

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 THIRD 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 third 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] and Second Report [D.E. 29], 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 foregoing professionals have been instrumental to the Receiver's success in this case, helping him secure the Association's assets and evaluate the value of the condominium property and 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, allowing certain unit owners to temporarily access the condominium property to retrieve their personal belongings, determining the estimated and/or potential value of the Receivership Estate (*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. Efforts Obtaining Financial Records and Securing Assets.

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 when 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 November 10, 2023, as **Exhibit A** (Standard Fund Accounting Report).

And, the Court approved the demolition of the structurally damaged building on the condominium property on August 17, 2023 [D.E. 32], and approved the payment of certain creditors of the Association and some fees of professionals on September 19, 2023 [D.E. 35]. Further information regarding the demolition is set forth below.

Also, the Court approved two loan certificates in the amount of four-hundred-thousand dollars (\$400,000) for payment to certain creditors and professional on March 28, 2023, and in the amount of five-hundred-thousand dollars (\$500,000) for the demolition on August 17, 2023.

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 Second Report [D.E. 29], 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 dozens of calls and emails from residents and unit owners each week, answering questions or providing requested information or both. The Receiver and Lead Counsel have also held twelve Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer questions. The most recent Zoom Meetings were held on August 22, 2023 and October 23, 2023.

D. Retrieval of Belongings.

As set forth in the Receiver's prior reports [D.E. 23 and 29], the Building Official for the City of Miami Gardens authorized certain unit owners to retrieve their personal belongings from

certain units, and all authorized residents and unit owners who scheduled appointments successfully retrieved their personal belongings from their units and their vehicles from the property.¹ Since the filing of the Receiver's Second Report [D.E. 29], no further appointments are being made absent special circumstances due to the pending demolition discussed *infra*.

E. Written Notice Required for Repairs.

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

F. Demolition.

On August 16, 2023, 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 [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].

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

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.

Notice of Demolition filed above-captioned action [D.E. 32]. Such notice also provided that Demolition Gods LLC was contracted to perform the demolition services.

In preparation of the permitting process and demolition, Demolition Gods LLC took drone footage and photographs of the condominium property, obtained an asbestos report (**Exhibit B**), and obtained a survey of the property (**Exhibit C**). And, the Receiver, through Lead Counsel, executed a notice of commencement for the demolition (**Exhibit D**), and related permit applications (**Composite Exhibit E**).² The permit applications were submitted to the Building Official for the City of Miami Gardens on or about October 2, 2023. The demolition will commence after the permit applications are approved by the Building Official for the City of Miami Gardens, and is expected to be completed within 1-3 months of such approval date.

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 and 29], 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

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.

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 The “Eliteway Class Action” was previously referred to as the “Whitfield Class Action” in the Receiver’s prior reports [D.E. 23 and 29], but 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).

members on March 3, 2023. *See Whitfield, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Whitfield Class Action”).

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

ii. Thomas Class Action.

As referenced in the Receiver’s prior reports [D.E. 23 and 29], 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 is no longer a party to that action.

The plaintiffs in that case have 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 have 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].

iii. The Valtom Action.

As referenced in the Receiver’s prior reports [D.E. 23 and 29], one of the unit owners, Valtom, LLC, filed a lawsuit against the Association and its former property management

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

iv. The Forty Year Investment Action.

As referenced in the Receiver’s prior reports [D.E. 23 and 29], 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. *See* Notice of Voluntary Dismissal, attached as **Exhibit G**.

v. The Deutsche Bank Action.

As referenced in the Receiver’s prior reports [D.E. 23 and 29], 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 has not been properly effectuated upon the Association, *i.e.* it appears that the plaintiff in that case defectively served the Florida Secretary of State. *See* Return of Service, attached as **Exhibit H**. The Receiver and Lead Counsel have appeared in the Deutsche Bank Action, and will be moving to transfer that case to the above-captioned division.

vi. Mechanic’s Lien.

As referenced in the Receiver’s Second Report [D.E. 29], 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. *See* Demand Letter to Roofers, attached as **Exhibit I**. 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.

H. Legal Proceedings Brought by the Receiver.

i. The Partition Action.

As referenced in the Receiver's prior reports [D.E. 23 and 29], the Receiver, through Lead Counsel, filed a complaint for partition and declaratory judgment against the unit owners and other interested parties with the intent of having the condominium property converted into a fee simple estate to be sold and that the sales proceeds will be distributed in accordance with the Order Appointing Receiver [D.E. 10] and further orders of the Court. *See Gersten v. Higgs, et al.*, Case No. 2023-015785-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Partition Action").⁵

Since the filing of the Receiver's Second Report [D.E. 29], the Court extended the time for the Receiver to effectuate service of process upon the more than 100 respondents in that case (most of which have already been served or signed a waiver of service) up to and including October 31, 2023. Thereafter, the Receiver moved for another extension of time to effectuate service of process up to and including February 29, 2024. The Receiver, through Lead Counsel, has continued his efforts to serve the remaining respondents. The Receiver remains hopeful that the Partition Action

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

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

ii. The Prestige Action.

As referenced in the Receiver's Second Report [D.E. 29], 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"). Since the filing of the Receiver's Second Report [D.E. 29], Prestige moved for a more definite statement.

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 APPOINTING RECEIVER**

As detailed in the Receiver’s prior reports [D.E. 23 and 29], as well as his foregoing Third 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”), 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 (“Special Counsel”).

The fees and costs incurred by GRSM and Lead Counsel are reflected on the invoices attached hereto as **Composite Exhibit 1**, which reflect the time entries and work performed by the Receiver and Lead Counsel for the benefit of the Association from July 1, 2023 through October 31, 2023,⁶ 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 2**, and reflect the time entries and work performed by Special Counsel for the benefit of the Association from August 1, 2023 through October 31, 2023, as well as the Receiver’s reductions thereto.

As reflected in **Composite Exhibit 1**, from July 1, 2023 to October 31, 2023, GRSM incurred fees in the total amount of \$34,723.00 and costs in the amount of \$42.47, and Lead

⁶ November 2023 invoices from GRSM, Lead Counsel, and Special Counsel will be submitted with the Receiver’s fourth report.

Counsel incurred fees in the amount of \$104,772.50 and costs in the amount of \$3,766.55. As reflected in **Composite Exhibit 2**, from August 1, 2023 to October 31, 2023, Special Counsel incurred fees in the amount of \$7,169.25, and costs in the amount of \$29.10.⁷

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees and costs of Special Counsel from August 1, 2023 to October 31, 2023 in the total amount of \$7,198.35. GRSM and Lead Counsel seek approval of their fees and costs from July 1, 2023 through October 31, 2023, 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 3**.

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);

⁷ The foregoing professionals have reduced their regular rates for this matter along with additional reductions and discounts, and the Receiver has utilized lower rate professionals whenever possible.

(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 14th day of November, 2023.

By: s/Melanie E. Damian

Melanie E. Damian, Esq.

