

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 TWELFTH 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 twelfth 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], Fourth Report [D.E. 49], Fifth Report [D.E. 51], Sixth Report [D.E. 53], Seventh Report [D.E. 56], Eighth Report [D.E. 57], Ninth Report [D.E. 61], Tenth Report [D.E. 71], and Eleventh Report [D.E. 76] including (i) his law firm, Gordon Rees Scully Mansukhani LLP (“GRSM”), (ii) Damian | Valori | Culmo as lead counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association (“Lead Counsel”), and (iii) an experienced real estate lawyer, Richard

(“Rick”) Zelman, Esq., through his law firm, Sacher Zelman Hartman, P.A., to assist in title related matters concerning the partition action described *infra* (“Special Counsel”). The Receiver has also retained Jacqueline D. Greenberg, CPA, LLC regarding preparation of Association tax filings and formerly Berger Singerman, LLP and now Fowler White Burnett regarding opening an estate regarding Cardinal Andrews and other probate matters (“Probate 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, 51, 53, 56, 57, 61, 71, 76], and this report, 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 March 3, 2026, attached hereto as **Exhibit 1** (Standard Fund Accounting Report).

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], February 26, 2024 [D.E. 50], May 29, 2024 [D.E. 52], September 13, 2024 [D.E. 55], May 2,

2025 [D.E. 59, 60], July 2, 2025 [D.E. 67], November 10, 2025 [D.E. 71], and February 19, 2026 [D.E. 80]. 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]. Damian | Valori | Culmo used its law firm line of credit to loan the Association \$210,000 at the rate that the Firm pays on its line for Association expenses.

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 fifteen Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and answering questions. The most recent Zoom unit owner meeting took place on November 21, 2025 at 4:00 p.m., with the next meeting scheduled for March 20, 2026 at 4:00 p.m.

D. Retrieval of Belongings.

As set forth in the Receiver's prior reports [D.E. 23, 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], 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

E. Written Notice Required for Repairs.

As referenced in the Receiver's prior reports [D.E. 23, 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], 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 (Miami Dade County, Florida Official Records 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*.

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.

F. Demolition.

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

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.

The demolition commenced on March 20, 2024 and was completed on May 23, 2024. The property is currently being maintained as a vacant lot, which will be available upon approval in the partition action for sale. Maintenance involves landscaping work as well as removal of illegally dumped waste.

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, 51, 53, 56, 57, 61, 71, 76], 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”).

On September 6, 2023, 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,*

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).

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”).

The Receiver, through Lead Counsel, continues to monitor the Eliteway Class Action as needed. On July 30, 2025, the court entered an order staying the action.

ii. Thomas Class Action and Renter Class Action

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], 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, 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].

On July 29, 2025, plaintiff’s counsel in the Thomas Class Action filed a motion to stay the case pending the resolution of the stay in the Renter’s class action against the Association, discussed below and the Eliteway Class Action discussed above.

On March 18, 2024, Lawonda Breedlove, Catresa Montgomery, Lovester Montgomery, Fuquan Thomas, Shekita Whitfield, Grecia Bozeman, and Joanna Manzi (collectively “Renters”) filed their alleged class action complaint against the Association in its individual capacity and in its purported representative capacity pursuant Florida Rule of Civil Procedure to Rule 1.221, as class representative of the members of the Association that own condominium units (“Unit Owners”), asserting a premises liability claim and a negligence claim against the Association in both capacities (“Renter Class Action”).⁵ The Association’s comprehensive general liability insurance carrier appointed counsel, and that counsel undertook the defense of that action.

The Receiver, through lead counsel, continues to monitor the Renters’ Class Action as needed.

On July 15, 2025, the court presiding over the Renters’ Class Action placed the case on inactive status pending the Association’s appeal of the Order Certifying the Renters’ Class Action.

iii. The Valtom Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], 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*

⁵The Renter Class Action is captioned *Breedlove v. New World Condominium Apartments Condominium Association, Inc.*, Case No. 2024-004925-CA-01 (Fla. 11th J. Cir. Ct.).

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, 51, 53, 56, 57, 61, 71, 76], 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, 51, 53, 56, 57, 61, 71, 76], 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, and the case remains on inactive status.

vi. Mechanic's Lien Action.

As referenced in the prior reports [D.E. 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], the Receiver, through Lead Counsel, demanded the roofing companies which were working on the Association's roof at the time of the January 28, 2023 fire remove the mechanic's lien which they filed against the Association on July 7, 2023 (Book 33784, Pages 1200-1201) because such lien was untimely and otherwise deficient. The roofing companies failed to respond to the foregoing demand. As such, the Receiver, through Lead Counsel, served subpoenas duces tecum upon the corporate representatives of the roofing companies, as well as the owners of the roofing companies. The corporate representative of one of the roofing companies, Elite Innovation Construction, Inc., and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), did not appear for their scheduled depositions on November 7, 2023. The corporate representative of the other roofing company, D.J.T.H., LLC, and its owner, Herby Myrtil (a/k/a Herby Myrtil) appeared for their scheduled depositions on November 22, 2023. Following the foregoing events, the Receiver, on behalf of the Association, commenced a separate action against Elite Innovation Construction, Inc. and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), to quiet title and discharge the above-referenced mechanic's lien. Further information concerning that action is set forth *infra*.

vii. The US Bank Action.

US Bank Trust, N.A. filed a complaint for foreclosure against, *inter alia*, a unit owner and the Association on September 16, 2024. *See US Bank Trust National Association. Not in its Individual Capacity but Solely as Owner Trustee for VRMTG Assert Trust. v. Small, et al.*, Case No. 2024-17645-CA-01 (Fla. 11th Cir. Ct. 2024) (the "US Bank Action"). The Receiver and Lead

Counsel appeared in the US Bank Action on November 14, 2024. On the same day, the Receiver moved to transfer that case from Division CA-09 to the above-captioned Division CA-11 and moved to dismiss or stay the US Bank Action. The motion to transfer was heard on January 29, 2025, via Zoom and was granted that same day. The Receiver moved to stay the US Bank Action, the court presiding over that action entered an *Order Placing Case on Inactive Status* on March 5, 2025, and the case remains on inactive status.

viii. The Hiscox Declaratory Judgment Action

Hiscox Insurance Company, Inc. (“Hiscox”) filed a declaratory judgment action in the United States District Court for the Southern District of Florida against Prestige, the Receiver, the Renters, and certain Unit Owners relating to in insurance policy pertaining claims brought by the defendants against Prestige. *See Hiscox Insurance Company, Inc. v. Prestige Management Solutions, Inc.*, Case No. 25-cv-22368-KWM. The Receiver has answered the complaint and the action remains pending, with a trial set for November 2, 2026. Mediation is scheduled for May 1, 2026.

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, 51, 53, 56, 57, 61, 71, 76], 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”).⁶

The Receiver moved for summary judgment on December 18, 2024 [D.E. 500] as to Counts I and II of the Second Amended Complaint and petitioned the Court to, *inter alia*, appoint the Receiver as Special Magistrate pursuant to section 64.061(4), Florida Statutes, for the purpose of selling the Condominium Property free and clear of all liens and encumbrances.

The Court held a hearing on the Receiver’s motion for summary judgment on February 21, 2025, and entered an order granting the motion, in part, on February 24, 2025 (“Final Summary Judgment of Partition”).

The Renters moved to intervene in the Partition Action [D.E. 455], and the court denied their Motion [D.E. 523], which the Renters appealed [D.E. 527]. The appeal was resolved in favor of the Receiver. *See* Case No.: 3D25-0543, Florida Third District Court of Appeal.

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

ii. The Prestige Action.

As referenced in the prior reports [D.E. 29, 40, 49, 51, 53, 56, 57, 61, 71, 76], 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

⁶The 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.

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.

On January 2, 2024, 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, 51, 53, 56, 57, 61, 71, 76] and/or his foregoing Twelfth 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”), Jacqueline D. Greenberg, CPA, regarding preparation of Association tax filings, and counsel originally with Berger Singerman, LLP and now with Fowler White Burnett regarding opening an estate regarding Cardinal Andrews (“Probate 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 GRSM from November 1, 2025 through January 31, 2026 and Lead Counsel from November 1, 2025 through October 31, 2026 for the benefit of the Association, as well as the Receiver’s reductions thereto. The fees and costs incurred by Special Counsel are reflected on the invoices attached hereto as **Composite Exhibit 3** and reflect the time entries and work performed by Special Counsel for the benefit of the Association from November 1, 2025 through January 31, 2026, as well as the Receiver’s reductions thereto. The fees and costs incurred by Probate Counsel are reflected in the invoice attached hereto as **Composite Exhibit 4** and reflect the time entries and work performed by Probate Counsel for the benefit of the Association from November 1, 2025 through January 31, 2026.

As reflected in **Composite Exhibit 2**, from November 1, 2025 through January 31, 2026, GRSM incurred fees in the total amount of \$6,3750.00 and costs in the amount of \$0, for a total amount of \$6,375.00, and from November 1, 2025 through January 31, 2026, Lead Counsel

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.

incurred fees in the amount of \$27,900.00 and costs in the amount of \$31,492.25, for a total amount of \$59,392.25.

As reflected in **Composite Exhibit 3**, from November 1, 2025 to January 31, 2026, Special Counsel incurred fees in the amount of \$2,227.50.

As reflected in **Composite Exhibit 4**, from November 1, 2025 through January 31, 2026, Probate Counsel incurred fees in the total amount of \$2,092.50, and costs in the amount of \$0, for a total amount of \$2,092.50.

