

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 THIRTEENTH 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 thirteenth 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], Eleventh Report [D.E. 76], and Twelfth Report [D.E. 82] 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, 82], 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 June 5, 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], February 19, 2026 [D.E. 80], April 10, 2026 [D.E.87]. 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 \$240,000 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 March 20, 2026 at 4:00 p.m., with the next meeting scheduled for June 10, 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, 82], 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, 82], 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

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.

Receiver, through Lead Counsel, filed claims for declaratory judgment as to the dissolution and for partition of the condominium property as referenced *infra*.

F. Demolition.

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

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.

master demolition permit on or about January 26, 2024, and issued and approved the sub-permit for plumbing on or about February 1, 2024.

The demolition commenced on March 20, 2024 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, 82], 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

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).

Action was amended to remove Ms. Whitfield and is now styled as *Eliteway Capital Investments, LLC, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Eliteway Class Action”).

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, 82], 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, 82], one of the unit owners, Valtom, LLC, filed a lawsuit against the Association and its former

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.).

property management company and former board members on April 11, 2023. *See Valtom, LLC v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012984-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Valtom Action”). Valtom, LLC voluntarily dismissed its action without prejudice.

iv. The Forty Year Investment Action.

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51, 53, 56, 57, 61, 71, 76, 82], 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, 82], 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, 82], the Receiver, through Lead Counsel, demanded the roofing companies which were working on the Association's roof at the time of the January 28, 2023 fire remove the mechanic's lien which they filed against the Association on July 7, 2023 (Book 33784, Pages 1200-1201) because such lien was untimely and otherwise deficient. The roofing companies failed to respond to the foregoing demand. As such, the Receiver, through Lead Counsel, served subpoenas duces tecum upon the corporate representatives of the roofing companies, as well as the owners of the roofing companies. The corporate representative of one of the roofing companies, Elite Innovation Construction, Inc., and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), did not appear for their scheduled depositions on November 7, 2023. The corporate representative of the other roofing company, D.J.T.H., LLC, and its owner, Herby Myrtil (a/k/a Herby Myrthil) appeared for their scheduled depositions on November 22, 2023. Following the foregoing events, the Receiver, on behalf of the Association, commenced a separate action against Elite Innovation Construction, Inc. and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), to quiet title and discharge the above-referenced mechanic's lien. Further information concerning that action is set forth *infra*.

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 an insurance policy pertaining to 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 was held on May 1, 2026 and resulted in an impasse.

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, 82], 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.

On April 13, 2026, on motion of the Receiver, the Court entered Final Judgment on all counts of the complaint [D.E. 88].

The Receiver/Special Magistrate for sale of the property is in the process of selling the property (subject to court approval), so that the funds from the sale may be distributed in accordance with the Court’s Final Judgment in the Partition case and the Order Appointing Receiver and further orders of the Court.

⁶ The Receiver seeks a partition of the condominium property, as well as a judicial determination that the Association is terminated pursuant to section 12.8 of the Declaration of Condominium because 70% or more of the unit owners did not agree in writing to repair the condominium property within 60 days of the January 28, 2023 fire, *i.e.*, by March 29, 2023.

ii. The Prestige Action.

As referenced in the prior reports [D.E. 29, 40, 49, 51, 53, 56, 57, 61, 71, 76, 82], the Receiver, through Lead Counsel, sued the Association's former property management company, Prestige Management Solutions, Inc. ("Prestige"), for gross negligence, common law breach of fiduciary duty, and statutory breach of fiduciary duty in the case styled *Gersten v. Prestige Management Solutions, Inc.*, Case No. 2023-019453-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Prestige Action"). In response to the complaint, Prestige moved for a more definite statement.

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, 82] and/or his foregoing Thirteenth 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 February 1, 2026 through April 30, 2026 and Lead Counsel from February 1, 2026 through April 30, 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 February 1, 2026 through April 30, 2026, as well as the Receiver’s reductions thereto.

⁷The 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.

As reflected in **Composite Exhibit 2**, from February 1, 2026 through April 30, 2026, GRSM incurred fees in the total amount of \$5,850.00 and costs in the amount of \$0, for a total amount of \$5,850.00, and from February 1, 2026 through April 30, 2026, Lead Counsel incurred fees in the amount of \$28,127.50 and costs in the amount of \$44,084.01, for a total amount of \$72,211.51.

As reflected in **Composite Exhibit 3**, from February 1, 2026 to January 31, 2026, Special Counsel incurred fees in the amount of \$1,633.50.

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees of Special Counsel from February 1, 2026 through April 30, 2026, in the total amount of \$1,633.50. GRSM seek approval of their fees and costs from February 1, 2026 through April 30, 2026 and Lead Counsel seek approval of their fees and costs from February 1, 2026 through April 30, 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 4**.

CERTIFICATION

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

- (a) I have read this application (the “Application”);
- (b) To the best of my knowledge, information, and belief, formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the exhibits hereto and such fees as reduced by the Receiver are reasonable, necessary and commensurate with the skill and experience required for the activity performed;

- (d) I have not included in the amount for which reimbursement is sought the authorization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for bulk mailing, photocopies, and facsimile transmission);
- (e) In seeking reimbursement for a service which GRSM, Lead Counsel, 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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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Florida Court's e-Filing Portal upon all counsel of record on this 15th day of June 2026.

