$275.00
02/07/2024	Review file and conference regarding default judgment in New World v. Elite Innovation matter.	PFV	0.20	\$550.00	\$110.00
02/07/2024	Revise motion for extension to serve process in Partition case on remaining four of the one hundred and fifteen original defendants.	PFV	0.20	\$550.00	\$110.00
02/07/2024	Email regarding cost and process to open estates for deceased unit owners as to partition case.	PFV	0.20	\$550.00	\$110.00
02/08/2024	Analyze updated title search to determine whether lienholder not referenced in style of case of amended complaint for partition is referenced therein (0.1); analyze Accurint reports for owners of Unit 237 to determine contact information for same (0.2); email communications with J. Kullman regarding his representation of one of the two owners of Unit 237 and whether he is representing both owners in the partition action (0.1).	MJL	0.40	\$350.00	\$140.00
02/09/2024	Conference with R. Saetae regarding service of process and waivers of same upon new group of respondents in partition action, including working on list of respondents to request waivers from and list of respondents to effectuate service upon.	MJL	0.90	\$350.00	\$315.00

02/09/2024	Create spreadsheet with all relevant information on new defendants added to amended complaint in partition action.	rs	2.00	\$100.00	\$200.00
02/09/2024	Email regarding unit owner Henderson access to property.	PFV	0.30	\$550.00	\$165.00
02/09/2024	Email regarding conference with insurance counsel.	PFV	0.30	\$550.00	\$165.00
02/09/2024	Email with demolition company.	PFV	0.30	\$550.00	\$165.00
02/12/2024	Email to owners regarding upcoming owners' meeting with Receiver.	rs	0.50	\$100.00	\$50.00
02/12/2024	Review invoice from real estate counsel regarding fee application and draft email regarding same.	PFV	0.10	\$550.00	\$55.00
02/13/2024	Email communications with K. Shaw regarding invoices from insurance counsel (0.2); email communications with R. Zelman regarding invoices of special counsel (0.1); email communications with A. Ruff regarding invoices of Receiver's law firm (0.1); work on Receiver's fourth report with focus on clerk's defaults against roofers (0.3); same with focus on Thomas class action (0.2); same with focus on payment to B. Friedman (0.2).	MJL	1.10	\$350.00	\$385.00
02/13/2024	Work on quarterly report and review of supporting documentation.	PFV	1.80	\$550.00	\$990.00
02/14/2024	Analyze Accurant report of E. Phillips to determine date of birth and/or social security number as needed to determine military status via Service Members Relief Act website in preparation of obtaining clerk's default (0.2); work on non-military service affidavit of E. Phillips in preparation of same (0.3); work on Receiver's fourth report with focus on status of demolition, including analysis of email communications with demolition company (0.3); work on Receiver's fourth fee application with focus on invoices to be attached thereto (0.2); same with focus on calculating total amount of fees and costs sought (0.2); work on proposed order granting Receiver's fourth fee application (0.2); email communications with A. Ruff regarding invoices (0.1); email communications with R. Zelman regarding same (0.1); email communications with M. Dhanji regarding Lead Counsel's combined invoices from November 2023 to January 2024 to be attached to the Receiver's fourth report and fee application (0.1); email communications with Receiver regarding Receiver's fourth report and fee application (0.1).	MJL	1.80	\$350.00	\$630.00
02/14/2024	(No charge) Draft notice of hearing on amended motion for clerk's default in Deutsche v. King case (.2); draft rennotice of hearing on motion for extension of time to effectuate service of process (.2); emails to and from D.	rs	0.50	\$0.00	\$0.00

Morales regarding same in partition action (.1).					
02/14/2024	Email regarding status and tax returns.	PFV	0.30	\$550.00	\$165.00
02/15/2024	Receipt and review of issued summonses for new defendants added to amended complaint and update spreadsheet accordingly in partition action.	rs	1.50	\$100.00	\$150.00
02/18/2024	Review case management order in Elite Innovations case.	PFV	0.30	\$550.00	\$165.00
02/19/2024	Work on E. Phillips non-military affidavit (.8); conference with P. Valori regarding document production (.2).	JS	1.00	\$295.00	\$295.00
02/19/2024	Conference with P. Valori and S. Goldberg regarding actions within the receivership, production of documents, and factual background.	JS	1.10	\$295.00	\$324.50
02/19/2024	Work on additional summonses for new defendants named in amended complaint (1.0); conference with P. Valori regarding strategy moving forward with service of summonses in partition action (.3); review court file regarding motions for clerk's default in case against roofers (.3).	rs	1.60	\$100.00	\$160.00
02/19/2024	Confer with insurance defense counsel regarding Thomas case.	PFV	1.10	\$550.00	\$605.00
02/19/2024	Review update regarding shooting near property.	PFV	0.10	\$550.00	\$55.00
02/20/2024	Continue working on non-military affidavit for E. Phillips.	JS	0.10	\$295.00	\$29.50
02/20/2024	Draft motion for default final judgment regarding Elite Innovation and E. Phillips.	JS	1.50	\$295.00	\$442.50
02/21/2024	Continue drafting motion for default final judgment regarding Elite Innovation and E. Phillips.	JS	0.80	\$295.00	\$236.00
02/21/2024	Continue working on motion for default final judgment.	JS	0.20	\$295.00	\$59.00
02/21/2024	Gather documents to produce to S. Goldberg.	JS	0.40	\$295.00	\$118.00
02/21/2024	Conferences and email regarding service of process update regarding partition action.	PFV	0.20	\$550.00	\$110.00
02/22/2024	Draft motion for clerk's entry of default against E. Phillips.	JS	0.50	\$295.00	\$147.50
02/22/2024	Continue drafting motion for clerk's entry of default against E. Phillips.	JS	0.20	\$295.00	\$59.00
02/22/2024	Continue working on motion for clerk's entry of default against E. Phillips.	JS	0.30	\$295.00	\$88.50
02/22/2024	Draft notice of filing non-military affidavit for Elrod Phillips, Jr. in case against roofers.	rs	0.20	\$100.00	\$20.00