As reflected in **Exhibit 5**, Jacqueline Greenberg, as CPA, incurred fees in the amount of \$612.50 and costs in the amount of \$56.45, for a total of \$668.95 for work performed in January 2026 related to the 2025 tax matters.

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees of Special Counsel from November 1, 2025 through January 31, 2026, in the total amount of \$2,227.50, the fees and costs of Probate Counsel from November 1, 2025 through January 31, 2025 in the total amount of \$2,092.50 for Fowler While Burnett, and of Jacqueline Greenberg, as CPA for work performed in January 2026 for a total of \$668. GRSM seek approval of their fees and costs from November 1, 2025 through January 31, 2026 and Lead Counsel seek approval of their fees and costs from November 1, 2026 through January 31, 2026, 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 6**.

CERTIFICATION

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

(a) I have read this application (the “Application”);

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

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

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

Respectfully submitted,

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By: s/David M. Gersten

David M. Gersten
Florida Bar No. 205801

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 16th day of March 2026.

By: s/Peter F. Valori
Peter F. Valori

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 3/3/26

		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]	\$ 1,301,152.37	\$ 1,301,152.37	\$ 1,301,152.37
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 460.09	\$ 460.09	\$ 460.09
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available (Lines 1-8):			\$ 1,301,612.46
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 1,301,037.61	\$ 1,301,037.61	\$ 1,301,037.61
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 1,301,037.61
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)			\$ 1,301,037.61
Line 13	Ending Balance (As of March 3, 2026)			\$ 574.85
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 574.85

[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
5/2/2024	Maintenance Fee Deposit	\$ 1,435.21

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

Date of Check	From	Amount
5/7/2024	Maintenance Fee Deposit	\$ 397.77
5/17/2024	Maintenance Fee Deposit	\$ 1,293.58
5/28/2024	Maintenance Fee Deposit	\$ 582.00
5/31/2024	Maintenance Fee Deposit	\$ 859.40
6/7/2024	Maintenance Fee Deposit	\$ 1,563.85
6/12/2024	Maintenance Fee Deposit	\$ 397.77
6/17/2024	Maintenance Fee Deposit	\$ 313.34
6/20/2024	Damian Valori Culmo Loan	\$ 1,000.00
6/24/2024	Maintenance Fee Deposit	\$ 313.00
6/27/2024	Damian Valori Culmo Loan	\$ 110,000.00
6/28/2024	Maintenance Fee Deposit	\$ 269.00
7/2/2024	Maintenance Fee Deposit	\$ 1,435.21
7/9/2024	Maintenance Fee Deposit	\$ 1,108.88
7/18/2024	Maintenance Fee Deposit	\$ 313.34
7/30/2024	refund of bank fees	\$ 30.00
7/30/2024	Maintenance Fee Deposit	\$ 1,270.09
8/14/2024	Maintenance Fee Deposit	\$ 1,422.22
8/22/2024	Maintenance Fee Deposit	\$ 822.86
8/30/2024	Maintenance Fee Deposit	\$ 851.60
9/12/2024	Maintenance Fee Deposit	\$ 1,961.63
9/23/2024	Maintenance Fee Deposit	\$ 5,440.01
10/1/2024	Maintenance Fee Deposit	\$ 851.60
10/11/2024	Maintenance Fee Deposit	\$ 937.18
10/11/2024	Maintenance Fee Deposit	\$ 313.34
10/15/2024	Maintenance Fee Deposit	\$ 711.11
10/30/2024	Maintenance Fee Deposit	\$ 1,128.53
10/31/2024	Damian Valori Culmo Loan	\$ 9,000.00
11/7/2024	Maintenance Fee Deposit	\$ 1,832.86
11/15/2024	Maintenance Fee Deposit	\$ 397.77
11/22/2024	Maintenance Fee Deposit	\$ 276.93
12/2/2024	Maintenance Fee Deposit	\$ 851.60
12/4/2024	Maintenance Fee Deposit	\$ 980.11
12/9/2024	Maintenance Fee Deposit	\$ 852.75
12/18/2024	Maintenance Fee Deposit	\$ 397.77
12/26/2024	Maintenance Fee Deposit	\$ 276.93
1/6/2025	Maintenance Fee Deposit	\$ 1,433.94
1/6/2025	Damian Valori Culmo Loan	\$ 10,000.00
1/13/2025	Maintenance Fee Deposit	\$ 1,648.29
1/30/2025	Maintenance Fee Deposit	\$ 545.93
1/31/2025	Maintenance Fee Deposit	\$ 851.60
2/4/2025	Maintenance Fee Deposit	\$ 313.34
2/7/2025	Damian Valori Culmo Loan	\$ 10,000.00
2/10/2025	Maintenance Fee Deposit	\$ 1,334.95
2/13/2025	Maintenance Fee Deposit	\$ 313.34
2/26/2025	Maintenance Fee Deposit	\$ 276.93

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

Date of Check	From	Amount
3/4/2025	Maintenance Fee Deposit	\$ 1,704.35
3/11/2025	Maintenance Fee Deposit	\$ 1,377.88
3/25/2025	Maintenance Fee Deposit	\$ 276.93
3/31/2025	Maintenance Fee Deposit	\$ 313.34
4/4/2025	Maintenance Fee Deposit	\$ 851.60
4/9/2025	Maintenance Fee Deposit	\$ 1,250.55
4/17/2025	Maintenance Fee Deposit	\$ 269.00
4/23/2025	Damian Valori Culmo Loan	\$ 10,000.00
4/28/2025	Maintenance Fee Deposit	\$ 397.77
5/1/2025	Maintenance Fee Deposit	\$ 815.19
5/5/2025	Maintenance Fee Deposit	\$ 1,563.86
5/12/2025	Maintenance Fee Deposit	\$ 711.11
5/30/2025	Maintenance Fee Deposit	\$ 538.26
6/2/2025	Maintenance Fee Deposit	\$ 276.93
6/6/2025	Maintenance Fee Deposit	\$ 711.11
6/12/2025	Maintenance Fee Deposit	\$ 1,206.21
6/12/2025	Damian Valori Culmo Loan	\$ 10,000.00
7/15/2025	Maintenance Fee Deposit	\$ 2,656.01
7/21/2025	Maintenance Fee Deposit	\$ 397.77
8/4/2025	Maintenance Fee Deposit	\$ 1,710.87
8/7/2025	Damian Valori Culmo Loan	\$ 10,000.00
8/19/2025	Maintenance Fee Deposit	\$ 937.21
9/2/2025	Maintenance Fee Deposit	\$ 538.26
9/2/2025	Damian Valori Culmo Loan	\$ 10,000.00
9/3/2025	Maintenance Fee Deposit	\$ 313.34
9/9/2025	Maintenance Fee Deposit	\$ 882.34
9/16/2025	Maintenance Fee Deposit	\$ 553.86
10/1/2025	Maintenance Fee Deposit	\$ 807.26
10/7/2025	Maintenance Fee Deposit	\$ 626.68
10/22/2025	Maintenance Fee Deposit	\$ 830.79
10/29/2025	Maintenance Fee Deposit	\$ 538.26
10/30/2025	Damian Valori Culmo Loan	\$ 10,000.00
11/4/2025	Maintenance Fee Deposit	\$ 313.34
11/7/2025	Maintenance Fee Deposit	\$ 582.34
12/1/2025	Maintenance Fee Deposit	\$ 538.26
12/5/2025	Maintenance Fee Deposit	\$ 313.34
12/8/2025	Maintenance Fee Deposit	\$ 313.34
12/23/2025	Maintenance Fee Deposit	\$ 269.00
12/29/2025	Maintenance Fee Deposit	\$ 538.26
12/29/2025	Damian Valori Culmo Loan	\$ 10,000.00
1/12/2026	Maintenance Fee Deposit	\$ 2,243.92
1/26/2026	Maintenance Fee Deposit	\$ 313.34
2/2/2026	Maintenance Fee Deposit	\$ 538.26
2/2/2026	Damian Valori Culmo Loan	\$ 10,000.00
2/10/2026	Maintenance Fee Deposit	\$ 313.34
3/2/2026	Maintenance Fee Deposit	\$ 851.60
Total		\$ 1,301,152.37

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

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
5/31/2024	interest	\$ 0.30
6/30/2024	interest	\$ 0.71
7/31/2024	interest	\$ 0.62
8/31/2024	interest	\$ 0.35
9/30/2024	interest	\$ 0.14
10/31/2024	interest	\$ 0.14
11/30/2024	interest	\$ 0.23
12/31/2024	interest	\$ 0.12
1/31/2025	interest	\$ 0.30
2/28/2025	interest	\$ 0.20
3/31/2025	interest	\$ 0.44
4/30/2025	interest	\$ 0.28
5/31/2025	interest	\$ 0.31
6/30/2025	interest	\$ 0.31
7/31/2025	interest	\$ 0.34
8/31/2025	interest	\$ 0.26
9/30/2025	interest	\$ 0.45
10/31/2025	interest	\$ 0.21
11/30/2025	interest	\$ 0.33
12/31/2025	interest	\$ 0.13
1/31/2026	interest	\$ 0.26
2/28/2026	interest	\$ 0.37
Total		\$ 460.09