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

David Gersten, Esq., as Receiver
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 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 6/5/26

		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]	\$ 1,334,647.19	\$ 1,334,647.19	\$ 1,334,647.19
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 460.58	\$ 460.58	\$ 460.58
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available			\$ 1,335,107.77
	(Lines 1-8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 1,325,384.77	\$ 1,325,384.77	\$ 1,325,384.77
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 1,325,384.77
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)			\$ 1,325,384.77
Line 13	Ending Balance (As of June 5, 2026)			\$ 9,723.00
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 9,723.00

[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

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

Date of Check	From	Amount
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
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

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

Date of Check	From	Amount
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
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

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

Date of Check	From	Amount
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
3/10/2026	Maintenance Fee Deposit	\$ 626.68
3/30/2026	Maintenance Fee Deposit	\$ 538.26
4/1/2026	Damian Valori Culmo Loan	\$ 10,000.00
4/14/2026	Maintenance Fee Deposit	\$ 626.68
5/1/2026	DVC loan	\$ 10,000.00
5/4/2026	Maintenance Fee Deposit	\$ 538.26
5/6/2026	Maintenance Fee Deposit	\$ 313.34
6/1/2026	DVC loan	\$ 10,000.00
6/1/2026	Maintenance Fee Deposit	\$ 538.26
6/5/2026	Maintenance Fee Deposit	\$ 313.34
Total		\$ 1,334,647.19

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

**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 Security 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 Security 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
3/9/2026	Las Nueces Landscape & Trimming	\$ 923.16
3/31/2026	Telephone Service	\$ 20.00
4/1/2026	New Wave Loan	\$ 7,788.00
4/30/2026	Telephone Service	\$ 20.00
5/1/2026	New Wave Loan	\$ 7,788.00
5/31/2026	Telephone Service	\$ 20.00
6/1/2026	New Wave Loan	\$ 7,788.00
6/30/2026	Telephone Service	\$ 20.00
GRAND TOTAL OF EXPENSES		\$ 1,325,384.77



GORDON REES SCULLY MANSUKHANI
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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

March 10, 2026
ID: GERSP 1299620
Invoice No. 22141600
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 28, 2026

Fees For Professional Services:	\$1,350.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,350.00

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>
02/02/26	Review emails between city attorney and Peter Valori .1	DMG2	0.10
02/03/26	Review Richard Zelman email with bill attached for review .1	DMG2	0.10
02/05/26	Review Peter Valori email re: case status .1	DMG2	0.10
02/09/26	Review and respond to Peter Valori email re: respond to offer .1	DMG2	0.10
02/10/26	Review and respond to Reesa Saettae email re: meeting .1; review and respond to Peter Valori email re: meeting re: counter offer .1	DMG2	0.20
02/11/26	Zoom conference with Peter Valori re: case update and counter offer .2	DMG2	0.20
02/12/26	Review Peter Valori email re: city attorney response .1	DMG2	0.10
02/13/26	Review and respond to Peter Valori email re: mediation .1	DMG2	0.10
02/18/26	Review and respond to Peter Valori email re: court order re: trial .1	DMG2	0.10
02/19/26	Review court order .1; review and respond to Peter Valori email re: mediation .1	DMG2	0.20
02/23/26	Review Peter Valori email re: city manager .1	DMG2	0.10
02/24/26	Review and respond to Peter Valori email re: offer .1; review and respond to Peter Valori email re: discuss offer strategy and steps going forward .1	DMG2	0.20
02/25/26	Review mail re: conference with Peter Valori, Melanie Damian re: securing offers .1	DMG2	0.10
02/27/26	Review and respond to Peter Valori email re: proposed motion .1	DMG2	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	1.80	1,350.00

TOTAL FOR SERVICES

\$1,350.00

Outstanding Statements as of March 10, 2026

<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
Statement No 22050289	December 5, 2025	\$1,425.00
Statement No 22087840	January 20, 2026	\$3,075.00
Statement No 22115098	February 17, 2026	\$1,875.00

Total Accounts Receivable Balance:

\$132,693.15

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 22141600

March 10, 2026
Page 4



GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

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

March 10, 2026
ID: GERSP 1299620
Invoice No. 22141600
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH February 28, 2026

Fees For Professional Services:	\$1,350.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,350.00

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: 22141600

LOCKBOX ADDRESS FOR CHECKS

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

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

April 21, 2026
ID: GERSP 1299620
Invoice No. 22186174
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2026

Fees For Professional Services:	\$1,800.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$1,800.00

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>
03/02/26	Review and respond to Melanie Damian email re: sales price reduction .1; review and respond to Melanie Damian email re: communicate changes and possible City involvement .1; review Arthur Porosoff email with modified listing agreement attached for review and signing .1	DMG2	0.30
03/04/26	Review CPA/Mary Danghi email re: tax issue .1	DMG2	0.10
03/06/26	Review CPA email re: tax filing .1	DMG2	0.10
03/07/26	Review CPA email with DocuSign document .1	DMG2	0.10
03/09/26	Review CPA email re: tax document .1	DMG2	0.10
03/16/26	Review and edit proposed report and order sent by Reesa Seatae .2	DMG2	0.20
03/19/26	Review and respond to Peter Valori email re: meeting with city .1; review court order .1	DMG2	0.20
03/20/26	Attend owner's meeting .6	DMG2	0.60
03/23/26	Review court order .1; review and respond to Peter Valori email re: strategy re: close out case .1	DMG2	0.20
03/27/26	Review and respond to Peter Valori email re: offer .1; review multiple email(s) re: counter offer .1	DMG2	0.20
03/30/26	Review and edit current draft of motion for final judgment on the pleadings .2	DMG2	0.20
03/31/26	Review and forward to Peter Valori, Maribel Diaz email re: tax .1	DMG2	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	2.40	1,800.00