Exhibit A

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

STANDARDIZED FUND ACCOUNTING REPORT

Fund for Louis Jean Baptiste et al. v. New World Condo Apartments Condominium Assn Inc.
Reporting Period 2/7/2022 to 11/10/2023

		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]	\$ 990,906.57	\$ 990,906.57	\$ 990,906.57
Line 4	Special Assessment	\$ -	\$ -	\$ -
Line 5	Business Asset Liquidation		\$ -	\$ -
Line 6	Interest	\$ 181.14	\$ 181.14	\$ 181.14
Line 7	Third-Party Litigation Income	\$ -	\$ -	\$ -
Line 8	Miscellaneous - Other	\$ -	\$ -	\$ -
	Total Funds Available			\$ 991,087.71
	(Lines 1-8):			
	Decreases in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Business Operations [1]	\$ 620,668.03	\$ 620,668.03	\$ 620,668.03
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	Total Disbursements for Operations			\$ 620,668.03
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)			\$ 620,668.03
Line 13	Ending Balance (As of November 10, 2023)			\$ 370,419.68
Line 14	Ending Balance of Fund – Net Assets:			
	Total Ending Balance of Fund – Net Assets			\$ 370,419.68

[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
8/15/2023	Maintenance Fee Deposit	\$ 269.13

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

Date of Check	From	Amount
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
Total		\$ 990,906.57

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
Total		\$ 181.14

GRAND TOTAL OF RECEIPTS \$ 991,087.71

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	Bank Fee (returned check)	\$ 12.00
3/6/2023	Panissa Security (security)	\$ 5,000.00
3/6/2023	John's Garage Door (repair automatic gate)	\$ 299.60
3/6/2023	Waste Connection (dumpster and removal)	\$ 2,422.24
3/7/2023	HSM Consulting, Inc. (private fire investigator)	\$ 1,800.00
3/14/2023	Panissa Security (security)	\$ 2,909.94
3/14/2023	AppraisalFirst Real Estate Appraisers (land appraisal)	\$ 3,000.00
3/27/2023	Panissa Security (security)	\$ 3,000.00
3/31/2023	T-mobile (receivership phone)	\$ 20.00
4/5/2023	Legal Fees for Closing Loan (loan)	\$ 3,500.00
4/5/2023	Closing Costs for Loan (loan)	\$ 8,000.00
4/6/2023	Panissa Security (security)	\$ 2,000.00
4/6/2023	Demolition Gods (debris clean up)	\$ 6,500.00
4/6/2023	Bank Fee (wire transfer)	\$ 15.00
4/6/2023	Bank Fee (wire transfer)	\$ 15.00
4/7/2023	Stonemark Inc. (insurance)	\$ 12,598.42
4/7/2023	Bank Fee (ACH payment)	\$ 10.00
4/7/2023	HSM Consulting, Inc. (private fire investigator)	\$ 6,558.82
4/7/2023	Morandi Engineering and Construction	\$ 2,995.00
4/7/2023	Waste Connection (dumpster and removal)	\$ 209.68
4/7/2023	Waste Connection (dumpster and removal)	\$ 576.77
4/7/2023	Panissa Security (security)	\$ 2,909.94
4/7/2023	Panissa Security (security)	\$ 7,909.94
4/7/2023	Quality Fence and Gates, Corp. (safety fence)	\$ 4,800.00
4/7/2023	Stonemark Inc. (insurance)	\$ 12,009.21
4/11/2023	Demolition Gods (debris clean up)	\$ 6,500.00
4/11/2023	Bank Fee (wire transfer)	\$ 15.00
4/11/2023	Avante-Nea Ins. Group, Inc. (insurance)	\$ 4,756.26
4/17/2023	Stonemark Inc. (insurance)	\$ 1,428.57
4/17/2023	Bank Fee (ACH payment)	\$ 10.00
4/18/2023	Panissa Security (security)	\$ 3,954.72
4/18/2023	Panissa Security (security)	\$ 3,954.72
4/19/2023	Demolition Gods	\$ 13,000.00
4/19/2023	Bank Fee (wire transfer)	\$ 15.00
4/21/2023	Stonemark Inc. (insurance)	\$ 11,984.21
4/21/2023	Bank Fee (ACH payment)	\$ 10.00
5/1/2023	Damian Valori Culmo (legal fees)	\$ 137,794.21
5/1/2023	Gordon Rees Scully Mansukhabi LLP (legal fees)	\$ 32,860.00
5/1/2023	Bank Fee (wire transfer)	\$ 15.00
5/1/2023	The Morgan Law Group (legal fees)	\$ 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. (insurance)	\$ 1,346.26
5/1/2023	Bank Fee (ACH payment)	\$ 10.00
5/1/2023	T-mobile (receivership phone)	\$ 20.00
5/3/2023	Maverick Security Services LLC (security)	\$ 1,810.44
5/18/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
5/18/2023	Bank Fee (wire transfer)	\$ 15.00
5/18/2023	Stonemark Inc. (insurance)	\$ 11,984.21
5/18/2023	Bank Fee (ACH payment)	\$ 10.00
5/19/2023	Panissa Security (security)	\$ 3,954.72
5/19/2023	Maverick Security Services LLC (security)	\$ 8,448.72
5/24/2023	DVS Technologies (receivership website)	\$ 433.35
5/24/2023	DVS Technologies (receivership website)	\$ 379.85
5/24/2023	The Madison Insurance Group (insurance)	\$ 716.00
5/2/2023	The Madison Insurance Group (insurance)	\$ 2.95
5/31/2023	T-mobile (receivership phone)	\$ 20.00
6/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
6/1/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/13/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/13/2023	Stonemark Inc. (insurance)	\$ 11,984.21
6/13/2023	Bank Fee (ACH payment)	\$ 10.00
6/2/2023	The Madison Ins. Group (insurance)	\$ 4,180.05
6/21/2023	The Madison Ins. Group (insurance)	\$ 2.95
6/27/2023	Waste Connection (dumpster and removal)	\$ 1,013.33
6/27/2023	The Madison Ins. Group (insurance)	\$ 1,995.00
6/27/2023	The Madison Ins. Group (insurance)	\$ 2.95
6/27/2023	Maverick Security Services LLC (security)	\$ 8,448.72
6/30/2023	T-mobile (receivership phone)	\$ 20.00
7/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
7/11/2023	Maverick Security Services LLC (security)	\$ 8,649.88
7/14/2023	Action Junk Removal Services (junk removal)	\$ 450.00
7/24/2023	Waste Connection (dumpster and removal)	\$ 77.65
7/25/2023	Vanguard Construction (estimate of repairs)	\$ 10,000.00
7/25/2023	Maverick Security Services LLC (security)	\$ 8,448.72
7/31/2023	T-mobile (receivership phone)	\$ 20.00
8/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
8/8/2023	Maverick Security Services LLC (security)	\$ 8,448.72
8/22/2023	Maverick Security Services LLC (security)	\$ 8,448.72
8/31/2023	T-mobile (receivership phone)	\$ 20.00
9/1/2023	New Wave Loan (loan interest payment)	\$ 3,300.00
9/7/2023	Maverick Security Services LLC (security)	\$ 8,448.72
9/18/2023	New Wave Loan (loan interest payment)	\$ 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	Bank Fee (wire transfer)	\$ 15.00
9/19/2023	Demolition Gods (demolition)	\$ 93,750.00
9/19/2023	Bank Fee (wire transfer)	\$ 15.00
9/19/2023	Sacher Zelman Harman PA (legal fees)	\$ 14,407.00
9/19/2023	Maverick Security Services LLC (security)	\$ 8,448.72
9/29/2023	T-mobile (receivership phone)	\$ 20.00
10/1/2023	New Wave Loan (loan interest payments)	\$ 3,300.00
10/6/2023	Maverick Security Services LLC (security)	\$ 8,448.72
10/16/2023	Maverick Security Services LLC (security)	\$ 8,448.72
10/18/2023	New Wave Loan (loan interest payments)	\$ 4,125.00
10/30/2023	Maverick Security Services LLC (security)	\$ 8,448.72
10/31/2023	T-mobile (receivership phone)	\$ 20.00
11/1/2023	New Wave Loan (loan interest payments)	\$ 3,300.00
GRAND TOTAL OF EXPENSES		\$ 620,668.03