GRAND TOTAL OF RECEIPTS

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

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

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

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

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

Date	From	Amount
9/18/2023	wire fee	\$ 15.00
9/19/2023	Demolition Gods	\$ 93,750.00
9/19/2023	wire fee	\$ 15.00
9/19/2023	Sacher Zelman Harman PA	\$ 14,407.00
9/19/2023	Maverick Security Services	\$ 8,448.72
9/29/2023	Telephone Service	\$ 20.00
10/1/2023	New Wave Loan	\$ 3,300.00
10/6/2023	Maverick Security Sevices	\$ 8,448.72
10/16/2023	Maverick Security Services	\$ 8,448.72
10/18/2023	New Wave Loan	\$ 4,125.00
10/30/2023	Maverick Security Services	\$ 8,448.72
10/31/2023	Telephone Service	\$ 20.00
11/1/2023	New Wave Loan	\$ 3,300.00
11/14/2023	Maverick Security Services	\$ 8,448.72
11/18/2023	New Wave Loan	\$ 4,125.00
11/28/2023	Maverick Security Services	\$ 8,750.46
11/30/2023	Telephone Service	\$ 20.00
12/1/2023	New Wave Loan	\$ 3,300.00
12/7/2023	Sacher Zelman Harman PA	\$ 7,198.35
12/13/2023	Maverick Secuity Services	\$ 8,488.72
12/18/2023	New Wave Loan	\$ 4,125.00
12/27/2023	Maverick Security Services	\$ 8,750.46
12/29/2023	HSM Consulting	\$ 825.00
12/30/2023	Telephone Service	\$ 20.00
1/1/2024	New Wave Loan	\$ 3,300.00
1/2/2024	City of Miami Gardens	\$ 2,817.50
1/10/2024	Maverick Security Services	\$ 9,353.94
1/18/2024	New Wave Loan	\$ 4,125.00
1/18/2024	City of Miami Gardens	\$ 10,092.50
1/24/2024	Maverick Secuity Services	\$ 8,448.72
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
2/6/2024	Maverick Security Services	\$ 8,448.72
2/20/2024	New Wave Loan	\$ 4,125.00
2/21/2024	City of Miami Gardens	\$ 264.10
2/21/2024	Maverick Security Services	\$ 8,448.72
2/26/2024	Sacher Zelman Harmon PA	\$ 19,682.82
2/26/2024	Cimo Mazer Mark PLLC	\$ 4,102.50

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
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
3/20/2024	Alex Ochoa - lawn maintenance	\$ 400.00
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
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
4/25/2024	Demolition Gods	\$ 93,750.00
4/25/2024	Demolition Gods	\$ 15.00
4/30/2024	Telephone Service	\$ 20.00
5/1/2024	New Wave Loan	\$ 3,300.00
5/2/2024	Maverick Security Services	\$ 6,839.44
5/18/2024	New Wave Loan	\$ 4,125.00
5/30/2024	Telephone Service	\$ 20.00
6/1/2024	New Wave Loan	\$ 3,300.00
6/18/2024	New Wave Loan	\$ 4,125.00
6/28/2024	Demolition Gods	\$ 93,750.00
6/28/2024	Demolition Gods	\$ 15.00
6/30/2024	Telephone Service	\$ 20.00
7/1/2024	New Wave Loan	\$ 3,300.00
7/2/2024	The Madison Insurance Group	\$ 2,312.95
7/18/2024	New Wave Loan	\$ 4,125.00
7/29/2024	Telephone Service	\$ 20.00
8/1/2024	New Wave Loan	\$ 3,300.00
8/14/2024	US Treasury	\$ 59.00
8/20/2024	New Wave Loan	\$ 4,125.00
8/23/2024	Las Nueces Landscape & Trimming	\$ 300.00
8/26/2024	Las Nueces Landscape & Trimming	\$ 1,300.00
8/31/2024	Telephone Service	\$ 20.00
9/1/2024	New Wave Loan	\$ 3,300.00
9/12/2024	New Wave Loan	\$ 4,125.00
9/30/2024	Telephone Service	\$ 20.00

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

Date	From	Amount
10/1/2024	New Wave Loan	\$ 3,300.00
10/15/2024	New Wave Loan	\$ 4,125.00
10/30/2024	Telephone Service	\$ 20.00
11/1/2024	New Wave Loan	\$ 3,300.00
11/7/2024	New Wave Loan	\$ 4,207.50
11/7/2024	Las Nueces Landscape & Trimming	\$ 1,050.00
11/30/2024	Telephone Service	\$ 20.00
12/1/2024	New Wave Loan	\$ 3,300.00
12/18/2024	New Wave Loan	\$ 4,207.50
12/31/2024	Telephone Service	\$ 20.00
1/2/2025	New Wave Loan	\$ 3,432.00
1/18/2025	New Wave Loan	\$ 4,207.50
1/31/2025	Telephone Service	\$ 20.00
2/4/2025	New Wave Loan	\$ 3,366.00
2/13/2025	New Wave Loan	\$ 4,207.50
2/21/2025	Department of Treasury	\$ 17.00
2/28/2025	Telephone Service	\$ 20.00
3/4/2025	New Wave Loan	\$ 3,366.00
3/10/2025	Las Nueces Landscape & Trimming	\$ 990.06
3/13/2025	New Wave Loan	\$ 4,207.50
3/30/2025	Telephone Service	\$ 20.00
4/4/2025	New Wave Loan	\$ 3,366.00
4/13/2025	New Wave Loan	\$ 4,207.50
4/23/2025	Appraisal First Real Estate Appraisers	\$ 3,000.00
4/23/2025	Appraisal First Real Estate Appraisers	\$ 15.00
4/30/2025	Telephone Service	\$ 20.00
5/4/2025	New Wave Loan	\$ 3,366.00
5/13/2025	New Wave Loan	\$ 4,207.50
5/30/2025	Telephone Service	\$ 20.00
6/2/2025	New Wave Loan	\$ 3,366.00
6/12/2025	Avante - Nea Insurance	\$ 2,582.75
6/18/2025	New Wave Loan	\$ 4,207.50
6/25/2025	Las Nueces Landscape & Trimming	\$ 1,050.00
6/30/2025	Telephone Service	\$ 20.00
7/30/2025	Telephone Service	\$ 20.00
8/7/2025	New Wave Loan	\$ 7,788.00
8/7/2025	New Wave Loan	\$ 7,573.50
8/30/2025	Telephone Service	\$ 20.00
9/2/2025	New Wave Loan	\$ 7,788.00
9/30/2025	Telephone Service	\$ 20.00
10/2/2025	New Wave Loan	\$ 7,788.00

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

Date	From	Amount
10/30/2025	Telephone Service	\$ 20.00
11/2/2025	New Wave Loan	\$ 7,788.00
11/7/2025	Las Nueces Landscape & Trimming	\$ 1,116.00
11/30/2025	Telephone Service	\$ 20.00
12/1/2025	New Wave Loan	\$ 7,788.00
12/30/2025	Telephone Service	\$ 20.00
1/1/2026	New Wave Loan	\$ 7,788.00
1/30/2026	Telephone Service	\$ 20.00
2/1/2026	New Wave Loan	\$ 7,788.00
2/25/2026	Enviroscape Landscape & Design	\$ 1,275.00
2/25/2026	Enviroscape Landscape & Design	\$ 18.00
2/28/2026	Telephone Service	\$ 20.00
3/1/2026	New Wave Loan	\$ 7,788.00
3/4/2026	Enviroscape Landscape & Design	\$ 1,275.00
3/4/2026	Enviroscape Landscape & Design	\$ 18.00
3/31/2026	Telephone Service	\$ 20.00
GRAND TOTAL OF EXPENSES		\$ 1,301,037.61



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

December 5, 2025
ID: GERSP 1299620
Invoice No. 22050289
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH November 30, 2025

Fees For Professional Services:	\$1,425.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,425.00

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 10% (Ten percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
11/04/25	Review court order .1; review court filing/order .1	DMG2	0.20
11/06/25	Review Arthur Porosoff email with contract attached for review and signing .1	DMG2	0.10
11/09/25	Review court order .1; review peter Valori email re: mediation .1	DMG2	0.20
11/11/25	Review and respond to Peter Valori email with update re: case .1; review and respond to Peter Valori email re: court sale .1; review Peter Valori email re: court ordered sale .1	DMG2	0.30
11/13/25	Review court order .1; review court order and email to Peter Valori re: same .1	DMG2	0.20
11/14/25	Review and respond to Peter Valori email re: court hearing .1	DMG2	0.10
11/21/25	Zoom conference with owners re: status of case and listing of property .6	DMG2	0.60
11/26/25	Review Gia Abreu email re: dismissal .1; review Peter Valori email re: court service .1	DMG2	0.20

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	1.90	1,425.00

TOTAL FOR SERVICES

\$1,425.00

Outstanding Statements as of December 5, 2025

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
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
Statement No 21575686	May 14, 2024	\$4,465.00
Statement No 21601874	June 18, 2024	\$4,330.00
Statement No 21619540	July 11, 2024	\$2,550.00
Statement No 21646597	August 14, 2024	\$1,125.00
Statement No 21661899	September 5, 2024	\$3,185.00
Statement No 21695545	October 15, 2024	\$525.00
Statement No 21713002	November 6, 2024	\$975.00
Statement No 21743313	December 11, 2024	\$1,125.00
Statement No 21770677	January 16, 2025	\$1,575.00
Statement No 21788288	February 13, 2025	\$975.00
Statement No 21817354	March 14, 2025	\$4,500.00
Statement No 21852728	April 25, 2025	\$2,799.85
Statement No 21875054	May 21, 2025	\$6,983.57
Statement No 21902890	June 24, 2025	\$5,850.00
Statement No 21927193	July 22, 2025	\$2,310.00
Statement No 21944854	August 12, 2025	\$6,934.76
Statement No 21979770	September 22, 2025	\$975.00
Statement No 22010647	October 22, 2025	\$975.00
Statement No 22023261	November 7, 2025	\$2,700.00

Total Accounts Receivable Balance:

\$126,318.15



GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

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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

December 5, 2025
ID: GERSP 1299620
Invoice No. 22050289
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH November 30, 2025

Fees For Professional Services:	\$1,425.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,425.00

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: 22050289

LOCKBOX ADDRESS FOR CHECKS

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

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GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300
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(510) 463-8600
Tax ID: 94-1617026

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

January 50, 5052
ID: GERSP 1599250
Invoice 6 o. 550N8NB0
Gersten, David M.