TOTAL FOR SERVICES

\$1,800.00

Outstanding Statements as of April 21, 2026

<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
Statement No 22050289	December 5, 2025	\$1,425.00
Statement No 22087840	January 20, 2026	\$3,075.00
Statement No 22115098	February 17, 2026	\$1,875.00
Statement No 22141600	March 10, 2026	\$1,350.00

Total Accounts Receivable Balance:

\$134,043.15

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 22186174

April 21, 2026
Page 4



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

April 21, 2026
ID: GERSP 1299620
Invoice No. 22186174
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH March 31, 2026

Fees For Professional Services:	\$1,800.00
Expenses and Advances:	<u>0.00</u>

Current Bill: **\$1,800.00**

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: 22186174

LOCKBOX ADDRESS FOR CHECKS

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

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

May 20, 2026
ID: GERSP 1299620
Invoice No. 22217591
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2026

Fees For Professional Services:	\$2,700.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,700.00

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>
04/01/26	Review Mary Dhanji email re: financials .1; review and respond to Peter Valori email re: analysis of filing motion .1	DMG2	0.20
04/02/26	Review and respond to Peter Valori email re: court filing .1	DMG2	0.10
04/03/26	Review Peter Valori email with motion attached for review/editing and approval .2	DMG2	0.20
04/06/26	Review court filing .1; review Eric Thompson/Ana Sentemat email re: insurance .1	DMG2	0.20
04/07/26	Review Peter Valori/Rick Zelman email re: title question .1; review and respond to Peter Valori email re: court hearing .1; review Eric Thompson/Peter Valori email re: financial information .1; review and respond to Peter Valori email re: final judgment .1; review and respond to Peter Valori email re: tax returns .1; review email from CPA with documents attached .1	DMG2	0.60
04/08/26	Review court order .1; review court filing .1; review Peter Valori/Rick Zelman email re: dismiss .1; review and respond to Peter Valori email re: submit order .1	DMG2	0.40
04/09/26	Review and respond to Ana Sentamat email re: insurance .1	DMG2	0.10
04/10/26	Review Rick Zelman billing .1; review court order .1	DMG2	0.20
04/13/26	Review court order .1; review and respond to Peter Valori email re: discovery .1	DMG2	0.20
04/16/26	Conference with Peter Valori re: upcoming court hearing .1	DMG2	0.10
04/17/26	Attend court hearing re: final judgment and strategic conference with Peter Valori re: sale .5	DMG2	0.50
04/20/26	Review and sign court document .1; review court filing .1	DMG2	0.20
04/22/26	Review court order .1	DMG2	0.10
04/26/26	Review and respond to Peter Valori email re: letter of intent .1; review and respond to Peter Valori email re: goi through broker re: interest in property .1; review Peter Valori/Kimberly McDonough email(s) re: status .1	DMG2	0.30

David Gersten Special Magistrate
ID: GERSP 1299620
Invoice No.: 22217591

May 20, 2026
Page 4

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
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
Statement No 22050289	December 5, 2025	\$1,425.00
Statement No 22087840	January 20, 2026	\$3,075.00
Statement No 22115098	February 17, 2026	\$1,875.00
Statement No 22141600	March 10, 2026	\$1,350.00
Statement No 22186174	April 21, 2026	\$1,800.00
Total Accounts Receivable Balance:		<u><u>\$135,843.15</u></u>



GORDON REES SCULLY MANSUKHANI
YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300
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David Gersten
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100 SE Second St, Suite 3900
Miami, FL 33131
dgersten@grsm.com

May 20, 2026
ID: GERSP 1299620
Invoice No. 22217591
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH April 30, 2026

Fees For Professional Services:	\$2,700.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,700.00

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: 22217591

LOCKBOX ADDRESS FOR CHECKS

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El Monte, CA 91731-2823

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 Miami, FL 33131
 United States
 dvcatorneys.com

INVOICE

Invoice # 27032
 Date: 04/30/2026

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
02/01/2026	Review correspondence regarding potential buyers.	PFV	0.10	\$550.00	\$55.00
02/01/2026	Review deed regarding recently deceased unit owner.	PFV	0.10	\$550.00	\$55.00
02/01/2026	Email with real estate counsel regarding recently deceased unit owner.	PFV	0.10	\$550.00	\$55.00
02/02/2026	Email seeking offers for property sale.	PFV	0.20	\$550.00	\$110.00
02/02/2026	Email regarding Anderson unit with real estate lawyer (.2); and counsel for unit owner (.2).	PFV	0.40	\$550.00	\$220.00
02/02/2026	Calls and conferences regarding possible sale of property.	PFV	0.20	\$550.00	\$110.00
02/02/2026	Review email from R. Zellman as to Defendant, Z. Anderson.	rs	0.30	\$100.00	\$30.00
02/04/2026	Review and analyze file as to defendants served by publication (.3); draft motion for leave to re-serve defendants by publication (.5).	rs	0.80	\$100.00	\$80.00
02/05/2026	(No charge) Email to receiver regarding next homeowners' zoom meeting.	rs	0.20	\$0.00	\$0.00