02/22/2024	Prepare for and attend hearing on motion to extend time to serve.	PFV	0.40	\$550.00	\$220.00
02/22/2024	Prepare for and attend hearing on motion to stay Shorn King case.	PFV	0.30	\$550.00	\$165.00
02/23/2024	(No charge) Draft proposed orders on receiver's motion for stay and plaintiff's motion to place case on inactive status; email to opposing counsel regarding same in Deutsche v. King case.	rs	0.50	\$0.00	\$0.00
02/27/2024	Review Ageis and Rubin returns of service regarding partition action.	PFV	0.20	\$550.00	\$110.00
02/28/2024	Continue working on motion for entry of clerk's default against E. Phillips.	JS	0.10	\$295.00	\$29.50
03/01/2024	Revise motion for clerk's default against Elrod Phillips, Jr. (.1); telephone conference with clerk regarding default in case against Elite Innovative Construction (.2); receipt and review of affidavits of service on summonses issued to new defendants in amended complaint in partition action (.2).	rs	0.50	\$100.00	\$50.00
03/04/2024	Review, analyze and update spreadsheet on new defendants added in the amended complaint (.2); emails to and from process server regarding status in the partition action (.1).	rs	0.30	\$100.00	\$30.00
03/05/2024	Email regarding unit 129 request for fire documentation.	PFV	0.10	\$550.00	\$55.00
03/05/2024	Receipt and review of letter from CT Corp. regarding defendant, Publix Employees Federal Credit Union (.2); review summons issued to defendant, Publix Employees Federal Credit Union (.1); review sunbiz records regarding same (.1); emails to and from process server regarding defendant Claude Cooper (.2); update spreadsheet on new defendants added in the amended complaint (.2); review court file regarding Deutsche Bank in partition action (.2).	rs	1.00	\$100.00	\$100.00
03/07/2024	Receipt and review of waiver from counsel for defendant for Joan Beverly Leguerre (.1); email to counsel regarding amended complaint (.2); update spreadsheet on new defendants added in the amended complaint in partition action (.2).	rs	0.50	\$100.00	\$50.00
03/09/2024	Email regarding requested dismissal of satisfied mortgage holder.	PFV	0.10	\$550.00	\$55.00
03/10/2024	Review invoice from real estate lawyer.	PFV	0.20	\$550.00	\$110.00
03/11/2024	Emails to and from process server regarding summonses (.2); update spreadsheet on new defendants added in the amended complaint in partition action (.2).	rs	0.40	\$100.00	\$40.00
03/13/2024	Draft amended summons to defendant Publix	rs	1.50	\$100.00	\$150.00

	Employees Federal Credit Unit (.2); emails to and from process server regarding same (.1); email to counsel for Deutsche Bank (.1); emails to and from receiver regarding next zoom owners' meeting (.1); review additional addresses for defendant Flora M. Ramirez and advise process server (.2); update spreadsheet in partition action (.2); draft memo regarding waiver and notice to new defendants named in amended complaint (.6).				
03/14/2024	Emails with insurance agent regarding application for renewing insurance policy to cover Receiver and his firm, review application, and send email to team regarding information to gather and fill in application.	KDM	0.20	\$525.00	\$105.00
03/15/2024	Further emails with insurance agent regarding status of completing Application to renew insurance policy for Receiver and counsel and provide direction to A. Pavon regarding filling out Application, confirming certain financial information, and obtaining updated budget to submit with Application, gather and provide prior Application and other materials to A. Pavon, and exchange emails with A. Pavon regarding same.	KDM	0.20	\$525.00	\$105.00
03/18/2024	Gather and analyze documents to send to S. Goldberg regarding defense of renter lawsuit.	JS	0.30	\$295.00	\$88.50
03/18/2024	Conference with paralegal regarding update on service of process.	PFV	0.10	\$550.00	\$55.00
03/18/2024	Review correspondence regarding insurance modifications and cost.	PFV	0.10	\$550.00	\$55.00
03/18/2024	Review information received from process server regarding defendant Gus Ramirez in partition action.	rs	0.20	\$100.00	\$20.00
03/18/2024	Emails to and from R. Zellman regarding defendant Ygrene.	rs	0.20	\$100.00	\$20.00
03/20/2024	Review answer of City of Miami Beach in partition action.	PFV	0.10	\$550.00	\$55.00
03/20/2024	Email regarding US bank mortgage and claimed satisfaction.	PFV	0.20	\$550.00	\$110.00
03/20/2024	Email regarding late unit owner request for access.	PFV	0.20	\$550.00	\$110.00
03/20/2024	Review email regarding motion to substitute regarding green energy entities.	PFV	0.20	\$550.00	\$110.00
03/20/2024	Review information received regarding defendant Joye Antoinette Green Lawson (.1); update spreadsheet (.2); emails to and from various attorneys regarding extensions to answer amended complaint (.2); email to R. Zellman regarding defendant NewRez in partition action (.2).	rs	0.70	\$100.00	\$70.00
03/22/2024	Conference with counsel for the clerk regarding	PFV	0.30	\$550.00	\$165.00