RE: Waptiste v. 6 ew \$ orld Condominium

BILLING SUMMARY THROUGH December 31, 2025

Fees For Professional Services:	43,08x.00
E; penses and Advances:	<u>0.00</u>
Current Bill:	\$3,075.00

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 10% (Ten 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>
15/01/5x	Review Peter Valori email with proposed filing for review and approval .1Zreview court filing .1	DMG5	0.50
15/05/5x	Review and respond to Peter Valori email re: offer .1Zreview court filing .1Zreview and respond to Peter Valori email re: potential buyer .1	DMG5	0.30
15/03/5x	Review court filing .1Zconference with real estate broker and Peter Valori re: offer and marketing strategy .x	DMG5	0.20
15/0B/5x	Review court filing .1Zreview new marketing reports .1	DMG5	0.50
15/0x/5x	Review Ric Oelman email with bill attached for review .1	DMG5	0.10
15/09/5x	Email to Peter Valori re: property/ marketing .1Zreview Peter Valori email re: getting more information re: selling property .1Zreview court order .1	DMG5	0.30
15/10/5x	Review and respond to Peter Valori email re: appraisal report .1Zreview Peter Valori email re: auction information .1Zreview Javier k beda/Peter Valori emails re: developers .1Zreview and respond to Javier k beda/Peter Valori emails re: units and zoning .1Zreview multiple emails from Peter Valori/Wo7er re: property .1	DMG5	0.x0
15/1B/5x	Review and respond to Peter Valori email re: auction potential .1Zreview and respond to multiple Peter Valori emails re: marketing .1	DMG5	0.50
15/1x/5x	Conference with Arthur Porosoff, Peter Valori and multiple brokers re: auction platform re: marketing and selling the property in this difficult real estate environment 1.3Zreview Peter Valori email(s) re: court filing .1	DMG5	1.B0
15/12/5x	Review Reesea Setae email with court filing attached .1	DMG5	0.10
15/18/5x	Review and sign revised listing price pursuant to previous discussions with broker and Peter Valor and confirmed by Melanie Damian .1	DMG5	0.10
15/1N/5x	Review court filing .1	DMG5	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG5	David Gersten	Partner	8x0.00	B10	3,08x.00

TOTAL FOR SERVICES

\$3,075.00

Outstanding Statements as of January 20, 2026

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement 6 o 51352853	May 18, 5053	41x,9xx.00
Statement 6 o 5138B0N8	July 31, 5053	4B,N9x.00
Statement 6 o 513N8N89	August 1N, 5053	450,31B98
Statement 6 o 51B1x0x3	September 5N, 5053	48,Bxx.00
Statement 6 o 51B5B0x2	Hctober 15, 5053	4B,58x.00
Statement 6 o 51BBx391	6 ovember 13, 5053	45,850.00
Statement 6 o 51B81353	December 1x, 5053	43,xN0.00
Statement 6 o 51B98132	January 52, 505B	43,B00.00
Statement 6 o 51x03B82	February 8, 505B	45,81x.00
Statement 6 o 51x3N135	March 55, 505B	41,x8x.00
Statement 6 o 51xx00xx	April 10, 505B	4B,x8x.00
Statement 6 o 51x8x2N2	May 1B, 505B	4B,B2x.00
Statement 6 o 51201N8B	June 1N, 505B	4B,330.00
Statement 6 o 51219xB0	July 11, 505B	45,xx0.00
Statement 6 o 512B2x98	August 1B, 505B	41,15x.00
Statement 6 o 51221N99	September x, 505B	43,1Nk.00
Statement 6 o 5129xxBx	Hctober 1x, 505B	4x5x.00
Statement 6 o 51813005	6 ovember 2, 505B	498x.00
Statement 6 o 518B3313	December 11, 505B	41,15x.00
Statement 6 o 51880288	January 12, 505x	41,x8x.00
Statement 6 o 518NN5NN	February 13, 505x	498x.00
Statement 6 o 51N183xB	March 1B, 505x	4B,x00.00
Statement 6 o 51Nk585N	April 5x, 505x	45,899.Nk
Statement 6 o 51N8x0xB	May 51, 505x	42,9NB.x8
Statement 6 o 51905N90	June 5B, 505x	4x,Nk0.00
Statement 6 o 51958193	July 55, 505x	45,310.00
Statement 6 o 519BBNkB	August 15, 505x	42,93B82
Statement 6 o 51989880	September 55, 505x	498x.00
Statement 6 o 550102B8	Hctober 55, 505x	498x.00
Statement 6 o 55053521	6 ovember 8, 505x	45,800.00

David Gersten Special Magistrate
ID: GERSP 1599250
Invoice 6 o.: 550N8NB0

January 50, 5052
Page B

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement 6 o 550x05N9	December x, 505x	41,85x.00
Total Accounts Receivable Balance:		<u><u>\$127,743.15</u></u>

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GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

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Tax ID: 94-1617026

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

January 50, 5052
ID: GERSP 1599250
Invoice 6 o. 550N8NB0
Gersten, David M.

RE: Waptiste v. 6 ew \$ orld Condominium

BILLING SUMMARY THROUGH December 31, 2025

Fees For Professional Services:	43,08x.00
E; penses and Advances:	<u>0.00</u>
Current Bill:	\$3,075.00

A/R OPERATING ACCOUNT WIRE INFORMATION

Weneficiary Wán7 6 ame: \$ ells Fargo Wán7, 6 .A..
Wán7 Address: B50 Montgomery Street, San Francisco, CA 9BI0B
Weneficiary Account: Gordon Rees Scully Mansu7hani, LLP
Account 6 umber: 130111N09x
AWA 6 umber (AC-): 1510B5NN5
Federal Ta; ID: 9B-1218052

Domestic and International fund transfer process:
AWA 6 umber (\$ ires): 1510005BN
Swift code: Domestic U1510005BN
International US FWk S2S
Reference: 550N8NB0

LOCKBOX ADDRESS FOR CHECKS

Loc7bo; Services W6; #: 3995xN
3BB0 Flair Drive
El Monte, CA 91831-5N53

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(510) 463-8600
Tax ID: 94-1617026

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Miami, FL 33131
dgersten@grsm.com

February 15, 2021
:DRGE6 SP 1299120
:nvoice No. 2211809B
Gersten, David M.

6 ERWaptiste v. New \$ orld Condominium

BILLING SUMMARY THROUGH January 31, 2026

Fees For Professional ServicesR	41,858.00
Expenses and AdvancesR	<u>0.00</u>
Current Bill:	\$1,875.00

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 10% (Ten percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
01/05/21	6 eview and respond to Peter ; alori email reVdismissal .1Vreview opinion from appellate court .1	DMG2	0.20
01/08/21	6 eview Peter ; alori email reRmotion .1	DMG2	0.10
01/13/21	6 eview 6 ichard Zelman email with bill attached for review .1	DMG2	0.10
01/11/21	6 eview Peter ; alori email with L7 : and information sheet attached for review .2Vreview Maia Aron email reRpayment .1	DMG2	0.30
01/15/21	6 eview Peter ; alori email reRoffer .1Vreview and respond to Peter ; alori email reRsscreenshot .1	DMG2	0.20
01/18/21	6 eview and respond to Peter ; alori email reRdiscuss offer .1	DMG2	0.10
01/19/21	6 eview and respond to Peter ; alori/Melanie Damian emails reRoffer .1	DMG2	0.10
01/21/21	Conference with Developer reRproperty .1Vemail to Peter ; alori to obtain information to send to developer reRsell property .1	DMG2	0.20
01/25/21	Emailed information to developer .1Vreview and respond to Peter ; alori email reRtax deed .1Vreview court issued mandate in appeal .1	DMG2	0.30
01/28/21	6 eview and respond to developer email reRselling the property .1Vreview Peter ; alori email reRcourt filing .1	DMG2	0.20
01/29/21	Email to Peter ; alori reRconference reRselling property .1	DMG2	0.10
01/30/21	Conference with Peter ; alori and Melanie Damian reRsale of property .8Vreview Peter ; alori email to Miami Gardens city attorney reR possible purchase of property .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	580.00	2.80	1,658.00