02/09/2026	Strategize regarding motion for judgment on the pleadings against the Receiver or motion to abate in Hiscox insurance declaratory judgment action.	KP	0.50	\$450.00	\$225.00
02/09/2026	Email with Receiver regarding response to proposals.	PFV	0.10	\$550.00	\$55.00
02/10/2026	Work on motion for entry of final judgment as to St. Germain parties et al.	PFV	0.30	\$550.00	\$165.00
02/10/2026	Prepare status reports to Receiver.	PFV	0.20	\$550.00	\$110.00
02/10/2026	Strategize regarding motion for judgment on the pleadings in the Hiscox Declaratory Judgment action.	KP	0.50	\$450.00	\$225.00
02/10/2026	(No charge) Emails from and to receiver regarding next zoom homeowners' meeting (.2); mass email to homeowners regarding same (.5).	rs	0.70	\$0.00	\$0.00
02/11/2026	Emails regarding sale of property and pricing.	MME	0.30	\$550.00	\$165.00
02/11/2026	Conference with receiver regarding counteroffers.	PFV	0.20	\$550.00	\$110.00
02/11/2026	Work on motion for leave to re-serve defendants by publication.	rs	0.80	\$100.00	\$80.00
02/12/2026	Work on motion for default and renewed motion for summary judgment as to the Saint Germain defendants.	PFV	0.40	\$550.00	\$220.00
02/12/2026	Revise motion to re-serve defenses for partition action.	KP	0.80	\$450.00	\$360.00
02/12/2026	Revise motion for judgment on the pleadings in Hiscox declaratory judgment action.	KP	0.50	\$450.00	\$225.00
02/17/2026	Prepare for hearing on motion to approve fee application.	PFV	0.20	\$550.00	\$110.00
02/17/2026	(No charge) Draft proposed order on 11th fee application.	rs	0.30	\$0.00	\$0.00
02/18/2026	Email regarding status report.	PFV	0.10	\$550.00	\$55.00
02/18/2026	Review trial orders and prepare status report.	PFV	0.40	\$550.00	\$220.00
02/19/2026	Work on motion for judgment on the pleadings and supporting memorandum of law.	BN	0.20	\$495.00	\$99.00
02/19/2026	Work on motion for judgment on the pleadings.	PFV	2.10	\$550.00	\$1,155.00
02/19/2026	Review mediation notice in Hiscox case.	PFV	0.10	\$550.00	\$55.00
02/19/2026	Draft status report regarding same.	PFV	0.10	\$550.00	\$55.00
02/20/2026	Confer with real estate counsel regarding Leguarre defendant.	PFV	0.30	\$550.00	\$165.00

02/23/2026	Email regarding potential meeting with City officials.	PFV	0.10	\$550.00	\$55.00
02/23/2026	Email to receiver regarding status.	PFV	0.10	\$550.00	\$55.00
02/24/2026	Draft update to receiver regarding counter offers.	PFV	0.10	\$550.00	\$55.00
02/26/2026	Conference regarding market position and sale.	PFV	0.30	\$550.00	\$165.00
02/27/2026	Reviewing Motion for Judgment on pleadings; looking at sale issues.	MME	0.40	\$550.00	\$220.00
02/27/2026	Analyze claims regarding deceased owners and title issues and consult with title counsel.	PFV	0.80	\$550.00	\$440.00
02/27/2026	Work on motion for judgment on the pleadings in the Hiscox case.	PFV	0.40	\$550.00	\$220.00
03/02/2026	Emails regarding sale price and value.	MME	0.50	\$550.00	\$275.00
03/02/2026	[Diana Campagna]: Update the zoom meeting information on the homepage of the Receivership Website.	pl	0.50	\$100.00	\$50.00
03/02/2026	Email regarding reduction of listing price.	PFV	0.20	\$550.00	\$110.00
03/03/2026	Meet with tree installation crew and assist in planting trees, take photos and email update regarding the same (1.5); work on inspector visit and closing of the tree permit (0.3).	md	1.80	\$100.00	\$180.00
03/03/2026	[Diana Campagna]: Post the Receiver's 11th Report on the "Court Documents" page in the Receivership website.	pl	0.50	\$100.00	\$50.00
03/03/2026	Email with unit owner counsel K. Stanz.	PFV	0.10	\$550.00	\$55.00
03/04/2026	Email with real estate counsel regarding Anderson property.	PFV	0.20	\$550.00	\$110.00
03/04/2026	Email with Mr. Stanz regarding Leguerre property.	PFV	0.10	\$550.00	\$55.00
03/04/2026	Review and analyze file, court file and public records regarding Defendants Zilphia and Zenovia Anderson.	rs	1.00	\$100.00	\$100.00
03/09/2026	Gather and synthesize information to prepare motion as to Z. Anderson.	rs	1.50	\$100.00	\$150.00
03/10/2026	Review file and attend hearing in partition action.	PFV	0.80	\$550.00	\$440.00
03/10/2026	Email regarding form of order.	PFV	0.30	\$550.00	\$165.00
03/10/2026	Gather and synthesize information as to motion for leave to re-serve defendants by publication.	rs	1.00	\$100.00	\$100.00
03/11/2026	Review and analyze file as to defendant, Z. Anderson.	rs	1.00	\$100.00	\$100.00