Exhibit B



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
• Site Investigations/Assessments • Indoor Air Quality Testing • Monitoring • Radon Gas Measurements • Chemical Exposure Monitoring

Prepared For:
Lindsay Fitzpatrick
Demolition Gods

Job Site:
Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169

Project Number: 2023-2277 Table of Contents - Asbestos Report

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Technician Who Conducted this Survey.....	3
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Prepared For:
Lindsay Fitzpatrick
Demolition Gods

On 9/25/2023, ARS Environmental, Inc. conducted an asbestos survey at the following address:

**Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169**

The **Interior, Exterior, and Roof** of the above mentioned job site address was visually inspected in order to identify any building materials that may contain asbestos. The samples collected were sent to a laboratory for analysis.

The following nonsuspect materials were observed during this survey. No samples were taken: carpet, a/c duct, fiberglass, glass, metal, wood, wood flooring. Rubberized caulking around the windows. A/C duct fiberglass insulation observed. Fiberglass insulation observed behind walls.

The job site was not occupied at the time of the inspection.

Based on the results of the bulk samples sent in for laboratory analysis, asbestos was detected in amounts greater than 1%.

It has been a pleasure working with you.
Please call on us again.

Alex Front, MSc
ARS Environmental, Inc.



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Prepared For:
Lindsay Fitzpatrick
Demolition Gods

Job Site:
Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169

Ron DeSantis, Governor Melanie S. Griffin, Secretary

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ASBESTOS LICENSING UNIT

THE ASBESTOS BUSINESS ORGANIZATION HEREIN IS LICENSED UNDER THE
PROVISIONS OF CHAPTER 469, FLORIDA STATUTES

ARS ENVIRONMENTAL, INC.
TIMOTHY CAUGHEY
151 N NOB HILL ROAD #462
PLANTATION FL 33324


LICENSE NUMBER: ZA0000164

EXPIRATION DATE: NOVEMBER 30, 2025

Always verify licenses online at MyFloridaLicense.com

Do not alter this document in any form.

This is your license. It is unlawful for anyone other than the licensee to use this document.



I hereby certify that this asbestos survey was conducted at the above referenced Job Site on 9/25/2023, and performed by Ariel Hamilton, accredited by the EPA as AHERA Inspector(s), utilizing the code of the Federal Regulation Standards, 40 CFR, Part 763, Subpart E, Section 763.80-763.99 and the State Asbestos Regulations, Florida Statutes 469.003.

Tim Caughey, M.P.H. (IA0000016)
Florida Licensed Consultant
Asbestos Business Organization



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Prepared For:
Lindsay Fitzpatrick
Demolition Gods

Job Site:
Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169

VRET

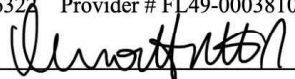
Vern Roberts Environmental Training, Inc.
13987 94th Avenue Seminole, FL 33776
727-239-1445

Certifies that

ARIEL HAMILTON

Has satisfactorily completed the requisite training for asbestos accreditation under TSCA TITLE II, EPA Model Accreditation Plan (40CFR763 E) for the 4-hour Inspector (Survey & Mechanical) Refresher Course on 5/4/2023, and in testimony whereof, we do confer this certificate on 5/4/2023.

Date of Course: 5/4/2023 Expiration Date 5/4/2024
Certificate # 05042302AM
Course # FL49-0006322 Provider # FL49-0003810


INSTRUCTOR

Ariel Hamilton



Certified Asbestos Surveyor
ARS Environmental, Inc.



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Prepared For:
 Lindsay Fitzpatrick
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Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 1	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	12,986 sq. ft.	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 2	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 3	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 4	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 5	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 6	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected
Sample 7	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	
									Asbestos Not Detected



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Job Site:
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 395 NW 177th Street
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	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 8	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	Asbestos Not Detected
Sample 9	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	Asbestos Not Detected
Sample 10	Spray applied ceiling texture; Popcorn Throughout building ceilings surface.	Included Above	Surfacing Material	Good	None	None	Low	Friable	Asbestos Not Detected
Sample 11	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	29,169 sq. ft.	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 12	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 13	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 14	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected



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Sample	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 15	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 16	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 17	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 18	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 19	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 20	Wallboard/joint compound Throughout building ceilings, partitions and perimeter walls.	Included Above	Surfacing Material	Fair	Yes	Yes	High	Friable	Asbestos Not Detected
Sample 21	Ceramic tile & grout Throughout building floors between and under tiles.	To be Determined	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected



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 Demolition Gods

Job Site:
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Sample	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 22	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 23	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 24	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 25	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 26	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 27	Ceramic tile & grout Throughout building floors between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 28	12" x 12" Peel & Stick Tile; Beige and Mastic Throughout kitchen and passageway of 1/2 bedrooms of unit 208 and unit 129 floor and unit 105 floor.	933 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected



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Sample	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 29	12" x 12" Peel & Stick Tile; Beige and Mastic Throughout kitchen and passageway of 1/2 bedrooms of unit 208 and unit 129 floor and unit 105 floor.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 30	12" x 12" Peel & Stick Tile; Beige and Mastic Throughout kitchen and passageway of 1/2 bedrooms of unit 208 and unit 129 floor and unit 105 floor.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 31	12" x 12" Peel & Stick Tile; Brown and Mastic Throughout water heater closet of unit 109.	9 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 32	12" x 12" Peel & Stick Tile; Black and Mastic Throughout unit 205 floor except living room and bedroom and throughout maintenance room floor.	896 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 33	12" x 12" Peel & Stick Tile; Black and Mastic Throughout unit 205 floor except living room and bedroom and throughout maintenance room floor.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 34	12" x 12" Peel & Stick Tile; Black and Mastic Throughout unit 205 floor except living room and bedroom and throughout maintenance room floor.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected



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	Description and Location	Approximate Size	Material Class	Physical Condition	Water Damage	Material Contact	Material Friability	Cat
Sample 35	Mirror Mastic; Black Behind 340 square feet of mirrors in units 119 & 127 and unit 207 living rooms.	12 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable I
							Asbestos Detected	
Sample 36	Mirror Mastic; Black Behind 340 square feet of mirrors in units 119 & 127 and unit 207 living rooms.	Included Above	Miscellaneous	Good	None	None	High	Non-friable I
							Asbestos Detected	
Sample 37	Ceramic tile & grout Throughout laundry room floor between and under tiles.	364 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable
							Asbestos Not Detected	
Sample 38	Ceramic tile & grout Throughout laundry room floor between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable
							Asbestos Not Detected	
Sample 39	Ceramic tile & grout Throughout laundry room floor between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable
							Asbestos Not Detected	
Sample 40	Ceramic tile & grout Throughout laundry room floor between and under tiles.	Included Above	Miscellaneous	Good	None	None	High	Non-friable
							Asbestos Not Detected	
Sample 41	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	To be Determined	Miscellaneous	Good	None	None	High	Non-friable
							Asbestos Not Detected	