	partition action.				
03/24/2024	Review correspondence regarding extension requests and proposed order regarding partition case.	PFV	0.30	\$550.00	\$165.00
03/24/2024	Email with counsel for the Receiver regarding status and planning.	PFV	0.10	\$550.00	\$55.00
03/25/2024	Review email regarding unit 202.	PFV	0.20	\$550.00	\$110.00
03/25/2024	Conference with real estate counsel regarding title complications and proposed solutions.	PFV	0.40	\$550.00	\$220.00
03/25/2024	Draft additional summons to defendant added to amended complaint (previously left out) (.2); receipt and review of affidavits from process server (.2); updated spreadsheet in partition action (.3).	rs	0.70	\$100.00	\$70.00
03/26/2024	Telephone calls and email exchanges with S. Tamborello regarding insurance application (.4); email exchange with A. Ruff to provide insurance application for signature (.1); receipt and review of insurance application and preparation of documents needed for same (.3).	AP	0.80	\$295.00	\$236.00
03/26/2024	Review city of Miami Gardens's answer to Partition complaint.	PFV	0.20	\$550.00	\$110.00
03/26/2024	Review New Rez answer to complaint.	PFV	0.10	\$550.00	\$55.00
03/26/2024	Review Safe Financial proof of service.	PFV	0.10	\$550.00	\$55.00
03/26/2024	Review Nationstar's answer to complaint.	PFV	0.10	\$550.00	\$55.00
03/28/2024	Email with Carlos Prieto regarding response to request for extension.	PFV	0.10	\$550.00	\$55.00
03/28/2024	Review proposed order regarding same.	PFV	0.10	\$550.00	\$55.00
03/28/2024	Email regarding potential purchaser inquiry.	PFV	0.20	\$550.00	\$110.00
03/28/2024	Review service of process updated spreadsheet.	PFV	0.30	\$550.00	\$165.00
03/28/2024	Email with counsel for mortgage holder regarding request for dismissal based on satisfaction.	PFV	0.20	\$550.00	\$110.00
03/28/2024	Email with real estate counsel regarding same.	PFV	0.20	\$550.00	\$110.00
03/28/2024	Email regarding claims asserted against the clerk of court.	PFV	0.20	\$550.00	\$110.00
03/29/2024	Email to unit owners regarding next zoom owners' meeting (.2); email to D. Bissel regarding new post on website (.1); Email to counsel for Deutsche Bank (.1); review and analyze spreadsheet regarding service of process (.2); prepare memo and supporting documents regarding problematic units in partition action (1.0).	rs	1.60	\$100.00	\$160.00

04/01/2024	Discuss with A. Pavon upcoming deadline to submit completed application for renewal of insurance policy to cover Receiver and counsel and emails with Receiver's office regarding same and remaining information from Receiver to add to application.	KDM	0.20	\$525.00	\$105.00
04/01/2024	Update spreadsheet regarding service of process in partition action.	rs	0.30	\$100.00	\$30.00
04/02/2024	Email exchange with A. Ruff regarding New World insurance application.	AP	0.10	\$295.00	\$29.50
04/02/2024	Continue working on obtaining non-military affidavit for Elrod A. Phillips, Jr.	JS	0.10	\$295.00	\$29.50
04/02/2024	Review return of service upon Primary Residential Mortgage.	PFV	0.10	\$550.00	\$55.00
04/02/2024	Email regarding Ruiz law firm charging lien.	PFV	0.20	\$550.00	\$110.00
04/02/2024	Email with client regarding response to discovery.	PFV	0.20	\$550.00	\$110.00
04/02/2024	Review, analyze and update spreadsheet regarding service of process on new defendants added in the amended complaint (.2); emails to R. Zellman regarding various defendants (.2); emails to and from process server regarding status in the partition action (.1).	rs	0.50	\$100.00	\$50.00
04/03/2024	Correspondence with Servicemembers Civil Relief Act Centralized Verification Service regarding Elrod A. Phillips, Jr.'s non-military affidavit.	JS	0.10	\$295.00	\$29.50
04/03/2024	Call with A. Ruff regarding insurance application (.2); email exchanges and telephone calls with S. Tamborello regarding terms of application (.3).	AP	0.50	\$295.00	\$147.50
04/04/2024	Continue working on motion for default final judgment against Elrod A. Phillips, Jr. and Elite Innovation Construction, Inc. (1.2); correspondence with Servicemembers Civil Relief Act Centralized Verification Service regarding nonmilitary affidavit for Elrod A. Phillips, Jr. (.1).	JS	1.30	\$295.00	\$383.50
04/04/2024	Email exchange with S. Tamborello regarding outstanding documents for insurance renewal.	AP	0.10	\$295.00	\$29.50
04/04/2024	Email from insurance agent forwarding proposal for renewal policy for Receiver and law firm for Receiver to review and sign, review proposal, emails with Receiver regarding his execution of proposal, receive confirmation of same and review same, and emails with insurance agent confirming execution of proposal and sending invoice for policy premium, review invoice, discuss with A. Pavon, coordinate payment, and emails with M. Dhanji regarding same.	KDM	0.30	\$525.00	\$157.50
04/04/2024	Email regarding Ruiz firm lien and discharge/dismissal offer.	PFV	0.20	\$550.00	\$110.00