03/13/2026	Email regarding Hiscox discovery report.	PFV	0.20	\$550.00	\$110.00
03/15/2026	Review fee application.	PFV	0.30	\$550.00	\$165.00
03/15/2026	Email regarding fee application preparation.	PFV	0.20	\$550.00	\$110.00
03/15/2026	Email regarding title issues.	PFV	0.10	\$550.00	\$55.00
03/16/2026	[Diana Campagna]: Post the Receiver's 12th Report on the "Court Documents" page in the Receivership website.	pl	0.50	\$100.00	\$50.00
03/16/2026	Gather and synthesize information to prepare Receiver's twelfth report and Fee Application (.6); draft email to R. Garcia regarding opening estate for deceased defendant (.3).	rs	0.90	\$100.00	\$90.00
03/17/2026	Email regarding Hernandez parties.	PFV	0.10	\$550.00	\$55.00
03/18/2026	Work on form of order regarding motion for final default as to certain Defendants in partition case.	PFV	0.40	\$550.00	\$220.00
03/18/2026	Email regarding sufficiency of service of process on certain defendants.	PFV	0.30	\$550.00	\$165.00
03/18/2026	Email regarding owner inquiry regarding title work.	PFV	0.20	\$550.00	\$110.00
03/18/2026	Gather and synthesize information to prepare proposed order on motion to re-serve defendants by publication.	rs	0.50	\$100.00	\$50.00
03/20/2026	Prepare for (.3); and attend (.6); unit owner update conference.	PFV	0.90	\$550.00	\$495.00
03/20/2026	Email with City of Miami Gardens regarding potential sale.	PFV	0.10	\$550.00	\$55.00
03/20/2026	(No Charge) Attend zoom homeowners' meeting.	rs	0.70	\$0.00	\$0.00
03/21/2026	Email with probate counsel.	PFV	0.10	\$550.00	\$55.00
03/23/2026	Emails regarding loan extension.	MME	0.20	\$550.00	\$110.00
03/23/2026	[Diana Campagna]: Post the updated Appraisal Report on the "Important Documents" page in the Receivership website.	pl	0.50	\$100.00	\$50.00
03/23/2026	Email regarding posting of updated appraisal report.	PFV	0.10	\$550.00	\$55.00
03/23/2026	Work on file regarding motion for entry of judgment on the pleadings concerning permanent injunction in Baptiste case.	PFV	0.30	\$550.00	\$165.00
03/23/2026	Review status conference order in partition action.	PFV	0.10	\$550.00	\$55.00
03/23/2026	Draft status report to the Receiver.	PFV	0.30	\$550.00	\$165.00

03/23/2026	Work on motion for entry of final judgment in receivership case.	PFV	0.80	\$550.00	\$440.00
03/23/2026	Draft notice of hearing on twelfth fee application (.2); gather and synthesize information to prepare motion for entry of final judgment on pleadings (.5).	rs	0.70	\$100.00	\$70.00
03/24/2026	Email regarding status of marketing efforts for property.	PFV	0.20	\$550.00	\$110.00
03/25/2026	Working on extension of loan.	MME	0.30	\$550.00	\$165.00
03/25/2026	Review offer to purchase.	PFV	0.20	\$550.00	\$110.00
03/25/2026	Email with receiver regarding 3.25.26 purchase offers.	PFV	0.10	\$550.00	\$55.00
03/25/2026	Email with broker regarding 3.25.26 purchase offer.	PFV	0.10	\$550.00	\$55.00
03/27/2026	Conferences and emails regarding efforts to sell property and counter offer.	PFV	0.50	\$550.00	\$275.00
03/29/2026	Reviewing Motion for Final Judgment on Pleadings and emails regarding same.	MME	0.50	\$550.00	\$275.00
03/29/2026	Email with broker regarding offer history and request for sales efforts summary.	PFV	0.20	\$550.00	\$110.00
03/29/2026	Work on motion for judgment on the pleadings in the main receivership case.	PFV	0.40	\$550.00	\$220.00
03/30/2026	Email regarding motion for entry of judgment on the pleadings in main receivership case.	PFV	0.40	\$550.00	\$220.00
04/01/2026	Email regarding case status and planning.	PFV	0.30	\$550.00	\$165.00
04/01/2026	Email regarding update of insurance policy.	PFV	0.20	\$550.00	\$110.00
04/01/2026	(No charge) Declaratory judgment action: strategize regarding attendance mediation and potential mediation settlement terms.	KP	0.20	\$0.00	\$0.00
04/02/2026	Calls with lender regarding extension (.3); call with potential purchaser; emails providing appraisals (.4).	MME	0.70	\$550.00	\$385.00
04/02/2026	Confer with County tax collector's attorney.	PFV	0.30	\$550.00	\$165.00
04/02/2026	Prepare status reports and analysis to receiver regarding tax sale on as to unit 212.	PFV	0.70	\$550.00	\$385.00
04/02/2026	Review public records regarding tax sale.	PFV	0.30	\$550.00	\$165.00
04/02/2026	Review and analyze petition to set aside and public records regarding unit 212.	PFV	0.30	\$550.00	\$165.00