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	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 42	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 43	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 44	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 45	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 46	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 47	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 48	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected



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Sample	Description and Location	Approximate Size	Material Class	Condition	Physical Damage	Water Damage	Material Contact	Material Friability	Cat
Sample 49	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 50	Interior/exterior concrete structure Throughout building floor slabs, partitions and perimeter walls.	Included Above	Miscellaneous	Good	None	None	High	Non-friable	Asbestos Not Detected
Sample 51	Roof Material; membrane Over building.	9.713 sq. ft.	Miscellaneous	Fair	Yes	None	Low	Non-friable	Asbestos Not Detected
Sample 52	Roof Material; membrane Over building.	Included Above	Miscellaneous	Fair	Yes	None	Low	Non-friable	Asbestos Not Detected
Sample 53	Roof Material; flashing Over building along perimeter.	793 In. ft.	Miscellaneous	Good	None	None	Low	Non-friable	Asbestos Not Detected
Sample 54	Roof Material; flashing Over building along perimeter.	Included Above	Miscellaneous	Good	None	None	Low	Non-friable	Asbestos Not Detected

The following nonsuspect materials were observed during this survey. No samples were taken: carpet, a/c duct, fiberglass, glass, metal, wood, wood flooring. Rubberized caulking around the windows. A/C duct fiberglass insulation observed. Fiberglass insulation observed behind walls.

The job site was not occupied at the time of the inspection.



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Miami Gardens, FL 33169

Cat I Positive Samples Found

The following page (or pages) list the Category I asbestos containing building materials. These may be left in place if deemed to be in good condition and no repairs or renovations are scheduled which would disturb them. Care should be taken to ensure that the materials are not disturbed during repair, renovation or remodeling activities which could possibly release fibers into the air. To reduce the intrinsic liability to the owners, the ultimate solution may be to have the material removed. However, at the minimum, a formal Operations and Maintenance (O&M) Program is recommended to minimize potential fiber releases, monitor any future deterioration, and to ensure proper record keeping.

Under the FDEP regulations, Category I non-friable asbestos-containing materials may be left in place during demolition under wet conditions. However, OSHA regulations require that disposal of asbestos-containing materials and debris is disposed of in a leak-tight and labeled container. The container may be plastic bags so long as the holding is leak-tight. All materials must be disposed of in a Class I landfill and manifest as Category I Non-Friable Asbestos containing material.

To meet the requirements of a wet demolition, it is the responsibility of the demolition contractor to control any visible emissions by adequately applying water on the structure. Furthermore, the work practices for the demolition of a building containing asbestos must be in regulatory compliance with OSHA 1926.1101. All materials must be kept thoroughly wet or saturated during the demolition to assist in preventing the release of asbestos fibers. A certified asbestos supervisor must perform or supervise the work. If, during the demolition process, visible emissions are observed, the asbestos-containing materials must then be abated.

The regulations of the Occupational Safety and Health Administration (OSHA) applies to any detectable amount of asbestos in building materials or on facility components. This requirement covers worker training, work practices, and disposal methods. In summary, removing asbestos in a commercial setting requires training, specific work practices, and disposal methods for the asbestos and asbestos-containing debris.

However, if Category I Materials have become friable or are in poor condition, they must be removed before demolition or renovation begins by a Florida Licensed Asbestos Abatement Contractor. When implementing the response actions, parties responsible for final selection should remember that actions shall be sufficient to protect human health and the environment, but may also be the least burdensome method. Nothing in these recommendations should be construed as prohibiting or discouraging removal.



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• Site Investigations/Assessments • Indoor Air Quality Testing • Monitoring • Radon Gas Measurements • Chemical Exposure Monitoring

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Prepared For:
Lindsay Fitzpatrick
Demolition Gods

Job Site:
Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169

	Description and Location	Approximate Size	Material Class	Physical Condition	Water Damage	Material Contact	Material Friability	Cat
Sample 35	Mirror Mastic; Black Behind 340 square feet of mirrors in units 119 & 127 and unit 207 living rooms.	12 sq. ft.	Miscellaneous	Good	None	None	High	Non-friable I
							Asbestos Detected	
Sample 36	Mirror Mastic; Black Behind 340 square feet of mirrors in units 119 & 127 and unit 207 living rooms.	Included Above	Miscellaneous	Good	None	None	High	Non-friable I
							Asbestos Detected	

The following nonsuspect materials were observed during this survey. No samples were taken: carpet, a/c duct, fiberglass, glass, metal, wood, wood flooring. Rubberized caulking around the windows. A/C duct fiberglass insulation observed. Fiberglass insulation observed behind walls.

The job site was not occupied at the time of the inspection.

Lab Results



ARS Environmental

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Prepared For:
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 Demolition Gods

Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
1	Popcorn		5% cellulose	95%
2	Popcorn			100%
3	Popcorn			100%
4	Popcorn			100%
5	Popcorn			100%
6	Popcorn			100%
7	Popcorn		5% cellulose	95%
8	Popcorn			100%
9	Popcorn			100%
10	Popcorn			100%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Ma
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



ARS Environmental

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Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
11	Drywall/Joint Compound		30% cellulose 10% glass	60%
12	Drywall/Joint Compound		30% cellulose 10% glass	60%
13	Drywall/Joint Compound		30% cellulose 10% glass	60%
14	Drywall/Joint Compound		30% cellulose 10% glass	60%
15	Drywall/Joint Compound		30% cellulose 10% glass	60%
16	Drywall/Joint Compound		30% cellulose 10% glass	60%
17	Drywall/Joint Compound		30% cellulose 10% glass	60%
18	Drywall/Joint Compound		30% cellulose 10% glass	60%
19	Drywall/Joint Compound		30% cellulose 10% glass	60%
20	Drywall/Joint Compound		30% cellulose 10% glass	60%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Ma
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



ARS Environmental

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Job Site:
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 395 NW 177th Street
 Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
21	Concrete			100%
22	Concrete			100%
23	Concrete			100%
24	Concrete			100%
25	Concrete			100%
26	Concrete			100%
27	Concrete			100%
28 A	Floor Tile			100%
28 B	Mastic		10% cellulose 10% synthetic	80%
29 A	Floor Tile			100%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Ma
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
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Job Site:
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Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
29 B	Mastic		10% cellulose 10% synthetic	80%
30 A	Floor Tile			100%
30 B	Mastic		10% cellulose 10% synthetic	80%
31 A	Floor Tile			100%
31 B	Mastic		10% cellulose 10% synthetic	80%
32 A	Floor Tile			100%
32 B	Mastic		10% cellulose 10% synthetic	80%
33 A	Floor Tile			100%
33 B	Mastic		10% cellulose 10% synthetic	80%
34 A	Floor Tile			100%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Ma
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



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• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
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Job Site:
 Apartment Building
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 Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
34 B	Mastic		10% cellulose 10% synthetic	80%
35	Mastic	5% chrysotile	10% cellulose	85%
36	Mastic	8% chrysotile	10% cellulose	82%
37	Concrete			100%
38	Concrete			100%
39	Concrete			100%
40	Concrete			100%
41	Concrete			100%
42	Concrete			100%
43	Concrete			100%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Materials
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per cent asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
 • Site Investigations/Assessments • Indoor Air Quality Testing • Monitoring • Radon Gas Measurements • Chemical Exposure Monitoring

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 Demolition Gods

Job Site:
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 Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
44	Concrete			100%
45	Concrete			100%
46	Concrete			100%
47	Concrete			100%
48	Concrete			100%
49	Concrete			100%
50	Concrete			100%
51	Membrane		40% cellulose 30% glass	30%
52	Membrane		40% cellulose 30% glass	30%
53	Flashing		40% cellulose 30% glass	30%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Materials
 APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst

Lab Results



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
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Job Site:
Apartment Building
395 NW 177th Street
Miami Gardens, FL 33169

Sample/Layer	Description and Location	Estimated Asbestos Percentage	Percentage of Nonasbestos Fibers	Percentage of Nonfibrous Materials
54	Flashing		40% cellulose 30% glass	30%

EPA 600/R-93 116 Method for the Determination of Asbestos in Bulk Building Ma
APPLICABILITY: this method is useful for the qualitative identification of asbestos and the quantitative determination of asbestos content of bulk samples. The method measures per asbestos as perceived by the analyst.