04/04/2024	Emails to and from counsel for defendant, John H. Ruiz (.2); emails to and from R. Zellman regarding same in partition action (.4).	rs	0.60	\$100.00	\$60.00
04/08/2024	Emails with insurance agent regarding status of Receiver's execution of insurance documents for renewal of policy to cover receiver and law firm, review signed documents, forward to insurance agent, and emails with M. Dhanji and A. Pavon regarding payment of premium for same.	KDM	0.20	\$525.00	\$105.00
04/08/2024	Email regarding Ruiz lien and voluntary dismissal.	PFV	0.20	\$550.00	\$110.00
04/08/2024	Email regarding updated non-military report and request for Clerk's default.	PFV	0.20	\$550.00	\$110.00
04/08/2024	Emails to and from R. Zellman regarding various defendants (.4); review, analyze and update spreadsheet on new defendants added in the amended complaint in partition action (.2).	rs	0.60	\$100.00	\$60.00
04/09/2024	Email to R. Zellman regarding title matters as to unit 238.	rs	0.20	\$100.00	\$20.00
04/12/2024	Continue working on the motion for clerk's entry of default against E. Phillips.	JS	0.70	\$295.00	\$206.50
04/12/2024	Email regarding updated affidavit of non-military service.	PFV	0.20	\$550.00	\$110.00
04/12/2024	Review case management order (.3); draft notice of filing affidavit of non-military affidavit in case against roofer (.2).	rs	0.50	\$100.00	\$50.00
04/15/2024	Review file regarding remaining parties for service of process and potential dismissals.	PFV	0.30	\$550.00	\$165.00
04/15/2024	Emails to and from R. Zellman regarding dismissal of various defendants (.2); Review, analyze and update spreadsheet on new defendants added in the amended complaint in partition action (.2).	rs	0.40	\$100.00	\$40.00
04/16/2024	Review, analyze and update spreadsheet on new defendants added in the amended complaint (.2); emails to and from process server regarding status in the partition action (.1).	rs	0.30	\$100.00	\$30.00
04/17/2024	Work on motion for final default judgment.	JS	0.70	\$295.00	\$206.50
04/17/2024	Review and analyze notice of default not entered (as to AKA) (.2); telephone conference with clerk regarding same in case against roofers (.3); emails to and from opposing counsel regarding hearing on motion to transfer (.3).	rs	0.80	\$100.00	\$80.00
04/19/2024	Review motion for entry of final judgement as to all claims.	PFV	0.40	\$550.00	\$220.00

04/19/2024	Emails to and from R. Zellman regarding various defendants as to title issues (.3); review, analyze and update spreadsheet on new defendants added in the amended complaint (.5); draft notices of dismissal as to various defendants (.3).	rs	1.10	\$100.00	\$110.00
04/20/2024	Review dismissal regarding Ruiz law firm.	PFV	0.10	\$550.00	\$55.00
04/21/2024	Review email regarding title matters as to partition case regarding unit 129.	PFV	0.10	\$550.00	\$55.00
04/21/2024	Email with Bradley Friedman regarding payment of outstanding invoice.	PFV	0.20	\$550.00	\$110.00
04/22/2024	Continue working on motion for default final judgment regarding V. Higgs and Y. Barnes.	JS	1.50	\$295.00	\$442.50
04/22/2024	Work on motion for extension of time to effectuate service in New World v. Higgs, et al.	JS	0.30	\$295.00	\$88.50
04/22/2024	Review revise motion for extension of time to serve remaining respondents based on death of certain respondents and inability to locate certain respondents despite diligent effort.	PFV	0.30	\$550.00	\$165.00
04/22/2024	Email with counsel for US Bank as agent for Chalet Series regarding disclaimer and request for dismissal.	PFV	0.10	\$550.00	\$55.00
04/22/2024	Draft email regarding inquiry with title attorney regarding same.	PFV	0.10	\$550.00	\$55.00
04/23/2024	Review notice of hearing a motion to extend time to serve remaining respondents in partition case.	PFV	0.10	\$550.00	\$55.00
04/23/2024	Review Miami-Dade county answer to complaint.	PFV	0.10	\$550.00	\$55.00
04/23/2024	Draft email to title lawyer regarding same.	PFV	0.10	\$550.00	\$55.00
04/23/2024	Draft email to Receiver regarding motion for entry of final default in partition case.	PFV	0.20	\$550.00	\$110.00
04/23/2024	Review email from paralegal regarding clerk of court disclaimer.	PFV	0.10	\$550.00	\$55.00
04/23/2024	Review file regarding summary of problem units regarding Partition case.	PFV	0.20	\$550.00	\$110.00
04/24/2024	Continue working on motion for default judgment as to Elite Innovation, E. Phillips, v. Higgs, and Y. Barnes.	JS	0.20	\$295.00	\$59.00
04/24/2024	Conference call with mediator in unit owner class action case regarding request that the Association to attend a global mediation.	PFV	0.30	\$550.00	\$165.00
04/24/2024	Communications with mediator regarding same.	PFV	0.30	\$550.00	\$165.00
04/24/2024	Review email from counsel in unit owner class action regarding coverage position and request to join	PFV	0.20	\$550.00	\$110.00

	mediation.				
04/24/2024	Analyze prior insurance company position papers and rights, remedies, and insurance matters as to unit owner and renter class action claims (.7); and prepare email regarding same to receiver and receiver's counsel (.6).	PFV	1.30	\$550.00	\$715.00
04/24/2024	Emails to and from R. Zellman regarding various defendants in partition action (.2); review file with respect to motion for default final judgment (.3); conference with P. Valori regarding consents to final judgment from other defendants in case against roofer (.3).	rs	0.80	\$100.00	\$80.00
04/25/2024	Update on status and strategy and financial needs.	MME	0.40	\$550.00	\$220.00
04/25/2024	Additional communications with mediator in unit owner class action case.	PFV	0.20	\$550.00	\$110.00
04/25/2024	Email with counsel for putative unit owner class in class action case.	PFV	0.20	\$550.00	\$110.00
04/25/2024	Email regarding demolition status and planning as to completion, hydroseed and certificate of use and/or occupancy.	PFV	0.30	\$550.00	\$165.00
04/25/2024	Preliminary review of coverage position letters as to Prestige policy.	PFV	0.20	\$550.00	\$110.00
04/25/2024	Conference with M. Damian regarding status and planning and financial needs.	PFV	0.40	\$550.00	\$220.00
04/25/2024	Preliminary review of motion to intervene by renters.	PFV	0.20	\$550.00	\$110.00
04/25/2024	Draft email to Receiver regarding status.	PFV	0.10	\$550.00	\$55.00
04/25/2024	Draft email regarding preparation of response to motion to intervene and points of opposition regarding same.	PFV	0.20	\$550.00	\$110.00
04/25/2024	Email with counsel for Mr. Myrtl regarding response to threat of litigation.	PFV	0.30	\$550.00	\$165.00
04/25/2024	Draft status report to receiver regarding same.	PFV	0.10	\$550.00	\$55.00
04/26/2024	Review and analyze motion to intervene in preparation to draft a response in opposition.	JS	0.70	\$295.00	\$206.50
04/26/2024	Email with demolition company regarding status and planning.	PFV	0.20	\$550.00	\$110.00
04/26/2024	Email regarding case planning as to motion to intervene.	PFV	0.30	\$550.00	\$165.00
04/26/2024	Review loan history and work on assessment of current funding needs.	PFV	0.40	\$550.00	\$220.00
04/26/2024	Review partition service list and analyze service of	PFV	0.40	\$550.00	\$220.00