04/02/2026	Review file in partition case and synthesize information needed to seek updated final judgment on Count I and final judgment on Count II.	PFV	0.80	\$550.00	\$440.00
04/02/2026	Work on motion for updated final judgment on Count I and final judgment on Count II.	PFV	1.20	\$550.00	\$660.00
04/02/2026	Review file and email with receiver regarding motion for entry of final judgment on the pleadings regarding receivership case.	PFV	0.20	\$550.00	\$110.00
04/02/2026	(No charge) Draft notice of hearing on motion for final judgment on pleadings in the receivership action.	rs	0.20	\$0.00	\$0.00
04/03/2026	Loan extension email (.2); reviewing motion for Judgment (.3).	MME	0.50	\$550.00	\$275.00
04/03/2026	Email regarding motion for entry of amended final judgment.	PFV	0.20	\$550.00	\$110.00
04/04/2026	Email with receiver regarding motion for final judgment in partition case.	PFV	0.10	\$550.00	\$55.00
04/06/2026	Work on preparation for hearing on motion for entry of final judgment in Receivership case.	PFV	0.30	\$550.00	\$165.00
04/06/2026	Work on revisions to proposed order on judgment on the pleadings in partition case (.4); and email paralegal instructions regarding same regarding title counsel approval (.1).	PFV	0.50	\$550.00	\$275.00
04/06/2026	Draft proposed order on motion for updated entry of final judgment in partition action (.3); draft proposed order on motion for entry of final judgment on pleadings in receivership action (.5); email to R. Zelman regarding same (.2); work on proposed order on 12th fee application in receivership action (.3).	rs	1.30	\$100.00	\$130.00
04/07/2026	Multiple emails with insurance agent and E. Thompson regarding additional financial documents and other information needed to obtain renewal policy for Receiver and his firm and the prior documents provided to obtaining prior insurance policy, and review same and documents provided by E. Thompson to agent.	KDM	0.20	\$525.00	\$105.00
04/07/2026	Emails regarding extension and potential offer.	MME	0.30	\$550.00	\$165.00
04/07/2026	Email with title counsel regarding tax deed sale.	PFV	0.10	\$550.00	\$55.00
04/07/2026	Prepare for (.3); and attend (.7); hearings on status conferences and motions for entry of judgment on the pleadings.	PFV	1.00	\$550.00	\$550.00
04/07/2026	Confer with Mr. Baptiste regarding status of sale	PFV	0.30	\$550.00	\$165.00

	efforts and final judgment in Baptiste case.				
04/07/2026	Email with receiver's co-counsel regarding request for financial statements.	PFV	0.10	\$550.00	\$55.00
04/07/2026	Work on form of order regarding receivership.	PFV	0.30	\$550.00	\$165.00
04/08/2026	Reviewing judgment and providing comments; reviewing and revising extension document.	MME	0.40	\$550.00	\$220.00
04/08/2026	Revise proposed order on motion for judgment on the pleadings.	PFV	0.20	\$550.00	\$110.00
04/08/2026	(No charge) Review orders from receivership and partition cases and prepare status report.	PFV	0.20	\$0.00	\$0.00
04/08/2026	Draft first amended consolidated note to extend maturity date for another six months for the loans new wave has provided to the receivership state.	KP	1.00	\$450.00	\$450.00
04/09/2026	Status and strategy for declaratory judgment case by insurance company.	MME	0.20	\$550.00	\$110.00
04/09/2026	Review email regarding discovery matters and extensions.	PFV	0.40	\$550.00	\$220.00
04/09/2026	Review factual background regarding information for inclusion in interrogatory responses.	PFV	0.30	\$550.00	\$165.00
04/09/2026	Analyze communications from council for plaintiff regarding motion for extension of time relating to dispositive motions and discovery cutoff and strategize with internal team regarding position on requested deadline extensions.	KP	0.20	\$450.00	\$90.00
04/09/2026	Analyze plaintiffs request for production to receiver and interrogatories to receiver; draft notes for objections answers and responses two plaintiffs discovery to the receiver strategize regarding obtaining an extension of time to respond to discovery pending mediation communications with counsel for plaintiff regarding extension of time to respond to discovery pending mediation settlement negotiations with plaintiffs' counsel concerning potential settlement structure.	KP	3.00	\$450.00	\$1,350.00
04/09/2026	Draft settlement communication to counsel for plaintiff; strategize regarding settlement proposal to plaintiff; revise and finalize and transmit settlement proposal e-mail to plaintiffs' counsel.	KP	0.50	\$450.00	\$225.00
04/10/2026	Work on response and objections to Hiscox's request for production of documents with focus on objections to non-testifying expert correspondence, settlement communications and Receiver's correspondence with his counsel and file review regarding potentially responsive	PFV	2.30	\$550.00	\$1,265.00

	documents.				
04/10/2026	Work on revised responses to Hiscox's interrogatories to receiver.	PFV	0.70	\$550.00	\$385.00
04/10/2026	Review file of additional documents regarding potentially responsive documents regarding Hiscox request for production of documents.	PFV	0.30	\$550.00	\$165.00
04/10/2026	Review order granting twelfth fee application.	PFV	0.20	\$550.00	\$110.00
04/10/2026	Analyze internal comments to discovery responses and documents and strategize regarding necessary edits to documents prior to sending to client.	KP	0.50	\$450.00	\$225.00
04/10/2026	Gather and synthesize information to prepare responses and objections to plaintiff's discovery requests.	rs	0.80	\$100.00	\$80.00
04/13/2026	Review Hiscox's response to request for admissions.	PFV	0.10	\$550.00	\$55.00
04/13/2026	Analyze motion prepared by plaintiffs for continuing certain deadlines including discovery cut off and dispositive motions; strategize regarding potential comments to motion; strategize regarding responding to discovery based upon extended deadline or current deadline.	KP	1.00	\$450.00	\$450.00
04/13/2026	Communications with counsel for plaintiff regarding lack of opposition from the receiver pertaining to motion for extension of time concerning dispositive motion deadline and discovery deadline.	KP	0.20	\$450.00	\$90.00
04/13/2026	Strategize regarding responding to discovery in light of plaintiff's motion for extension of time regarding fact discovery period and the dispositive motion deadline.	KP	0.20	\$450.00	\$90.00
04/13/2026	Strategize regarding discovery propounded by Plaintiff in Hiscox insurance declaratory action.	KP	0.50	\$450.00	\$225.00
04/15/2026	Analyze plaintiffs' motion to continue discovery deadline and related pretrial deadlines in Hiscox declaratory judgment.	KP	0.30	\$450.00	\$135.00
04/16/2026	Confer with counsel for the County regarding hearing on trial setting and renewed motion for entry of final judgment in partition case.	PFV	0.50	\$550.00	\$275.00
04/16/2026	Work on preparation for hearing on motion for renewed summary judgment.	PFV	0.80	\$550.00	\$440.00
04/16/2026	Call with client regarding preparation for hearing on motion for summary judgment.	PFV	0.10	\$550.00	\$55.00