TOTAL FOR SERVICES

\$1,875.00

Outstanding Statements as of February 17, 2026

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 2132I 523	May 15, 2023	418,988.00
Statement No 213500B5	July 31, 2023	40,998.00
Statement No 213B5B59	August 1B, 2023	420,310.95
Statement No 210I8083	September 2B, 2023	45,088.00
Statement No 2102008I	October 12, 2023	40,258.00
Statement No 21008391	November 13, 2023	42,520.00
Statement No 21051323	December 18, 2023	43,800.00
Statement No 2109513I	January 2I, 2020	43,000.00
Statement No 2180305I	February 5, 2020	42,518.00
Statement No 2183B132	March 22, 2020	41,858.00
Statement No 21880088	April 10, 2020	40,858.00
Statement No 21858I BI	May 10, 2020	40,000.00
Statement No 21I01B5O	June 1B, 2020	40,330.00
Statement No 21I19800	July 11, 2020	42,880.00
Statement No 21I0I 895	August 10, 2020	41,128.00
Statement No 21I11B99	September 8, 2020	43,108.00
Statement No 21I98808	October 18, 2020	4,828.00
Statement No 21513002	November 1, 2020	4,958.00
Statement No 21508313	December 11, 2020	41,128.00
Statement No 21550I 55	January 1I, 2028	41,858.00
Statement No 215BB2BB	February 13, 2028	4,958.00
Statement No 21BI538O	March 10, 2028	40,800.00
Statement No 21B8252B	April 28, 2028	42,599.08
Statement No 21B5808O	May 21, 2028	41,903.85
Statement No 21902B90	June 20, 2028	48,000.00
Statement No 21925193	July 22, 2028	42,310.00
Statement No 21900B8O	August 12, 2028	41,930.51
Statement No 21959550	September 22, 2028	4,958.00
Statement No 22010I 05	October 22, 2028	4,958.00
Statement No 220232I 1	November 5, 2028	42,500.00
Statement No 220802B9	December 8, 2028	41,000.00
Statement No 220B500I	January 20, 2021	43,058.00

Total Accounts Receivable Balance:

\$130,818.15

David Gersten Special Magistrate
:DRGE6 SP 1299I 20
:nvoice No.R2211809B

February 15, 2021
Page 0

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GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

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Tax ID: 94-1617026

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

February 15, 2021
:DRGE6 SP 1299120
:nvoice No. 2211809B
Gersten, David M.

6 ERWaptiste v. New \$ orld Condominium

BILLING SUMMARY THROUGH January 31, 2026

Fees For Professional ServicesR	41,858.00
Expenses and AdvancesR	<u>0.00</u>

Current Bill: **\$1,875.00**

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank NameR Wells Fargo Bank, N.A..
Bank AddressR 200 Montgomery Street, San Francisco, CA 94100
Beneficiary AccountR Gordon Rees Scully Mansukhani, LLP
Account NumberR 130111B098
AWA Number (ACH)R 121002B2
Federal Tax ID:DR 90-1115021

Domestic and International fund transfer processR
AWA Number (\$ires)R 1210002CB
Swift codeR Domestic – 1210002CB
International – \$ FWUSIS
ReferenceR 2211809B

LOCKBOX ADDRESS FOR CHECKS

Lockbox Services Box #R 39928B
3000 Flair Drive
El Monte, CA 91531-2B23

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

INVOICE

Invoice # 26609
 Date: 01/31/2026

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
11/03/2025	Email regarding requested extension in Hiscox case.	PFV	0.10	\$550.00	\$55.00
11/03/2025	Email regarding revised listing agreement.	PFV	0.20	\$550.00	\$110.00
11/04/2025	Prepare for and attend hearing on Tenth Status Report and Motion for Extension of Time to Serve St. Germain.	KP	1.50	\$450.00	\$675.00
11/04/2025	Review proposed submission on extension of time and draft update email to Receiver in Hiscox case.	PFV	0.10	\$550.00	\$55.00
11/04/2025	Email with probate counsel regarding status of St. Germain case.	PFV	0.10	\$550.00	\$55.00
11/06/2025	Review proposed order on fee application.	PFV	0.20	\$550.00	\$110.00
11/06/2025	Email to probate counsel regarding billing.	PFV	0.10	\$550.00	\$55.00
11/06/2025	Strategize regarding submitting proposed order on fee application continued hearing and status conference on Motion to Extend Time to Serve St. Germain with process.	KP	0.50	\$450.00	\$225.00
11/06/2025	(No charge) Work on proposed order on 10th fee application (.3); review and analyze court file regarding hearing on motion for extension of time	rs	0.60	\$0.00	\$0.00

	to serve estate of St. Germain and status conference (.3).				
11/07/2025	Strategize regarding briefing on motion for extension of time to serve St. Germain for special set hearing on motion.	KP	0.30	\$450.00	\$135.00
11/07/2025	Strategize regarding issues pertaining to serving process on St. Germain, obtaining death certificate, and appointing a personal representative in the probate estate all to move forward with the Partition Action.	KP	0.50	\$450.00	\$225.00
11/07/2025	Email with probate counsel regarding status and planning.	PFV	0.20	\$550.00	\$110.00
11/07/2025	Email with counsel for Ms. Pierre regarding request for deed.	PFV	0.20	\$550.00	\$110.00
11/08/2025	Review statute regarding service of process as to in rem actions.	PFV	0.30	\$550.00	\$165.00
11/08/2025	Email regarding status and planning as to St. Germain service of process.	PFV	0.10	\$550.00	\$55.00
11/09/2025	Email with broker regarding status.	PFV	0.10	\$550.00	\$55.00
11/11/2025	Review order approving fee app (.1); and prepare status report to Receiver (.1).	PFV	0.20	\$550.00	\$110.00
11/11/2025	Email regarding posting appraisal.	PFV	0.10	\$550.00	\$55.00
11/11/2025	Email regarding sale process.	PFV	0.10	\$550.00	\$55.00
11/13/2025	Review scheduling order in Eliteway case.	PFV	0.20	\$550.00	\$110.00
11/14/2025	Strategize regarding motion to agree be bound by any judgment the court enters in the Hiscox declaratory judgment action.	KP	0.50	\$450.00	\$225.00
11/14/2025	Analyze court orders and notices of hearing in the New World Partition case and strategize regarding executive style status report for court regarding motion for extension of time to serve process on Mr. St. Germain.	KP	0.50	\$450.00	\$225.00
11/14/2025	Email with Receiver regarding status of partition case.	PFV	0.10	\$550.00	\$55.00
11/14/2025	Email regarding preparation of summary for Partition case.	PFV	0.20	\$550.00	\$110.00
11/14/2025	Work on motion for entry of final judgment as to Receiver.	PFV	0.60	\$550.00	\$330.00
11/14/2025	Conference regarding status and planning.	PFV	0.40	\$550.00	\$220.00
11/17/2025	Email with probate counsel regarding status.	PFV	0.20	\$550.00	\$110.00

11/18/2025	Strategize regarding supplemental brief for motion to extend time to serve St. Germain and communications with counsel for related party to determine whether they can assist with securing service of process.	KP	0.50	\$450.00	\$225.00
11/18/2025	Research whether appointment of a personal representative and substitution of that personal representative is necessary if a party in litigation dies before the final judgment is entered.	KP	0.70	\$450.00	\$315.00
11/18/2025	Strategize regarding calendaring the deadline for the supplemental brief in support of motion to extend time to serve Mr. St. Germain.	KP	0.30	\$450.00	\$135.00
11/20/2025	Analyze research regarding legal standard for granting an extension of time to serve a party that is in a foreign jurisdiction and analogous case law for inclusion in supplemental brief for motion for extension of time to serve St. Germain.	KP	1.50	\$450.00	\$675.00
11/20/2025	Conference regarding background regarding status report.	PFV	0.40	\$550.00	\$220.00
11/21/2025	Strategize regarding arguments to make in supplemental brief in support of motion for extension of time to serve Mr. St. Germain; analyze "wild deed" and list of parties served for inclusion in supplemental brief.	KP	0.50	\$450.00	\$225.00
11/21/2025	Continue analyzing research for and drafting supplemental brief in support of motion to extend time to serve Mr. St. Germain and begin drafting declarations for Attorneys Zelman and O'Connor.	KP	4.00	\$450.00	\$1,800.00
11/21/2025	Email regarding status report to Judge Eig.	PFV	0.10	\$550.00	\$55.00
11/21/2025	Prepare for and attend conference with unit owners.	PFV	1.00	\$550.00	\$550.00
11/24/2025	Analyze issues regarding progress with title company allowing service by St. Germain by publication and service of last know heir (his daughter) and dismissal of probate action all for inclusion in status report for Court regarding motion for extension of time to serve St. Germain.	KP	0.50	\$450.00	\$225.00
11/24/2025	Call with real estate lawyer and title insurance representative.	PFV	0.30	\$550.00	\$165.00
11/24/2025	Draft status and planning reports and instructions regarding St. Germain issue.	PFV	0.20	\$550.00	\$110.00
11/25/2025	Continue researching for and draft supplemental brief in support of motion to extend time to serve St. Germain and Attorneys' Zelman and O'Connor Declarations.	KP	3.50	\$450.00	\$1,575.00