Alex Front, Analyst



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
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Prepared For:
 Lindsay Fitzpatrick
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Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Chain of Custody Forms

ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
ARS Environmental, Inc., 151 N. Nob Hill Rd., #462, Plantation, FL 33324, Phone 954-227-3402

Sampling Date: 9-25-23

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround: Same Day 24 Hour 48 Hour 72 Hour

Areas Surveyed: Interior Exterior Roof Occupied

Transferred By: Ariel M. Hamilton Date: 9-25-23 Received By: [Signature] Date: 9/25/23

Non Suspect Materials Observed:
 Carpet Terrazzo
 A/C Duct Wood
 Fiberglass Window Mounted A/C
 Glass Rubberized Roofing
 Metal Wood Flooring
 Rubber Marble Flooring
 Rubberized Caulking Around Windows

Job Site: FIRE DAMAGED APARTMENT Bldg.
395 N.W. 177th ST.
MIAMI GARDENS, FL

Page 1 of 6

Mirrors Not Broken Due to Occupancy AC duct fiberglass insulation observed
 Fire Doors for Demolition Sampled Fiberglass insulation observed behind walls

Sample No.	Layer	Material Class	Membership - M Substituting Material - S Thermal System Insulation - T	Bldg/Floor/ Unit	Location	Approx Size In Sq. Ft. or Lt. Ft.	Dist. of				F or 10'	
							Cont.	Page Dist.	Water Dist.	Relative Corrosion		
1	S	SPRAYED APPLIED CEILING TEXTURE			THROUGHOUT BUILDING CEILING, SURFACE.	12,986'	G	N	N	L	F	
2	S	u	q		u	q	IA	G	N	N	L	F
3	S	u	q		u	q	IA	G	N	N	L	F
4	S	u	q		u	q	IA	G	N	N	L	F
5	S	u	q		u	q	IA	G	N	N	L	F
6	S	u	q		u	q	IA	G	N	N	L	F
7	S	u	q		u	q	IA	G	N	N	L	F
8	S	u	q		u	q	IA	G	N	N	L	F
9	S	u	q		u	q	IA	G	N	N	L	F
10	S	u	q		u	q	IA	G	N	N	L	F



ARS Environmental

• Environmental Testing Services • Asbestos Surveys • Hazardous Building Material Surveys • Mold Assessments • Lead Inspections
 • Site Investigations/Assessments • Indoor Air Quality Testing • Monitoring • Radon Gas Measurements • Chemical Exposure Monitoring

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Prepared For:
 Lindsay Fitzpatrick
 Demolition Gods

Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Chain of Custody Forms

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ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
ARS Environmental, Inc. 151 N Nob Hill Rd, #462, Plantation, FL 33324. Phone 954-227-0402

Sampling Date: 9-25-23

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround:
 Same Day
 24 Hour
 48 Hour
 72 Hour

Areas Surveyed:
 Interior
 Exterior
 Roof
 Occupied

Non Suspect Materials Observed:
 Carpet
 AC Duct
 Fiberglass
 Glass
 Metal
 Rubber
 Rubberized Caulking Around Windows
 Terrazzo
 Wood
 Window Mounted AC
 Rubberized Roofing
 Wood Flooring
 Marble Flooring

Job Site: FIVE DAMAGED APARTMENT Bldg.
395 N.W. 177th ST.
MIAMI GARDENS, FL

Mirrors Not Broken Due to Occupancy:
 Fire Doors for Demolition Sampled:
 AC duct fiberglass insulation observed:
 Fiberglass insulation observed behind walls:

Transferred By: Ariel M. Hamilton Date: 9-25-23 Received By: _____ Date: _____

Sample No.	Layer	Material Class	Sample Description	Bldg/Floor/Unit	Location	Approx Size In Sq. Ft. or Ln. Ft.	Good/Fair/Poor	Yes/None/No	Yes/None/No	None/High/Low/Right	F or HF
11	S		Wallboard/joint compounds.		throughout building ceilings, partitions and perimeter walls.	29,169'	F	Y	Y	H	F
12	S		" "			IA	F	Y	Y	H	F
13	S		" "			IA	F	Y	Y	H	F
14	S		" "			IA	F	Y	Y	H	F
15	S		" "			IA	F	Y	Y	H	F
16	S		" "			IA	F	Y	Y	H	F
17	S		" "			IA	F	Y	Y	H	F
18	S		" "			IA	F	Y	Y	H	F
19	S		" "			IA	F	Y	Y	H	F
20	S		" "			IA	F	Y	Y	H	F



ARS Environmental

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 • Site Investigations/Assessments • Indoor Air Quality Testing • Monitoring • Radon Gas Measurements • Chemical Exposure Monitoring

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Prepared For:
 Lindsay Fitzpatrick
 Demolition Gods

Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Chain of Custody Forms

ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
 ARS Environmental, Inc. • 101 N Nob Hill Rd, #462, Plantation, FL 33324, Phone (954) 227-2402

Sampling Date: 9-25-23

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround:
 Same Day
 24 Hour
 48 Hour
 72 Hour

Areas Surveyed:
 Interior
 Exterior
 Roof
 Occupied

Transferred By: Ariel Hamilton Date: 9-25-23 Received By: [Signature] Date: 9/25/23

Non Suspect Materials Observed:
 Carpet
 A/C Duct
 Fiberglass
 Glass
 Metal
 Rubber
 Rubberized Caulking Around Windows
 Terrazzo
 Wood
 Window Mounted A/C
 Rubberized Roofing
 Wood Flooring
 Marble Flooring

Job Site: FIRE DAMAGED APARTMENT Bldg.
395 N.W. 177th ST.
MIAMI GARDENS, FL

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Y N
 AC duct fiberglass insulation observed
 Fiberglass insulation observed behind walls

Sample No.	Layer	Material Class	Sample Description	Bldg/Floor/Unit	Location	Approx Size In Sq. Ft. or Ln. Ft.	Good-If-Found					
							Cont.	Fiber	State	Material	Phase	Remarks
21	M		CERAMIC TILE GROUT		Throughout Building floors between and under tiles.		G	N	N	H	NF	
22	M		u u		u u	IA	G	N	N	H	NF	
23	M		u u		u u	IA	G	N	N	H	NF	
24	M		u u		u u	IA	G	N	N	H	NF	
25	M		u u		u u	IA	G	N	N	H	NF	
26	M		u u		u u	IA	G	N	N	H	NF	
27	M		u u		u u	IA	G	N	N	H	NF	
28	M		1X1 BEIGE PEEL AND STICK AND MASTIC.		Throughout kitchen + passage way of 1/2, bedrooms of unit 208, kitchen of unit 238, and unit 129 floor, and unit 105 floor.	933'	G	N	N	H	NF	
29	M		u u		u u	IA	G	N	N	H	NF	
30	M		u u		u u	IA	G	N	N	H	NF	