04/17/2026	Emails with potential buyer.	MME	0.20	\$550.00	\$110.00
04/17/2026	Prepare for (.2); and attend (.4); hearing on motion for entry of final judgment in partition case.	PFV	0.60	\$550.00	\$330.00
04/17/2026	Confer with receiver regarding status and planning.	PFV	0.20	\$550.00	\$110.00
04/17/2026	Work on discovery responses in Hiscox case.	PFV	0.70	\$550.00	\$385.00
04/17/2026	Email with City of Miami Gardens regarding request for interest in property purchase.	PFV	0.10	\$550.00	\$55.00
04/17/2026	Comment on draft interrogatories and requests for production in Hiscox insurance declaratory judgment action period.	KP	0.50	\$450.00	\$225.00
04/17/2026	Email to Receiver regarding responses to plaintiff's discovery requests in Hiscox action.	rs	0.20	\$100.00	\$20.00
04/19/2026	Email regarding sales efforts.	PFV	0.10	\$550.00	\$55.00
04/19/2026	Email regarding sales efforts.	PFV	0.10	\$550.00	\$55.00
04/20/2026	Revising discovery responses in declaratory judgment action and discuss same with P. Valori.	MME	0.60	\$550.00	\$330.00
04/20/2026	Analyze issues with respect to finalizing and serving responses to Hiscox discovery in Hiscox's declaratory judgment action in federal court.	KP	0.50	\$450.00	\$225.00
04/21/2026	Review and revise order on motion for updated final judgment in partition case.	PFV	0.30	\$550.00	\$165.00
04/21/2026	Review tenant responses to Hiscox discovery.	PFV	0.40	\$550.00	\$220.00
04/21/2026	Email regarding potential interest of City of Miami Gardens in property.	PFV	0.20	\$550.00	\$110.00
04/22/2026	Work on file regarding sales efforts.	PFV	0.30	\$550.00	\$165.00
04/22/2026	Email regarding sales efforts.	PFV	0.10	\$550.00	\$55.00
04/22/2026	Confer with Mr. Baptiste regarding hearing on motion for entry of final judgment in Partition case.	PFV	0.30	\$550.00	\$165.00
04/22/2026	Review and analyze production from tenants.	rs	0.50	\$100.00	\$50.00
04/24/2026	Conferences and email regarding sales efforts and updated offer.	PFV	0.20	\$550.00	\$110.00
04/26/2026	Email with counsel for probate matters regarding payment coordination.	PFV	0.20	\$550.00	\$110.00
04/26/2026	Email regarding status and sale efforts.	PFV	0.30	\$550.00	\$165.00
04/30/2026	Preparing for mediation; call with Receiver	MME	1.00	\$550.00	\$550.00

regarding same.					
04/30/2026	Prepare for mediation and telephone conference with M. Damian and client.	BN	0.30	\$495.00	\$148.50
				Hours Subtotal	68.0
				Fees Subtotal	\$28,127.50

Expenses

Type	Date	Description	Quantity	Rate	Amount
Expense	11/01/2025	Loan to Receivership for association expenses	1.00	\$10,000.00	\$10,000.00
Expense	01/01/2026	Loan to Receivership for association expenses	1.00	\$10,000.00	\$10,000.00
Expense	02/02/2026	Loan to Receivership for association expenses	1.00	\$10,000.00	\$10,000.00
Expense	02/09/2026	Interest on loan	1.00	\$1,201.66	\$1,201.66
Expense	02/10/2026	Webmaster. Invoice 1468937. Domain Names - .com domain (newworldcondoreceivership.com) 02/09/2026-02/09/2027.	1.00	\$24.19	\$24.19
Expense	02/25/2026	Webmaster. Invoice 1498130. Shared Hosting - Starter Hosting (newworldcondoreceivership.com) 03/01/2026-04/01/2026.	1.00	\$12.95	\$12.95
Expense	02/28/2026	Photocopies	77.00	\$0.25	\$19.25
Expense	03/09/2026	Interest on loan	1.00	\$1,129.72	\$1,129.72
Expense	03/25/2026	Webmaster. Invoice 1577876. Shared Hosting- Starter Hosting (newworldcondoreceivership.com) Service April 1st-May 1st.	1.00	\$12.95	\$12.95
Expense	03/31/2026	Photocopies	3.00	\$0.25	\$0.75
Expense	04/01/2026	Loan to Receivership for association expenses	1.00	\$10,000.00	\$10,000.00
Expense	04/09/2026	Interest on loan	1.00	\$1,224.99	\$1,224.99
Expense	04/25/2026	Webmaster. Invoice 1641622. Shared Hosting- Starter Hosting (newworldcondoreceivership.com) May 1-June 1, 2026.	1.00	\$12.95	\$12.95
Expense	04/30/2026	Pacer/Court Documents	1.00	\$8.80	\$8.80
Expense	04/30/2026	Lexis Nexis Research Fee	1.00	\$1.43	\$1.43
Expense	04/30/2026	Photocopies	500.00	\$0.25	\$125.00
Expense	04/30/2026	K&A Mediation. Invoice 17138. Prepare and attend meditation services. Hiscox v. Prestige. 05.01.26	1.00	\$309.37	\$309.37