11/26/2025	Strategize regarding and revise supplemental brief in support of motion for extension of time to service St. Germain and supporting declarations of Attorneys Zelman and O'Connor.	KP	1.00	\$450.00	\$450.00
11/26/2025	Work on memorandum and supplemental motion in support of motion to extend time.	PFV	2.70	\$550.00	\$1,485.00
11/26/2025	Work on affidavit of R. Zelman.	PFV	0.30	\$550.00	\$165.00
11/26/2025	Work on Affidavit of Gia O'Connor.	PFV	0.30	\$550.00	\$165.00
11/26/2025	Email with Receiver regarding supplemental motion.	PFV	0.20	\$550.00	\$110.00
11/26/2025	Email with probate counsel regarding voluntary dismissal of St. Germain case.	PFV	0.10	\$550.00	\$55.00
11/28/2025	Email regarding Legaurre estate.	PFV	0.30	\$550.00	\$165.00
12/01/2025	Revise, finalize, and coordinate filing supplemental brief with supporting declarations from real estate attorney and probate attorney relating to motion to extend time to serve Mr. St. Germain.	KP	1.50	\$450.00	\$675.00
12/01/2025	(No charge) Analyze communications from real estate counsel regarding issues pertaining to estate of Leguerre.	KP	0.50	\$0.00	\$0.00
12/01/2025	Work on supplemental motion regarding service of process and related declarations.	PFV	0.50	\$550.00	\$275.00
12/01/2025	Email regarding Leguerre issues.	PFV	0.10	\$550.00	\$55.00
12/01/2025	(No charge) Work on supplemental motion and brief in support of motion for extension of time to serve St. Germain.	rs	0.80	\$0.00	\$0.00
12/02/2025	Conference with broker regarding offer and marketing strategy regarding sale of property.	PFV	0.40	\$550.00	\$220.00
12/02/2025	Email regarding corrected supplemental brief.	PFV	0.10	\$550.00	\$55.00
12/02/2025	Review offer.	PFV	0.20	\$550.00	\$110.00
12/02/2025	Draft status report regarding offer.	PFV	0.20	\$550.00	\$110.00
12/02/2025	Email with broker regarding offer.	PFV	0.10	\$550.00	\$55.00
12/02/2025	Prepare status report to Receiver/Special Magistrate.	PFV	0.20	\$550.00	\$110.00
12/02/2025	Work on corrected supplemental motion and brief in support of motion for extension of time to serve St. Germain (.6); draft notice of filing declaration of R. Zelman (.3); draft notice of filing declaration of G. O'Connor (.3).	rs	1.20	\$100.00	\$120.00

12/03/2025	Confer with Receiver/Special Magistrate and broker regarding marketing update.	PFV	0.60	\$550.00	\$330.00
12/03/2025	Email with real estate counsel regarding the Leguerre property.	PFV	0.10	\$550.00	\$55.00
12/03/2025	(No charge) Review additional notices of appearance.	PFV	0.20	\$0.00	\$0.00
12/03/2025	Email regarding Hernandez property.	PFV	0.20	\$550.00	\$110.00
12/03/2025	Review and analyze amended complaint as to Leguerre (.4); email to R. Zelman regarding same (.2).	rs	0.60	\$100.00	\$60.00
12/04/2025	Review email regarding update as to Leguerre estate.	PFV	0.10	\$550.00	\$55.00
12/04/2025	Review status report regarding contact with Leguerre family.	PFV	0.10	\$550.00	\$55.00
12/04/2025	Work on response to owner email regarding renter case.	PFV	0.30	\$550.00	\$165.00
12/04/2025	Review marketing report (.1); and provide update email to Receiver regarding same (.1).	PFV	0.20	\$550.00	\$110.00
12/05/2025	Emails regarding Dec action strategy.	MME	0.40	\$550.00	\$220.00
12/08/2025	Prepare for (.2); and attend (.3); hearing on motion for extension of time to serve Mr. St. Germain.	PFV	0.50	\$550.00	\$275.00
12/08/2025	Confer with K. Pearson regarding status and planning.	PFV	0.10	\$550.00	\$55.00
12/08/2025	Email to paralegal regarding preparation of form of order on motion.	PFV	0.10	\$550.00	\$55.00
12/08/2025	Conference and email with paralegal regarding service by publication.	PFV	0.10	\$550.00	\$55.00
12/08/2025	Review proposed order on motion to extend time.	PFV	0.10	\$550.00	\$55.00
12/08/2025	Review Fowler White bill and draft email regarding same.	PFV	0.10	\$550.00	\$55.00
12/08/2025	Review and analyze file regarding heir of St. Germain (.3); email to process server regarding service on same (.3); draft proposed order on motion for extension of time to serve St. Germain (.5).	rs	1.10	\$100.00	\$110.00
12/09/2025	Email with Receiver regarding status of marketing efforts.	PFV	0.10	\$550.00	\$55.00
12/09/2025	Email with broker regarding status of marketing efforts.	PFV	0.10	\$550.00	\$55.00

12/09/2025	Review order on service of process upon Mr. St. Germain.	PFV	0.10	\$550.00	\$55.00
12/10/2025	(No charge) Strategize regarding invoices and reports necessary for 11th Status Report and Fee Application and Proposed Order.	KP	0.50	\$0.00	\$0.00
12/10/2025	Review email regarding service by publication and draft email regarding same.	PFV	0.20	\$550.00	\$110.00
12/10/2025	Email from broker regarding status and planning.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Email regarding survey and review file regarding update appraisal.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Email to broker regarding next steps.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Email with broker regarding development parameters.	PFV	0.30	\$550.00	\$165.00
12/10/2025	Email with Receiver regarding auction qualification status.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Work on property analysis regarding efforts to increase amount of offers.	PFV	1.20	\$550.00	\$660.00
12/10/2025	Email regarding affidavit of diligence regarding Mr. St. Germain.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Review broker report regarding offer.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Draft follow up email with broker regarding density.	PFV	0.10	\$550.00	\$55.00
12/10/2025	Review and analyze file regarding publications made for Defendants which Receiver was unable to effectuate service of process (.6); legal research regarding effectuating service by publication (.5); draft notice of action as to St. Germain (.5); email to New Times regarding same (.3); email to A. Porosoff regarding survey (.3).	rs	2.20	\$100.00	\$220.00
12/11/2025	Conference regarding service by publication.	PFV	0.30	\$550.00	\$165.00
12/11/2025	(No charge) Work on Receiver's 11th report and fee application (.3); email to process server regarding affidavits of due diligence (.5).	rs	0.80	\$0.00	\$0.00
12/12/2025	Draft 11th Status Report and Fee Application and Propose Order for Receivership Case.	KP	1.50	\$450.00	\$675.00
12/12/2025	Work on service by publication as to St. Germain.	PFV	0.50	\$550.00	\$275.00
12/14/2025	Email with broker regarding possible auction terms.	PFV	0.30	\$550.00	\$165.00
12/14/2025	Conference with broker regarding possible auction terms.	PFV	0.20	\$550.00	\$110.00

12/14/2025	Email with Special Magistrate regarding possible auction terms and possible environmental study.	PFV	0.40	\$550.00	\$220.00
12/15/2025	Revisions to 11th Status Report and Fee Application and Proposed Order.	KP	0.50	\$450.00	\$225.00
12/15/2025	Work on 11th status report (.8); and proposed order (.2).	PFV	1.00	\$550.00	\$550.00
12/15/2025	Confer with broker and auctioneer and client regarding issues relating to sale of property.	PFV	1.40	\$550.00	\$770.00
12/15/2025	Additional conference with the broker regarding sale price reduction.	PFV	0.50	\$550.00	\$275.00
12/15/2025	Telephone conference with Clerk regarding notices of action (.3); raft template of affidavit of due diligence as to non-served Defendants (.5); work on template of notice of action for same (.5).	rs	1.30	\$100.00	\$130.00
12/16/2025	Work on notices of action and affidavits of service.	PFV	0.50	\$550.00	\$275.00
12/16/2025	Work on service by publication documents.	PFV	0.20	\$550.00	\$110.00
12/17/2025	Email regarding marketing update.	PFV	0.20	\$550.00	\$110.00
12/18/2025	Work on property sale.	MME	0.50	\$550.00	\$275.00
12/23/2025	Review file regarding service notice of action.	PFV	0.10	\$550.00	\$55.00
12/30/2025	Review service by publication notice.	PFV	0.10	\$550.00	\$55.00
12/30/2025	Receipt and review of notices of action issued by clerk (.5); telephone conference with clerk regarding Community News (.3).	rs	0.80	\$100.00	\$80.00
12/31/2025	Review email regarding Leguarre estate.	PFV	0.10	\$550.00	\$55.00
12/31/2025	Telephone conference with Community News regarding publication of notices of action (.5); emails to and from Community News (.3).	rs	0.80	\$100.00	\$80.00
01/05/2026	Review homeowner request for status of sale efforts and draft response.	PFV	0.20	\$550.00	\$110.00
01/06/2026	Confer with counsel for lender regarding unit 218/219.	PFV	0.40	\$550.00	\$220.00
01/06/2026	Research regarding unit title and title related issues.	PFV	0.40	\$550.00	\$220.00
01/07/2026	Analyze Third District Court of Appeal opinion affirming court's denial of Renter's motion to intervene in partition action and strategize regarding impact on case and sale process.	KP	0.50	\$450.00	\$225.00
01/07/2026	Review appellate opinion regarding affirmance of	PFV	0.40	\$550.00	\$220.00