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Prepared For:
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Job Site:
 Apartment Building
 395 NW 177th Street
 Miami Gardens, FL 33169

Chain of Custody Forms

ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
 ARS Environmental, Inc. 101 N. Nob Hill Rd., Plantation, FL 33324 • Phone 954-227-2402

Sampling Date: 9-25-23 Job Site: FIRE DAMAGED APARTMENT Bldg.
395 N.W. 177th ST.
MIAMI GARDENS, FL

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround: Same Day 24 Hour 48 Hour 72 Hour

Areas Surveyed: Interior Exterior Roof Occupied

Transferred By: Ariel M. Hamilton Date: 9-25-23 Received By: [Signature] Date: 9/25/23

Non Suspect Materials Observed:
 Carpet Terrazzo A/C Duct Wood Fiberglass Window Mounted A/C Glass Rubberized Roofing Metal Wood Flooring Rubber Marble Flooring Rubberized Caulking Around Windows

Mirrors Not Broken Due to Occupancy: Y N
 Fire Doors for Demolition Sampled: Y N
 A/C duct fiberglass insulation observed
 Fiberglass insulation observed behind walls

Sample No.	Layer	Material Class	Sample Description	Bldg/Floor/Unit	Location	Approx. Size In Sq. Ft. or Lt. Ft.	Test Results					
							Lead	Asbestos	PCB	Mercury	PCDD/F	PAHs
31	M	1X1 BROWN PEEL AND STICK AND MASTIC			Throughout water heater closet of unit 109.	9'	G	N	N	H	NF	
32	M	1X1 BLACK PEEL AND STICK AND MASTIC.			Throughout unit 205 floor edge pt. living room and bedroom, and throughout maintenance room floor.	886'	G	N	N	H	NF	
33	M	" "			" "	1A	G	N	N	H	NF	
34	M	" "			" "	1A	G	N	N	H	NF	
35	M	Black Mirror Mastic			Behind 490 square feet of mirrors in units 119, 127 and unit 207, living rooms.	12'	G	N	N	H	NF	
36	M	" "			" "	1A	G	N	N	H	NF	
37	M	Ceramic tiles grout.			Throughout laundry room floor between and under files.	364'	G	N	N	H	NF	
38	M	" "			" "	1A	G	N	N	H	NF	
39	M	" "			" "	1A	G	N	N	H	NF	
40	M	" "			" "	1A	G	N	N	H	NF	



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Job Site:
 Apartment Building
 395 NW 177th Street
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Chain of Custody Forms

ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
 ARS Environmental, Inc. 151 N Nob Hill Rd, #462, Plantation, FL 33324, Phone (954) 227-2402

Sampling Date: 9-25-23

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround: Same Day 24 Hour 48 Hour 72 Hour

Areas Surveyed: Interior Exterior Roof Occupied

Transferred By: Ariel M. Hamilton Date: 9-25-23 Received By: AF Date: 9/25/23

Non Suspect Materials Observed:
 Carpet Terrazzo
 A/C Duct Wood
 Fiberglass Window Mounted A/C
 Glass Rubberized Roofing
 Metal Wood Flooring
 Rubber Marble Flooring
 Rubberized Caulking Around Windows

Job Site: FIRE DAMAGED APARTMENT Bldg.
395 N.W. 177th ST.
MIAMI GARDENS, FL

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Mirrors Not Broken Due to Occupancy
 Fire Doors for Demolition Sampled
 AC duct fiberglass insulation observed
 Fiberglass insulation observed behind walls

Sample No.	Layer	Material Class	Sample Description		Bldg/Floor/Unit	Location	Approx. Size In Sq. Ft. or Ln. Ft.	Good-G	Yes	Yes-T	None-H	F or NF
			Miscellaneous - M	Ducting Material - U								
41	M		INTERIOR/EXTERIOR CONCRETE STRUCTURE			THROUGHOUT BUILDING FLOOR SLABS, PARTITIONS and PERIMETER WALLS.		G	N	N	H	NF
42	M		u	u			IA	G	N	N	H	NF
43	M		u	u		u u	IA	G	N	N	H	NF
44	M		u	u		u u	IA	G	N	N	H	NF
45	M		u	u		u u	IA	G	N	N	H	NF
46	M		u	u		u u	IA	G	N	N	H	NF
47	M		u	u		u u	IA	G	N	N	H	NF
48	M		u	u		u u	IA	G	N	N	H	NF
49	M		u	u		u u	IA	G	N	N	H	NF
50	M		u	u		u u	IA	G	N	N	H	NF



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Chain of Custody Forms

ASBESTOS WORKSHEET (CHAIN OF CUSTODY)
 ARS Environmental, Inc. 151 N. Nob Hill Rd. #462, Plantation, FL 33324, Phone (954) 227-2402

Sampling Date: 9-25-23

Samples Taken By: Ariel Hamilton

Project Number: 2023-2277

Turnaround: Same Day 24 Hour 48 Hour 72 Hour

Areas Surveyed: Interior Exterior Roof Occupied

Transferred By: Ariel Hamilton Date: 9-25-23 Received By: AY Date: 9/25/23

Non Suspect Materials Observed:
 Carpet Terrazzo
 A/C Duct Wood
 Fiberglass Window Mounted A/C
 Glass Rubberized Roofing
 Metal Wood Flooring
 Rubber Marble Flooring
 Rubberized Caulking Around Windows

Job Site: FIRE DAMAGED APARTMENT BLDG.
395 N.W. 177th ST.
MIAMI GARDENS, FL

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Mirrors Not Broken Due to Occupancy Y N
 Fire Doors for Demolition Sampled AC duct fiberglass insulation observed
 Fiberglass insulation observed behind walls

Sample No.	Layer	Material Class	Sample Description	Bldg/Floor/Unit	Location	Approx. Size In Sq. Ft. or Ln. Ft.	Search	Test	Phase	Notes	Other	Other
							Class	Class	Class	Class	Class	Class
51	M	ROOF MATERIAL - MEMBRANE			OVER BUILDING	9,793'	F	Y	N	L	N	F
52	M	" "			" "	IA	G	Y	N	L	N	F
53	M	ROOF MATERIAL - FLASHING			OVER BUILDING ALONG PERIMETER	793'	G	N	N	L	N	F
54	M	" "			" "	IA	G	N	N	L	N	F



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Lindsay Fitzpatrick
Demolition Gods

Job Site:
Apartment Building
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Miami Gardens, FL 33169

TERMS AND CONDITIONS

Scope of Work

ARS Environmental, Inc. inspections are limited and non-destructive in nature. Any conditions or materials which were not able to be visually observed on the surface, or in easily accessible areas, were not inspected and may differ from those observed. It was not within the scope of this investigation to remove surface materials to investigate portions of the structure or materials which lay beneath the surface. Our selection of sample locations and frequency is based upon our observations and the assumption that like materials in the same area are homogeneous. This inspection report is the result of a diligent search of the facility for Asbestos Containing Building Materials (ACBM). The purpose of this inspection was to identify those materials which may pose a health hazard to occupants of a building and impart future liability to the owners and insurers of the property. However, we do not claim to have identified all of the asbestos containing building materials present in the facility. Materials such as underground pipes, any material inside walls, ceilings, floors, or other enclosed and inaccessible areas were not sampled and are not covered in this report. This report is designed to aid the building owner, architect, construction manager, general contractor, and potential asbestos abatement contractor in locating asbestos containing building materials. Under no circumstances is this report to be utilized as a proposal or a project specification document. This report is based upon conditions and practices observed at the property and information made available to the surveyor. This report does not intend to identify all hazards or unsafe practices, nor to indicate that other hazards or unsafe practices do not exist at the premises. In the event that demolition or renovation is deemed necessary, parties shall comply with all applicable laws, ordinances, rules, and regulations of federal, state, and local governmental agencies, including any National Emissions Standard Hazardous Air Pollutants (NESHAP) notification requirements.