	process regarding Mr. Andrews and Mr. Simpson.				
04/26/2024	Review, analyze and update spreadsheet on all defendants as to service of process (1.0); emails to and from R. Zellman regarding various defendants as to service of process (.3); email to process server regarding status of unserved defendants in partition action (.2).	rs	1.50	\$100.00	\$150.00
04/29/2024	Review case file regarding preparation of Receiver's Fifth Report.	JS	1.10	\$295.00	\$324.50
04/29/2024	Review email to Deutsche Bank's counsel regarding acceptance of service of process in partition case.	PFV	0.10	\$550.00	\$55.00
04/29/2024	Draft email regarding opening of estate for Cardinal Andrews regarding partition case.	PFV	0.10	\$550.00	\$55.00
04/29/2024	Email regarding dismissal of Aegis mortgage in partition case.	PFV	0.10	\$550.00	\$55.00
04/29/2024	Attend status conference with Receiver.	MME	0.30	\$550.00	\$165.00
04/29/2024	Emails to counsel for Deutsche Bank (.2); emails to and from counsel for Aegis (.2); emails to and from R. Zellman (.2); draft notice of voluntary dismissal as to Aegis (.2).	rs	0.80	\$100.00	\$80.00
04/30/2024	Work on the Receiver's Fifth Report with focus on the demolition status section.	JS	0.60	\$295.00	\$177.00
04/30/2024	Review motion to intervene (.6); update research regarding a lessee's interest in property (.4); update research regarding section 1.230, Florida Statutes, with a focus on lack of sufficient interest to intervene by renters (.6).	JS	1.60	\$295.00	\$472.00
04/30/2024	Continue working on the Receiver's Fifth Report with a focus on the section concerning the Elite Innovation action.	JS	0.50	\$295.00	\$147.50
04/30/2024	Working on financial planning as to funding of Receivership.	MME	0.30	\$550.00	\$165.00
04/30/2024	Prepare for (.2); and attend (.7); zoom status conference with the unit owners.	PFV	0.90	\$550.00	\$495.00
04/30/2024	Conference regarding follow up as to unit 238 title issues.	PFV	0.20	\$550.00	\$110.00

Hours Subtotal 89.1

Fees Subtotal \$27,776.00

Expenses

Type	Date	Description	Quantity	Rate	Amount
Expense	02/01/2024	OTR Legal Process. Invoice 2024000009. Summons to be served on Cordell L. Black, copies, additional attempts, skip trace. Non-Served. 02.01.24	1.00	\$312.00	\$312.00
Expense	02/01/2024	OTR Legal Process. Invoice 2024000012. Summons to be served on Rusol & Company, Inc c/o Registered Agent. Copies, additional attempts, skip trace. Non-Served. 02.01.24	1.00	\$422.00	\$422.00
Expense	02/06/2024	Miami Dade Clerk of Courts, Issued 15 Civil Action Summons. 02.06.24	1.00	\$155.00	\$155.00
Expense	02/06/2024	Miami Dade Clerk of Courts. Issued 51 Civil Action Summons. 02.06.24	1.00	\$622.50	\$622.50
Expense	02/06/2024	Miami Dade Clerk of Courts. Issued 51 Civil Action Summons. 02.06.24	1.00	\$192.50	\$192.50
Expense	02/12/2024	Postage	2.00	\$0.64	\$1.28
Expense	02/19/2024	Miami Dade Clerk of Court. Filing 7 Civil Action Summons. 02.19.24	1.00	\$87.50	\$87.50
Expense	02/22/2024	Postage	2.00	\$0.64	\$1.28
Expense	02/23/2024	DLE Process Servers. Invoice 2024012896. Summons to be served on JVD Properties Inc c/o James Van Dyke Registered Agent. 02.23.26	1.00	\$45.00	\$45.00
Expense	02/23/2024	DLE Process Servers. Invoice 2024012898. Summons to be served on Waikiki Trusts c/o Sheldon W. Rubin as Registered Agent. 02.23.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012865. Summons to be on Home Financing Center Inc c/o Claudine Claus as Registered Agent. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012870. Summons to be served on Vintex Quality Care, Inc c/o Abo E. Omachonu. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process. Invoice 2024012876. US Bank Trust National Association, Owner Trustee for VRMTG Asset Trust, c/o CT Corporation System. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Invoice 2024012877. Summons to be served on Mortgage Electronic Registration Systems, Inc as Nominee for Aegis Wholesale Corporation c/o CT Corporation System. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012878. Summons to be served on Mortgage Electronic Registration System, Inc. c/o CT Corporation System.	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012881. Summons to be served on Deutsche Bank National Trust	1.00	\$45.00	\$45.00