	order denying renter party intervention.				
01/07/2026	Draft status report to client regarding appeal outcome.	PFV	0.10	\$550.00	\$55.00
01/07/2026	Review proposed order on motion to withdrawal in Hiscox matter.	PFV	0.10	\$550.00	\$55.00
01/07/2026	Review order on withdraw of owners counsel.	PFV	0.10	\$550.00	\$55.00
01/07/2026	Draft status report regarding Hiscox matter.	PFV	0.10	\$550.00	\$55.00
01/08/2026	Emails regarding potential sale of property.	MME	0.40	\$550.00	\$220.00
01/08/2026	Email regarding motion to withdraw in Hiscox case.	PFV	0.10	\$550.00	\$55.00
01/12/2026	Emails from and to process server regarding service on St. Germain's daughter	rs	0.20	\$100.00	\$20.00
01/13/2026	Telephone call with potential purchaser.	MME	0.30	\$550.00	\$165.00
01/15/2026	Telephone calls and emails with potential purchaser.	MME	0.70	\$550.00	\$385.00
01/15/2026	Review file regarding survey and title commitment.	rs	0.40	\$100.00	\$40.00
01/15/2026	Review email regarding property information request.	PFV	0.10	\$550.00	\$55.00
01/15/2026	Draft email regarding survey and property background information regarding potential purchaser.	PFV	0.30	\$550.00	\$165.00
01/15/2026	Review new LOI and draft status update to Receiver.	PFV	0.20	\$550.00	\$110.00
01/17/2026	Confer with broker regarding status and recent offers.	PFV	0.60	\$550.00	\$330.00
01/21/2026	Reviewing offer.	MME	0.20	\$550.00	\$110.00
01/26/2026	Email regarding publication notices.	PFV	0.20	\$550.00	\$110.00
01/26/2026	Review notice of application for tax deed.	PFV	0.10	\$550.00	\$55.00
01/26/2026	Draft status report to Receiver.	PFV	0.10	\$550.00	\$55.00
01/26/2026	Email with receiver regarding potential purchaser.	PFV	0.20	\$550.00	\$110.00
01/27/2026	Working on pricing issue.	MME	0.50	\$550.00	\$275.00
01/27/2026	Draft notice of filing affidavits of publication.	rs	0.30	\$100.00	\$30.00
01/27/2026	Conference regarding service of process issues.	PFV	0.20	\$550.00	\$110.00
01/27/2026	Review deeds regarding deceased unit owner.	PFV	0.20	\$550.00	\$110.00

01/27/2026	Confer with real estate counsel regarding deceased unit owner.	PFV	0.50	\$550.00	\$275.00
01/27/2026	Review mandate regarding appeal in partition action.	PFV	0.10	\$550.00	\$55.00
01/27/2026	Review notice of filing affidavits of service.	PFV	0.20	\$550.00	\$110.00
01/27/2026	Email with counsel in class action case regarding tax deed.	PFV	0.10	\$550.00	\$55.00
01/27/2026	Email regarding unit density.	PFV	0.10	\$550.00	\$55.00
01/29/2026	Telephone call with potential buyer.	MME	0.40	\$550.00	\$220.00
01/29/2026	(No charge) Draft notice of filing return of service on Mr. St. Germain's daughter.	rs	0.20	\$0.00	\$0.00
01/30/2026	Reviewing pricing issues and outstanding debt and call with Receiver regarding status and strategy.	MME	0.50	\$550.00	\$275.00
01/30/2026	Conference with real estate counsel regarding title issues.	PFV	0.20	\$550.00	\$110.00
01/30/2026	Email regarding mediation in Hiscox case.	PFV	0.10	\$550.00	\$55.00
01/30/2026	Conference with Receiver regarding offers for sale and responses.	PFV	0.50	\$550.00	\$275.00
01/30/2026	Email to City Attorney regarding inquiry concerning potential sale to the City.	PFV	0.10	\$550.00	\$55.00
				Hours Subtotal	65.3
				Fees Subtotal	\$27,900.00

Expenses

Type	Date	Description	Quantity	Rate	Amount
Expense	11/25/2025	Webmaster. Invoice 1318973. Shared Hosting - Starter Hosting (newworldcondoreceivership.com) Dec 2025 - Jan 2026.	1.00	\$12.95	\$12.95
Expense	11/30/2025	Pacer/Court Documents	1.00	\$4.30	\$4.30
Expense	11/30/2025	Lexis Nexis Research Fee	1.00	\$14.47	\$14.47
Expense	12/01/2025	Interest on loan	1.00	\$1,061.79	\$1,061.79
Expense	12/08/2025	DLE Court Reporter. Invoice 34551. Hearing appearance Judge Spencer Eig. David M. Gerstein v. Volrick Wallace Higgs. 12.8.25	1.00	\$100.00	\$100.00
Expense	12/16/2025	OTR Legal Process. Invoice 2026000004.	1.00	\$290.00	\$290.00

Updated Skip Trace and Affidavit Due Diligent for Jean Yvon St. German. 12.16.25					
Expense	12/19/2025	Postage	7.00	\$4.71	\$32.97
Expense	12/19/2025	OTR Legal. Invoice 2026000005. Courier Services File Notices of Action Miami Dade Clerk R/T. 12.19.25	1.00	\$165.00	\$165.00
Expense	12/23/2025	OTR Legal. Invoice 2026000006. Courier Services File Notices of Action Miami Dade Clerk R/T. 12.23.25	1.00	\$130.00	\$130.00
Expense	12/25/2025	Webmaster. Invoice 1373328. Shared Hosting-Starter Hosting (newworldcondoreceivership.com) Jan 1st-Feb 1st, 2026.	1.00	\$12.95	\$12.95
Expense	12/29/2025	OTR Legal. Invoice 2026000007. Courier Services File Notices of Action Miami Dade Clerk R/T. 12.29.25	1.00	\$155.00	\$155.00
Expense	12/31/2025	Lexis Nexis Research Fee	1.00	\$27.22	\$27.22
Expense	12/31/2025	Pacer/Court Documents	1.00	\$4.90	\$4.90
Expense	12/31/2025	Photocopies	607.00	\$0.25	\$151.75
Expense	01/01/2026	Interest on loan	1.00	\$1,203.33	\$1,203.33
Expense	01/13/2026	Work on reconciliation of bank accounts and preparation for Receiver's status report and prepare records for 2025 1099s and tax return.	1.00	\$0.50	\$0.50
Expense	01/21/2026	OTR Legal Process. Invoice 2026000106. Rush, service amended complaint to be served on Marie St. German. additional attempts. 01.21.26	1.00	\$202.00	\$202.00
Expense	01/25/2026	Webmaster - Invoice 1433563. Shared Hosting-Starter Hosting (newworldcondoreceivership.com) Feb 1-March 1.2026	1.00	\$12.95	\$12.95
Expense	01/29/2026	Postage	3.00	\$0.74	\$2.22
Expense	01/31/2026	Pacer/Court Documents	1.00	\$4.20	\$4.20
Expense	01/31/2026	Photocopies	15.00	\$0.25	\$3.75
Expenses Subtotal					\$3,592.25

Name	Hours	Rate	Amount
Melanie Damian	3.9	\$550.00	\$2,145.00
Kristopher Pearson	20.3	\$450.00	\$9,135.00
Kristopher Pearson	1.0	\$0.00	\$0.00

Peter Valori	28.6	\$550.00	\$15,730.00
Peter Valori	0.2	\$0.00	\$0.00
Reesea Saetae	8.9	\$100.00	\$890.00
Reesea Saetae	2.4	\$0.00	\$0.00
Hours Total			65.3
Subtotal			\$31,492.25
Amount			\$31,492.25

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Due
(\$790,944.11	+ \$31,492.25)- (\$0.00) = \$822,436.36

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
63	12/31/2023	\$267,345.48	\$0.00	\$267,345.48
242	01/31/2024	\$28,262.38	\$0.00	\$28,262.38
948	04/30/2024	\$34,339.34	\$0.00	\$34,339.34
949	07/31/2024	\$172,856.92	\$0.00	\$172,856.92
1333	10/31/2024	\$61,583.73	\$0.00	\$61,583.73
1734	01/31/2025	\$24,051.98	\$0.00	\$24,051.98
2134	04/30/2025	\$86,544.02	\$0.00	\$86,544.02
2482	07/31/2025	\$73,940.36	\$0.00	\$73,940.36
26149	10/31/2025	\$42,019.90	\$0.00	\$42,019.90

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
26609	01/31/2026	\$31,492.25	\$0.00	\$31,492.25

Outstanding Balance	\$822,436.36
Total Amount Due	\$822,436.36

Please make all amounts payable to: Damian Valori Culmo

Please call 305-371-3960 for questions.

Payment is due upon receipt.

**COMPOSITE
EXHIBIT 3**

Sacher Zelman Hartman, P.A.
Two Datran Center, Suite 1209
9130 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 371-8797
E-mail: info@sacherzelman.com
ID#: 65-0212052

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

November 25, 2025
Invoice Number 113864

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

PROFFESIONAL SERVICES

			Hours
10/28/25	RMZ	Telephone call with Roy Hartman regarding service on Leguerre; review correspondence from Roy.	0.30
10/28/25	RMH	Call from RMZ re service upon Unit 236 - Vandelyn Novilist Leguerre - Deceased, review docket entries, email to RMZ re same	0.50
11/20/25	RMZ	Telephone call with Peter Valori; calls to Brian Stringer of the Fund.	0.20
11/21/25	RMZ	Telephone call with Brian Stringer, Esq; correspondence with Brian and Peter Valori, Esq.	0.40
11/24/25	RMZ	Telephone call with Brian Stringer, Esq. of the Fund with Peter Valori, Esq.	0.50

Invoice 113864

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

TOTAL HOURS AND FEES 1.90 940.50

TOTAL STATEMENT 940.50

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	1.40	693.00
Roy M. Hartman	0.50	247.50
Total Fees	1.90	940.50

10/25/25	PREVIOUS BALANCE	30,001.52
	Total this Bill	940.50
	<u>NEW BALANCE</u>	<u>30,942.02</u>

Accounts Receivable Aging

Current	940.50
30 Days	198.00
60 Days	841.50
90 Days	3,147.00
120 Days	25,815.02

Sacher Zelman Hartman, P.A.
Two Datran Center, Suite 1209
9130 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 371-8797
E-mail: info@sacherzelman.com
ID#: 65-0212052