Right of Entry

The client will provide for right of entry to ARS Environmental, Inc. personnel in order to complete the above referenced work.

Invoices

ARS Environmental, Inc. will submit invoices to client upon completion of services.

Ownership of Documents

All reports, field data, field notes, laboratory tests data, calculations, estimates, and any other



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Demolition Gods

Job Site:
Apartment Building
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documents prepared by ARS Environmental, Inc. as instruments of service shall remain the property of ARS Environmental, Inc..

Assumptions and Limitations

The results, findings, conclusions, and recommendations expressed in this report are based only on conditions which were observed during inspections by this report. ARS Environmental, Inc. makes no representation or assumptions as to past conditions or future occurrences.

Assigns

Neither the client nor ARS Environmental, Inc. may delegate, assign, sublet or transfer his duties or interest in this agreement without the written consent of the other party.

Roof Cuts

To obtain accurate information in a roof investigation, roof cuts approximately four inch (4") squares, may be deemed necessary. It is the responsibility of our client to make appropriate repairs to these roof cuts, using materials consistent with the roofing system and in accordance with any existing material manufacturer's warranties. A roofing contractor or maintenance personnel selected by our client should be on the roof to make any necessary repairs at the time the samples are being obtained. Although, every attempt will be made to make these repaired areas water tight, ARS Environmental, Inc. will in no way be responsible for any water damage to the roofing system, building, or it's contents resulting from ARS Environmental, Inc. temporary repairs.

Disclaimer

If in the course of a renovation or demolition activity, suspect materials become exposed, All further activity should immediately cease and the status of the material should be determined before proceeding.

Exhibit C

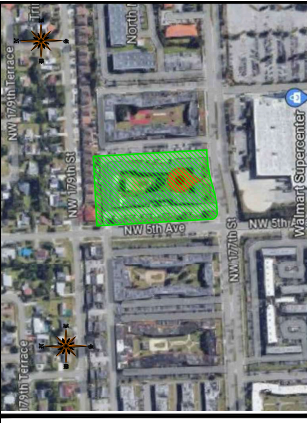


Exhibit D

NOTICE OF COMMENCEMENT

(A RECORDED COPY MUST BE POSTED ON THE JOB SITE AT TIME OF FIRST INSPECTION)

NOTICE OF COMMENCEMENT MUST BE FILED
IF THE JOB VALUATION IS \$ 2,500.00 OR MORE IN LABOR AND MATERIAL.
PLEASE FILE AT 22 NW 1ST STREET, 1ST FLOOR, MIAMI, FLORIDA (305) 275-1155

Permit Number: _____ Tax Folio Number: SEE ATTACHMENT

State of Florida

County of Miami-Dade

THE UNDERSIGNED hereby gives notice that improvements will be made to certain real property, and in accordance with Chapter 713, Florida Statute, the following information is provided in this Notice of Commencement.

1. Legal description of property and street address: 395 NW 177 St Miami FL 33169
New world Condo Apartments 1

2. Description of improvement: Demolition of total structure

3. Owner's name and address: Receiver's David M. Gersten, as Receiver for
New world Condominiums Apartments Condominiums Ass'n, Inc.,
1000 Brickell Ave., suite 1020, Miami, FL 33131

Interest in property: Receiver is acting pursuant to court order and section 12.16 of the
Declaration of Condominium (off. rec. 17301, Pg. 1687)

Name and address of fee simple titleholder: Home Owners Association
New world Condo. Apts. Condo. Ass'n, Inc., 1000
Brickell Ave., Suite 1020, Miami, FL 33131

4. Contractor's name and address: Demolition trades, LLC 7533 Roosevelt St Hollywood FL
33024

5. Surety: (Payment bond required by owner from contractor)

Name and address: _____

Amount of Bond: \$ _____

6. Lender's name and address: _____

7. Persons with the State of Florida designed by Owner upon whom notices or other documents may be served as provided by Section 713.13(1) (a) 7, Florida Statute:

Name and address: _____

8. In addition to himself/herself, Owner designates the following permit(s) to receive a copy of a Lienor's Notice as provided in Section 713.13(1) (b), Florida Statute:

Name and address: _____

9. Expiration date of Notice of Commencement: (the expirations date is one (1) year from the date of recording unless a different date is specified)

(Signature of Owner)
Receiver's

Print Owner's Name: David M. Gersten, as Receiver

Sworn to and subscribed before me this and
Day of, October, 20 23

Personally Know, or
 Produced Identification
 Oath taken

Oath Not Taken

Prepared by: _____

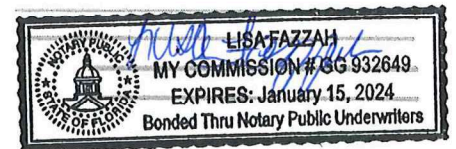
Address: _____

Notary Public: _____

Print Notary's Name: _____

Commission Expires: _____

SEAL:



Composite Exhibit E



City of Miami Gardens

Development Services - Building Services
11605 NW 27th Avenue, City Hall, 1st Floor
Miami Gardens, FL 33056
305-622-8027 (Office) 305-626-4220 (Fax)
www.miamigardens-fl.gov

FOR OFFICE USE ONLY

Process No. _____
Date Applied _____
Clerk _____
Date Issued _____

PERMIT APPLICATION

Applied for under: **FLORIDA BUILDING CODE**

Location of Improvements: (USE BLACK OR BLUE INK ONLY)

Job Site Address: 395 NW 177 St Master Permit No. _____
 Building No.: 1 Suite No. _____ Tax Folio No.: SEE ATTACHED
 Lot _____ Block _____ Subdivision: NEW WORLD CONDO PB Page: _____
 Current Use: Residential Proposed Use _____

HOA Property
Property Owner Information:
 Name: NEW WORLD CONDO APPTS 1 Address: 395 NW 177 St
 City: Miami State: FL Zip Code: 33109
 Telephone: _____ Work: _____ Email: _____

Reliever #
Licensee Information/Owner's Agent:
 Name: David M. Weisten, a Reliever Address: 1000 Brickell Ave., suite 1020
 City: Miami State: FL Zip Code: 33131
 Telephone: _____ Work: _____ Email: MDAMAN@DUVLP.COM

Contractor Information:
 Name: Demolition Goods, LLC License No: 22B500412
 Address: 3533 Roosevelt St Qualifier's Name: Catherine Hamann
 City: Hollywood State: FL Email: office@demolitiongoods.com
 Telephone: 954-822-3353 Fax: _____ Zip Code: 33024
 Other Telephone: _____