Company as Trustee of Ameriquest Mortgage Securities, Inc Asset Backed Pass c/o CT Corporation System. 02.26.24					
Expense	02/26/2024	DLE Process Servers. Invoice 2024012883. Summons to be served on US Bank Trust National Association Not in its individual Capacity as Trustee of CitiGroup Mortgage Loan Trust c/o CT Corporation System. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012884. Summons to be served on Mortgage Electronic Registration System, Inc as Nominee for Rocket Mortgage LLC. Quicken Loans LLC. c/o CT Corporation System. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012885. Summons to be served on Ford Motor Credit Company LLC c/o CT Corporation System, as R/A 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012932. CFO service to be served on Progressive Select Insurance Company (a/s/o Benjamin Z. Silverstein) c/o Chief Financial Officer. 02.26.24	1.00	\$60.55	\$60.55
Expense	02/26/2024	DLE Process Servers. Invoice 2024012933. CFO Service to be served on Progressive American Insurance Company (a/s/o Erla Cadet) c/o Chief Financial Officer. 02.26.24	1.00	\$60.55	\$60.55
Expense	02/26/2024	DLE Process Servers. Invoice 2024012861. Summons to be served on Miami Dade County Board of County Commissioners. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012863. Summons to be served on Miami Dade of Clerk of Courts c/o Clerk of Court or any officer.	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012860. Summons to be served on Miami-Dade County c/o any authorized to accept.	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012900. Summons to be served on HSBC Bank, National Association as Trustee Under The Pooling and Servicing Agreement. c/o Shapiro & Fishman LLP Additional Address. 02.26.24	1.00	\$90.00	\$90.00
Expense	02/26/2024	DLE Process Servers. Invoice 2024012902. Summons to be served on Publix Employees Federal Credit Union c/o Corporate Creations Network as R/A. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/26/2024	DLE Process. Invoice 2024012891. Summons to be served on Tradition Community Association Inc c/o Kaye Bender Rembaum. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012866. Summons to be served on Dade County Federal Credit Union.	1.00	\$45.00	\$45.00

02.27.24					
Expense	02/27/2024	DLE Process Servers. Invoice 2024012887. Summons to be served on Le Club at Kendale Lakes Condominium Association, Inc. c/o Eisinger, Brown, Lewis, & Frankel, P.A. 02.27.24	1.00	\$45.00	\$45.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012888. Summons to be served on IDE Technologies, Inc c/o Itzhak Levy, as R/A. 02.26.24	1.00	\$45.00	\$45.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012931. Summons to be served on Florida Department of Revenue c/o Executive Director. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012927. Summons to be served on Aqua Finance, Inc c/o R/A Corporation Service Company. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012926. Summons to be served on Tidewater Finance Company c/o R/A Corporation Service Company. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012928. Summons to be served on Ygrene Energy Fund Florida LLC c/o R/A Corporation Service Company. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012929. Summons to be served on Cach, LLC c/o R/A Corporation Service. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012930. Summons to be served on Lvnv Funding LLC c/o R/A Corporation Service Company. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012924. Summons to be served on FIG, LLC c/o R/A John Finch. 02.27.24	1.00	\$60.00	\$60.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012868. Summons to be served on Surf Consultants Inc as Successor In Interest to Chase Bank USA, N.A Heritage Chase Card c/o Steven B. Sprechman, Esq. as R/A. 02.27.24	1.00	\$45.00	\$45.00
Expense	02/27/2024	DLE Process Servers. Invoice 2024012934. Summons to be served on Discover Bank c/o Registered Agent, Additional Address. 02.27.24	1.00	\$250.00	\$250.00
Expense	02/28/2024	Postage	2.00	\$0.64	\$1.28
Expense	02/28/2024	DLE Process Servers. Invoice 2024012925. Summons to be served on Asset Acceptance, LLC c/o R/A: Midland Credit Management.	1.00	\$60.00	\$60.00
Expense	02/28/2024	DLE Process Servers. Invoice 2024012839. Summons to be served on City of Miami Beach c/o Mayor Dan Gelber.	1.00	\$45.00	\$45.00
Expense	02/28/2024	DLE Process Servers. Invoice 2024012857. Summons	1.00	\$45.00	\$45.00

		to be served on ASR Partnership. 02.28.24			
Expense	02/29/2024	Photocopies	407.00	\$0.25	\$101.75
Expense	02/29/2024	Lexis Nexis Research Fee	1.00	\$3.26	\$3.26
Expense	02/29/2024	Webmaster. Annual Domain Renewal, Hosting Renewal for January, February and March.	1.00	\$53.85	\$53.85
Expense	02/29/2024	Accurint Research Fee	1.00	\$123.55	\$123.55
Expense	02/29/2024	DLE Process Servers. Invoice 2024012875. Summons to be served on United States Attorney's Office Southern District of Florida.	1.00	\$45.00	\$45.00
Expense	02/29/2024	DLE Process Servers. Invoice 2024012935. Summons to be served on Wells Fargo Home Mortgage, Inc. Additional Address. 02.29.24	1.00	\$250.00	\$250.00
Expense	02/29/2024	DLE Process Servers. Invoice 2024012859. Summons to be served on Internal Revenue Service c/o U.S. Attorney for The Southern District of Florida. 02.29.24	1.00	\$45.00	\$45.00
Expense	02/29/2024	DLE Process Servers. Invoice 2024012864. Summons to be served on PZA Group LLC c/o OSWO BH LLC. 02.29.24	1.00	\$45.00	\$45.00
Expense	03/01/2024	DLE Invoice 2024012874. Summons to be served on The Estate of Percival Simpson c/o James F. Simpson. 3.1.24	1.00	\$45.00	\$45.00
Expense	03/04/2024	DLE Process Servers. Invoice 2024012893. Summons to be served on Westland Plaza Condominium Association, Inc c/o Top Service Property Management. 03.04.24	1.00	\$45.00	\$45.00
Expense	03/06/2024	DLE Process Servers. Invoice 2024012873. Summons to be served on City of Miami Gardens c/o Mayor Rodney Harris III. 03.06.24	1.00	\$45.00	\$45.00
Expense	03/06/2024	OTR Legal Process. Invoice 2024000037. Skip Trace for Claude Cooper 3.06.24	1.00	\$195.00	\$195.00
Expense	03/11/2024	DLE Process Servers. Invoice 2024013461. Summons to be served on All in Credit Union (f/k/a Army Aviation Center Federal Credit Union) c/o Bobby Michael as R/A 3.11.24	1.00	\$60.00	\$60.00
Expense	03/11/2024	Postage	1.00	\$0.64	\$0.64
Expense	03/12/2024	DLE Process Servers. Invoice 2024012892. Summons to be served on Good Deeds Capital LLC c/o William Denis. "Non-served" 03.12.24	1.00	\$45.00	\$45.00
Expense	03/12/2024	OTR Legal Process. Invoice 2024000039. Summons to be served on Dana Lashaun Siplin. Copies, 03.12.24	1.00	\$65.20	\$65.20
Expense	03/13/2024	DLE Process Servers. Invoice 2024012890. Summons	1.00	\$45.00	\$45.00