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

December 25, 2025
Invoice Number 113888

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

PROFFESIONAL SERVICES

			Hours	
12/01/25	RMZ	Review correspondence from Peter Valori; telephone call with Iris Castillo; prepare correspondence to Peter Valori.	0.30	
12/02/25	RMZ	Review Motion papers and supporting Affidavit regarding Unit 234; prepare correspondence regarding DeGuerre.	0.30	
12/04/25	RMZ	Review correspondence from Gabriela regarding Unit 236.	2.00	
		TOTAL HOURS AND FEES	2.60	1,287.00
		TOTAL STATEMENT		1,287.00

Invoice 113888

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

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	2.60	1,287.00
Total Fees	2.60	1,287.00

11/25/25	PREVIOUS BALANCE	30,942.02
	Total this Bill	1,287.00
	<u>NEW BALANCE</u>	<u>32,229.02</u>

Accounts Receivable Aging

Current	1,287.00
30 Days	940.50
60 Days	198.00
90 Days	841.50
120 Days	28,962.02

Sacher Zelman Hartman, P.A.
Two Datran Center, Suite 1209
9130 South Dadeland Boulevard
Miami, Florida 33156
Telephone: (305) 371-8797
E-mail: info@sacherzelman.com
ID#: 65-0212052

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

January 25, 2026
Invoice Number 113912

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

TOTAL STATEMENT 0.00

12/25/25	PREVIOUS BALANCE	32,229.02
	Total this Bill	0.00
	<u>NEW BALANCE</u>	<u>32,229.02</u>

Accounts Receivable Aging

Current	0.00
30 Days	1,287.00
60 Days	940.50
90 Days	198.00
120 Days	29,803.52

Honorable David Gersten (Ret.), as Receiver
1000 Brickell Avenue
Suite 1020
Attn: Peter Valori
Miami, FL 33131

December 8, 2025
Page 1

Ref: GAO-31536-114478-660890

Estate of Jean Yvon St. Germain

INVOICE	
Total Amount Due for this Invoice	\$ 1,417.50
Total Due.....	\$ 1,417.50

For Professional Services Through November 30, 2025

Date	Description	Atty	Hours
11/07/25	Communicate with E. Laguerre regarding status of investigating information needed to obtain death certificate from consulate.	GAO	0.40
11/07/25	Communicate with P. Valori regarding status of obtaining death certificate.	GAO	0.20
11/14/25	Review Order setting status hearing.	GAO	0.10
11/17/25	Communicate with P. Valori and E. Laguerre regarding status hearing.	GAO	0.10
11/18/25	Communicate with P. Valori and E. Laguerre regarding matter status and next steps.	GAO	0.30
11/18/25	Communicate with P. Valori regarding follow up with Francilia Pierre Louis' counsel on death certificate for decedent.	GAO	0.10
11/24/25	Communicate with P. Valori and D. Gersten regarding strategy in light of inability to obtain death certificate for decedent to progress estate and to discuss dismissal of case.	GAO	0.40
11/25/25	Communicate with regarding status conference hearing and voluntary dismissal of Petition.	GAO	0.20
11/26/25	Prepare Notice of Voluntary Dismissal.	GAO	0.20
11/26/25	Communicate with client regarding Notice of Voluntary Dismissal.	GAO	0.10
Fees for Professional Services			\$ 1,417.50

Summary of Timekeeper Fees

Timekeeper	Hours	Rate/Hour	Dollars
Giovanna Abreu O'Connor (GAO)	2.10	675.00	1,417.50
TOTAL	2.10	\$	1,417.50

Totals for This Matter

Fees for Professional Services	\$	1,417.50
Reimbursable Costs	\$	0.00
NET CURRENT BILLING FOR THIS MATTER	\$	<u>1,417.50</u>
TOTAL AMOUNT DUE FOR THIS INVOICE	\$	<u><u>1,417.50</u></u>

TERM: DUE UPON RECEIPT

Please make checks payable to: **FOWLER WHITE BURNETT IN U.S. CURRENCY**
Please reference 31536-114478-660890 when making payment

Honorable David Gersten (Ret.), as Receiver
 1000 Brickell Avenue
 Suite 1020
 Attn: Peter Valori
 Miami, FL 33131

January 13, 2026
 Page 1

Ref: GAO-31536-114478-661630

Estate of Jean Yvon St. Germain

INVOICE	
Total Amount Due for this Invoice	\$ 675.00
Total Due.....	\$ 675.00

For Professional Services Through December 31, 2025

Date	Description	Atty	Hours
12/01/25	Review Order of Dismissal.	GAO	0.10
12/01/25	Communicate with P. Valori and K. Pearson regarding Affidavit and Supplemental Motion for Extension of Time to Serve Personal Representative Regarding Estate of Jean Yvon St. Germain	GAO	0.30
12/01/25	Review and revise Affidavit and Supplemental Motion for Extension of Time to Serve Personal Representative Regarding Estate of Jean Yvon St. Germain	GAO	0.50
12/02/25	Review notice from Court regarding status conference.	GAO	0.10
Fees for Professional Services			\$ 675.00

Summary of Timekeeper Fees

Timekeeper	Hours	Rate/Hour	Dollars
Giovanna Abreu O'Connor (GAO)	1.00	675.00	675.00
TOTAL	1.00	\$	675.00

Totals for This Matter

Fees for Professional Services	\$ 675.00
Reimbursable Costs	\$ 0.00
NET CURRENT BILLING FOR THIS MATTER	\$ 675.00
TOTAL AMOUNT DUE FOR THIS INVOICE.....	\$ 675.00

TERM: DUE UPON RECEIPT

Please make checks payable to: **FOWLER WHITE BURNETT IN U.S. CURRENCY**
 Please reference 31536-114478-661630 when making payment

JACQUELINE D. GREENBERG, CPA, LLC

March 9, 2026

Hon. David M. Gersten, Receiver
 c/o Mary Dhanji
 Damiam & Valori
 100 Brickell Ave, Suite 1020
 Miami, Florida 33131

File: NW/04

For Professional Services Rendered Re: New World Condominium Apts. Condo Assn.

<u>DATE</u>		<u>TIME</u>
01/23/26	Forms-1099-NEC - prepare, e-file; send copies to client Analyze 2025 receipts and expenses of the receivership for Form 1120-H, U.S. Income Tax Returns for Homeowner	0.80
01/28/26	Associations	0.75
02/07/26	Preparation of Form 1120-H, including instructions for filing	0.90
	Hours	2.45
	Subtotal	\$612.50
01/22/26	E-Filing fees - efile4biz to prepare and transmit Forms 1099-NEC FedEx paid - mailing the 2025 Forms 1099-NEC to Damian	10.20
01/28/26	Valori	46.25
	Invoice Total	\$668.95



1833 NE 123rd St
North Miami, FL 33181-2805
305.899.9337

January 28, 2026 4:26 PM
Receipt #: TMBK00724519

FedEx Express \$46.25
FedEx Priority Overnight
888289455968

Recipient Address

NEW WORLD CONDOMINIUM APTS
DAMIAN VALORI
1000 Brickell Ave
SUITE 1020
MIAMI, FL 33131, US
305-812-8766

Scheduled Delivery Date: 01/29/2026

Pricing Option: One Rate

Package Information: FedEx Envelope

Additional Services:

No Signature Required

FEDEX_ONE_RATE

Package Weight: .10 lb (S)

Declared Value: \$100

Express Subtotal	\$46.25
Tax	\$0.00
Total	\$46.25

***** PURCHASE *****
APPROVED

Total: \$46.25

E-File

3300 Gateway Drive
Pompano Beach, FL 33069
United States
Email: support@efile1.zendesk.com

Invoice

Invoice # 2080748
Billed On Jan 22, 2026
Terms On-Receipt
Due On Jan 22, 2026

Bill To

JACQUELINE GREENBERG
JACQUELINE D GREENBERG, CPA, LLC
11113 BISCAYNE BLVD #352
MIAMI, FL 33181
United States

PAID

on Jan 22, 2026

\$10.20 USD

Date	Description	Qty	Price	Subtotal
Jan 22, 2026	E-File Only 1099 & W2	3	\$3.40	\$10.20
Subtotal				\$10.20
Total				\$10.20
Paid				(\$10.20)
Amount Due				\$0.00

Payments

Jan 22, 2026 \$10.20 Payment from MasterCard ... 7282

Notes

Efile4biz

All amounts in United States Dollars (USD)

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.

_____/

**ORDER GRANTING RECEIVER’S APPLICATION
FOR ORDER AUTHORIZING PAYMENT OF FEES AND
EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE FUNDS [D.E.]**

This matter came before the Court for hearing on _____, 2026 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 [D.E. ___] (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 amount of \$6,375.00 and costs in the amount of \$0, for a total of \$6,375.00 for the period from November 1, 2025 through January 31, 2026;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver, incurred fees in the amount of \$27,900.00 and costs in the amount of \$31,492.25, for a total of \$59,392.25 for the period from November 1, 2025 through January 31, 2026;

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver, incurred fees in the amount of \$2,227.50 for the period from November 1, 2025 through January 31, 2026;

(d) Fowler White Burnett, as Probate Counsel, incurred fees in the amount of \$2,092.50 and costs in the amount of \$0, for a total of \$2,092.50 for the period from November 1, 2025 through January 31, 2026.

(e) Jacqueline Greenberg, as CPA, incurred fees in the amount of \$612.50 and costs in the amount of \$56.45, for a total of \$668.95 for work performed in January 2026 related to the 2025 tax matters.

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)-(e), *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 _____, 2026.

CIRCUIT COURT JUDGE

Copies to all Counsel of Record