Expenses Subtotal \$44,084.01

Name	Hours	Rate	Amount
Melanie Damian	6.1	\$550.00	\$3,355.00
Kenneth Murena	0.2	\$525.00	\$105.00
Brett Novick	0.5	\$495.00	\$247.50
Law Clerk/ Paralegal	2.0	\$100.00	\$200.00
Kristopher Pearson	10.7	\$450.00	\$4,815.00
Kristopher Pearson	0.2	\$0.00	\$0.00
Peter Valori	32.9	\$550.00	\$18,095.00
Peter Valori	0.2	\$0.00	\$0.00
Mary Dhanji	1.8	\$100.00	\$180.00
Reesea Saetae	11.3	\$100.00	\$1,130.00
Reesea Saetae	2.1	\$0.00	\$0.00
Hours Total			68.0
Subtotal			\$72,211.51
Amount			\$72,211.51

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Due
(\$822,436.36	+ \$72,211.51) - (\$0.00) = \$894,647.87

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
26609	01/31/2026	\$31,492.25	\$0.00	\$31,492.25

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
27032	04/30/2026	\$72,211.51	\$0.00	\$72,211.51
Outstanding Balance				\$894,647.87
Total Amount Due				\$894,647.87

Please make all amounts payable to: Damian Valori Culmo

Please call 305-371-3960 for questions.

Payment is due upon receipt.

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

February 25, 2026
Invoice Number 113942

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

PROFFESIONAL SERVICES

			Hours	
01/27/26	RMZ	Telephone call with Peter Valori, Esq.	0.30	
01/30/26	RMZ	Telephone call with Peter Valori, Esq. (2) regarding Units 218 and 219; review Deeds, Affidavits, emails, etc. regarding Ziphilia Zenovia Anderson.	0.90	
02/02/26	RMZ	Review correspondence from Peter Valori, Esq; prepare correspondence to Peter Valori, Esq.	0.30	
02/24/26	RMZ	Review documents regarding Unit 236; prepare correspondence to Brian Stringer of Old Republic.	0.20	
		TOTAL HOURS AND FEES	1.70	841.50

TOTAL STATEMENT

841.50

Fee Summary

Hours

Amount

Richard M. Zelman

1.70

841.50

Total Fees

1.70

841.50

01/25/26

PREVIOUS BALANCE

32,229.02

Total this Bill

841.50

NEW BALANCE

33,070.52

Accounts Receivable Aging

Current

841.50

30 Days

0.00

60 Days

1,287.00

90 Days

940.50

120 Days

30,001.52

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Two Datran Center, Suite 1209
9130 South Dadeland Boulevard
Miami, Florida 33156
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ID#: 65-0212052

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

March 25, 2026
Invoice Number 113962

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

PROFFESIONAL SERVICES

			Hours	
03/04/26	RMZ	Telephone call with Brian Stringer; review correspondence from Brian; prepare correspondence to Peter Valori.	0.30	
03/05/26	RMZ	Preparation of correspondence to Peter Valori regarding Zenaida.	0.30	
03/18/26	RMZ	Review March 4 correspondence from Brian Stringer regarding Leguerre and its application to Zillphia Anderson; review correspondence from Peter Valori, Esq; prepare correspondence to Peter.	0.30	
		TOTAL HOURS AND FEES	0.90	445.50
		TOTAL STATEMENT		445.50

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	0.90	445.50
Total Fees	0.90	445.50

02/25/26	PREVIOUS BALANCE	33,070.52
	Total this Bill	445.50
	<u>NEW BALANCE</u>	<u>33,516.02</u>

Accounts Receivable Aging

Current	1,287.00
30 Days	0.00
60 Days	0.00
90 Days	1,287.00
120 Days	30,942.02

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

April 25, 2026
Invoice Number 113983

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

PROFFESIONAL SERVICES

			Hours	
04/06/26	RMZ	Review proposed Order and Judgment; correspondence with Peter Valori, Esq.	0.20	
04/08/26	RMZ	Telephone call with Peter Valori, Esq. regarding individual unit tax sale.	0.50	
TOTAL HOURS AND FEES			0.70	346.50
TOTAL STATEMENT				346.50

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	0.70	346.50
Total Fees	0.70	346.50

03/25/26	PREVIOUS BALANCE	33,516.02
	Total this Bill	346.50
	<u>NEW BALANCE</u>	<u>33,862.52</u>

Accounts Receivable Aging

Current	346.50
30 Days	1,287.00
60 Days	0.00
90 Days	0.00
120 Days	32,229.02

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 \$5,850.00_ and costs in the amount of \$0, for a total of \$5,850.00for the period from February 1, 2026 through April 30, 2026;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver, incurred fees in the amount of \$28,127.50 and costs in the amount of \$44,084.01, for a total of \$72,211.51 for the period from February 1, 2026 through April 30, 2026; and

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver, incurred fees in the amount of \$1,633.50 for the period from February 1, 2026 through April 30, 2026;

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

DONE AND ORDERED in Miami, Florida, this ____ day of _____, 2026.

CIRCUIT COURT JUDGE

Copies to all Counsel of Record