		to be served on Flora M. Ramirez. "Non-Served" 03.13.24			
Expense	03/15/2024	DLE Process Servers. Invoice 2024017439. Summons to be served on Publix Employees Federal Credit Union c/o R/A: Scott McKim.	1.00	\$60.00	\$60.00
Expense	03/15/2024	Postage	1.00	\$0.64	\$0.64
Expense	03/20/2024	DLE Process Servers. Invoice 2024017637. Summons to be served on Flora M. Ramirez. Non Served. 03.20.24	1.00	\$45.00	\$45.00
Expense	03/20/2024	OTR Legal Process. Invoice 2024000038. Skip trace for Joye Antoinette Green Lawson. 03.20.24	1.00	\$195.00	\$195.00
Expense	03/21/2024	DLE Process Server. Invoice 2024012871. Summons to be served on Yvonne Martin. Non-Serve. 03.21.24	1.00	\$45.00	\$45.00
Expense	03/21/2024	DLE Process Servers. Invoice 2024012836. Summons to be served on Luz M. Morel. Non-serve. 03.21.24	1.00	\$45.00	\$45.00
Expense	03/21/2024	DLE Process Servers. Invoice 2024012872. Summons to be served on Nerilanda Destave. 03.21.24	1.00	\$45.00	\$45.00
Expense	03/21/2024	DLE Process Servers. Invoice 2024012842. Summons to be served on Safe Financial Group, LLC c/o Pablo Villalobos as R/A. "Non-Served" 03.21.24	1.00	\$45.00	\$45.00
Expense	03/25/2024	Miami Dade Clerk of Court, Civil Action Summons Partition Action. 03.25.24	1.00	\$17.50	\$17.50
Expense	03/25/2024	DLE Process Servers. Invoice 2024019547. Summons to be served on Safe Financial Group, LLC c/o Pablo Villalobos. 03.25.24	1.00	\$45.00	\$45.00
Expense	03/26/2024	Postage	1.00	\$0.64	\$0.64
Expense	03/26/2024	DLE Process Servers. Invoice 2024019922. Summons to be served on Naples Hma, LLC D/B/A Physicians Regional Medical Center - Collier c/o R.A Corporation Service. 03.26.24	1.00	\$60.00	\$60.00
Expense	03/28/2024	DLE Process Servers. Invoice 2024020651. Summons to be served on Mortgage Electronic Registration System, Inc. c/o CT Corporation System. 03.28.24	1.00	\$45.00	\$45.00
Expense	03/31/2024	Photocopies	364.00	\$0.25	\$91.00
Expense	04/05/2024	Postage	1.00	\$0.64	\$0.64
Expense	04/09/2024	OTR Legal Process. Invoice 2024000040. Skip Trace for Ira D. Cohen.	1.00	\$195.00	\$195.00
Expense	04/09/2024	DLE Process Servers. Invoice 2024012889. Summons to be served on Ira D. Cohen Irrevocable Family Trust. 04.09.24 Non-Served.	1.00	\$90.00	\$90.00

Expense	04/19/2024	OTR Legal Process, Invoice 2024000025. Summons to be served on Gus Ramirez, additional addresses, copies, skip trace, rush 4th address same day. 4.19.24	1.00	\$495.20	\$495.20
Expense	04/23/2024	Postage	1.00	\$0.64	\$0.64
Expense	04/30/2024	Lexis Nexis Research Fee	1.00	\$36.14	\$36.14
Expense	04/30/2024	Photocopies	265.00	\$0.25	\$66.25
				Expenses Subtotal	\$6,563.34

Name	Hours	Rate	Amount
Melanie Damian	2.3	\$550.00	\$1,265.00
Morgan Levine	14.9	\$350.00	\$5,215.00
Kenneth Murena	1.1	\$525.00	\$577.50
Adriana Pavon	1.5	\$295.00	\$442.50
Joseph Seara	16.8	\$295.00	\$4,956.00
Peter Valori	22.6	\$550.00	\$12,430.00
Reesea Saetae	28.9	\$100.00	\$2,890.00
Reesea Saetae	1.0	\$0.00	\$0.00
Hours Total			89.1
Subtotal			\$34,339.34
Amount			\$34,339.34

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Due from 11/1/23-4/30/24
(\$72,092.91	+ \$34,339.34) - (\$0.00) = \$106,432.25

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
23988	12/31/2023	\$43,830.53	\$0.00	\$43,830.53

242	01/31/2024	\$28,262.38	\$0.00	\$28,262.38
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Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
603	04/30/2024	\$34,339.34	\$0.00	\$34,339.34
Outstanding Balance from 11/1/23-12/31/23				\$43,830.53
Total Amount Due from 11/1/23-4/30/24				\$106,432.25

Please make all amounts payable to: Damian Valori Culmo

Payment is due upon receipt.

COMPOSITE EXHIBIT 3

Sacher Zelman Hartman, P.A.
Two Datan 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

February 25, 2024
Invoice Number 113217

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

PROFESSIONAL SERVICES

			Hours	
01/29/24	RMZ	Telephone call with Morgan Levine, Esq. regarding title requirements, et al.	0.50	
02/06/24	RMZ	Telephone call with Denise of Miami-Dade County Finance Department.	0.20	
		TOTAL HOURS AND FEES	0.70	346.50

DISBURSEMENTS

12/12/23		Recording Fees Simplifile		81.68
12/18/23		Recording Fees Simplifile		20.42
		TOTAL COST		102.10

February 25, 2024

Page 2

Invoice 113217

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

TOTAL STATEMENT

448.60

Fee Summary

Hours

Amount

Richard M. Zelman

0.70

346.50

Total Fees

0.70

346.50

01/25/24

PREVIOUS BALANCE

19,682.82

Total this Bill

448.60

NEW BALANCE

20,131.42

Accounts Receivable Aging

Current

448.60

30 Days

5,367.50

60 Days

2,475.02

90 Days

11,840.30

120 Days

0.00

Sacher Zelman Hartman, P.A.
Two Dattran 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

March 25, 2024
Invoice Number 113254

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

PROFESSIONAL SERVICES

Hours

03/11/24	RMZ	Review correspondence from Peter Valori, Esq; review file for Unit 139; prepare correspondence to Peter Valori, Esq. (2).	0.40
03/13/24	RMZ	Review status of missing Affidavits and various corrective documents.	0.80
03/20/24	RMZ	Review Units 203, 218 and 219 regarding Substitution of YGreen as defendant; prepare correspondence to Peter Valori, Esq., et al; review Unit 115 regarding Newrez Satisfaction request; prepare Memo to client.	0.50
03/21/24	RMZ	Telephone call with Justin Hakkemer, Esq; review correspondence from Peter Valori, Esq; prepare correspondence to Justine Hakkemer, Esq.; review	0.80

03/

March 25, 2024

Invoice 113254

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

03/

Release of Mortgage, Unit 139;
Clerk's Disclaimer of Interest.

03/25/24

RMZ

Review Clerk's Disclaimer; telephone call with Peter Valori, Esq; prepare correspondence to Deb Ullman of the Fund.

0.40

03/

Mar

Inv

311

TOTAL HOURS AND FEES

2.90

1,435.50

TOTAL STATEMENT

1,435.50

03/

03/

Fee Summary

Hours

Amount

03/

03/

Richard M. Zelman

2.90

1,435.50

Mar

Total Fees

2.90

1,435.50

Inv

311

02/25/24

PREVIOUS BALANCE

20,131,042.00

03/08/24

PAYMENT -THANK YOU-

-19,682.82

Total this Bill

1,435.50

NEW BALANCE

1,884.10

03/

03/

Accounts Receivable Aging

03/

Current

1,884.10

03/

30 Days

0.00

Mar

60 Days

0.00

Inv

90 Days

0.00

311

120 Days

0.00

20,131,042.00

-19,682.82

1,435.50

1,884.10

03/

03/

03/

Mar

Inv

311

20,131,042.00

-19,682.82

1,435.50

1,884.10

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ID#: 65-0212052

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

April 25, 2024
Invoice Number 113280

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

PROFESSIONAL SERVICES

Hours

03/27/24	RMZ	Telephone call with Deb Ullman of the Fund.	0.30
03/28/24	RMZ	Review correspondence from Peter Valori regarding lawsuit parties, etc; prepare correspondence to Peter Valori.	0.30
03/28/24	IC	Review updated title search through March 12, 2024. Review documents contained in title search.	2.50
04/04/24	RMZ	Review correspondence from Peter and Reasee regarding John Ruiz lien; prepare correspondence to Peter and Reasee; review updated title insurance commitment; conference with Iris Castillo.	0.80

03/1

04/1

April 25, 2024

Invoice 113280

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

04/04/24	IC	Review file and updated title report.	2.50	
04/04/24	IC	Conference with Richard M. Zelman regarding John Ruiz lien; research regarding John Ruiz lien.	0.50	
04/15/24	RMZ	Conference with Iris Castillo regarding Unit 135, et al; Unit 119.	0.20	
04/15/24	IC	Conference with Richard M. Zelman regarding Units 135 and 119.	0.20	
04/17/24	RMZ	Conference with Iris Castillo regarding Units 119, 139, 218, et al.	0.40	
04/19/24	RMZ	Conference with Iris Castillo regarding Judgment, Unit 119.	0.30	
04/19/24	IC	Review judgment for Unit 119.	0.40	
04/23/24	RMZ	Conference with Iris Castillo regarding Unit 219; prepare correspondence to Mortgagee.	0.20	
04/23/24	IC	Conference with Richard M. Zelman, Esq.	0.20	
TOTAL HOURS AND FEES			8.80	2,025.00
TOTAL STATEMENT				2,025.00

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	2.50	1,237.50
Iris Castillo	6.30	787.50
Total Fees	8.80	2,025.00

2,025.00
2,025.00

EXHIBIT 4

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 [D.E.51]**

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 \$10,615.00 for the period from February 1, 2024 through April 30, 2024;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver, incurred fees in the amount of \$27,776.00 and costs in the amount of \$6,563.34, for a total of \$34,339.34 for the period from February 1, 2024 through April 30, 2024; and

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver, incurred fees in the amount of \$3,807.00 and costs in the amount of \$102.10, for a total of \$3,909.10 for the period from January 29, 2024 through April 30, 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 Paragraph 2(c), *supra*, and the remaining fees and costs referenced in Paragraphs 2(a)-(b), *supra*, will be deferred to a later date.

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

CIRCUIT COURT JUDGE

Copies to all Counsel of Record