Information of Authorized Person to Pick up Permit:
 Name: Lindsay Fitzpatrick Address: 3533 Roosevelt St
 City: Hollywood State: FL Zip Code: 33024
 Telephone: 954-822-3353 Work: _____ Email: _____

Type of Improvement (Detailed Scope of work):
Total Demolition of structure

Zoning _____ Construction Cost: _____ Construction Type: _____
 Square Feet _____ Lineal Feet: _____ Group Occupancy: _____
 No. of Units: 09 No. of Floors: 2 Gallons: _____ Building Height: _____

RESIDENTIAL (R) COMMERCIAL (C) MULTI-FAMILY (M)

Building Permit Electrical Permit Mechanical Permit Plumbing Permit Change of Contractor/Architect/Engineer

Awning Canopies Parking Lots Signs Fences Boiler Install Change of Qualifier

Commercial Swimming Pools Slabs Electric Services Fire Sprinklers Re-Certification of Plans

Demolition Residential Temp Work Electric System Settling Tanks Revision of Plans

Fence Roof Temp Trailers Temp Services Water Treatment Plants Permit Renewal

Gutters Shields Windows Doors A/C & Refrig. Other: _____

Architect Information:
 Name: _____ Address: _____ License No: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____ Fax: _____ Email: _____

Engineer Information:
 Name: _____ Address: _____ License No: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____ Fax: _____ Email: _____

Flood Criteria

Flood Zone _____ UFE _____ Map # _____ Dam # _____

Property Market Value	Construction Job Value	Improvement Return	Square Footage	Bottom of Lowest Structural Horizontal Member Elevation

ALL FIELDS MUST BE FILLED IN OR APPLICATION WILL BE DENIED PROCESS
Revised 04/04/2023

* The Reliever is acting pursuant to the February 7, 2023 Court order (Case No. 2023-001716-CA-01) and section 12.16 of the declaration of condominium (off. Rec. 17301, page 16 of 87)

ATTENTION ♦ IMPORTANT NOTICE - PLEASE READ CAREFULLY ♦ ATTENTION

A NOTICE OF COMMENCEMENT MUST BE RECORDED WHEN JOB VALUE EXCEEDS \$ 1,500.00. PERMIT CARD, PLANS AND THE RECORDED NOTICE OF COMMENCEMENT MUST BE VISIBLY POSTED, IN GOOD CONDITION AND ACCESSIBLE AT ALL TIMES ON THE JOBSITE.

Work may begin only after receiving a validated permit and permit card. Application submission alone does not grant the right to begin construction

Qualifier's Affidavit: Application is hereby made to obtain a permit to do work and installation as indicated on the form. I certify that all work will be performed to meet the standards of all laws regulating construction in this jurisdiction. I understand that separate permits are required for ELECTRICAL, PLUMBING, POOL, EXTERIOR DOOR, MECHANICAL WINDOW, FENCE, DRIVEWAY, ROOFING AND SIGN(S) WORK, and that additional permits may be required by other government agencies.

Lessee's Affidavit: Lessee certifies that he/she has full consent and authorization from the owner of subject property to perform the work mentioned and to hire captioned contractor.

Owner's Affidavit: I certify that the forgoing information is correct. Owner certifies that the aforementioned contractor has the authorization to perform the work as specified.

Owner-Builder's Hold Harmless: (ONLY VALID FOR OWNER-BUILDER PERMITS)

- _____ I am personally responsible for knowledge of all applicable laws and regulations.
- _____ I will personally reside in the house after completion and have issuance of a Certificate of Occupancy.
- _____ Neither I, nor any member of my immediate household family, have made an application for, or have been issued either an Owner-Builder permit or Certification of Occupancy based on an Owner-Builder permit for a single family residence within the past three (3) years.
- _____ I will be on the premises either supervising or performing the action work at all times. I will submit an accepted form of identification upon request by the Building Department's agent.
- _____ I understand that if an inspection is not approved after three (3) attempts, the Inspector may place a Stop Work Order on the job, and require that a licensed contractor complete the work.
- _____ I understand that any person whom I may wish to hire to aid me in the construction of my home, except common laborers, must hold a valid Dade County Certificate of Competency or be a State Certified contractor. All employees hired by me shall be covered by Workers Compensation Insurance. (Typically home-owner's insurance does not provide this coverage, please check with you insurance carrier.)
- _____ I understand all the requirements and responsibilities involved in obtaining an owner-builder permit.

I, have read and understood the forgoing disclosure, and am aware of my responsibilities and liabilities under my application for a building construction work on the described property. I further understand that failure to comply with all the required regulations may cause the revocation and/or denial of the permit and/or certificate of occupancy.

NOTICE TO ALL CONSTRUCTION PLANS APPLICANTS

Certain applications for construction activities within this jurisdiction require other permits from the state for storm water management purposes. If your project includes two acres or more of impervious area, you will need an Environmental Resource Permit (ERP). In Miami Dade County, this ERP is issued by the Regulatory and Economic Resources (RER) Division of DERM, unless wetlands are involved. If wetlands are part of the permit, the South Florida Water Management District will review and issue the ERP.

RER can be reached at 305.372.6789.

The South Florida Water Management District can be reached at 800.432.2045

If your project disturbs one or more acres of land, you will need a Construction Generic Permit (CGP) from the State Department of Environmental Protection (DEP). This Permit is part of the rules governing the National Pollutant Discharge Elimination System (NPDES).

DEP can be reached toll free at 866.336.6312. Email: NPDES-stormwater@dep.state.fl.us

Notarized Signature of Property Owner/Agent

Reverent
Melanie Damian Falkbauer
Reverent

Printed Name of Property Owner/Agent

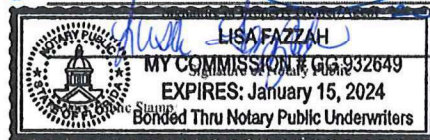
State of Florida, County of Miami -Dade

Sworn and subscribed to me this:

10 / 2 / 2023
Month Day Year

Personally Known or Identification:

(Type of ID and expiration date)



Notarized Signature of Lessee

Printed Name of Property Lessee

State of Florida, County of Miami -Dade

Sworn and subscribed to me this:

_____/_____/_____
Month Day Year

Personally Known or Identification:

(Type of ID and expiration date)

Signature of Property Lessee

Signature of Notary Public

Notary Public Stamp.

Notarized Signature of Qualifier/Owner-Builder

Printed Name of Property Qualifier

State of Florida, County of Miami -Dade

Revis Sworn and subscribed to me this:

_____/_____/_____
Month Day Year

Personally Known or Identification:

(Type of ID and expiration date)

Signature of Property Qualifier

Signature of Notary Public

Notary Public Stamp.

ALL FIELDS MUST BE FILLED IN OR APPLICATION WILL BE DENIED PROCESS

Revised 04/04/2023

**The Reverent is acting pursuant to the February 7, 2023 court order (Case No. 2023-00716-(A-01) and section 12.16 of the declaration of condominium (off. Rec. 17301, page 1687)*



City of Miami Gardens

Development Services - Building Services
18605 NW 27th Avenue, City Hall, 1st Floor
Miami Gardens, FL 33056
www.miamigardens-fl.gov

OWNER-BUILDER DISCLOSURE STATEMENT

The laws governing the State of Florida provide that a sole qualified owner may make application for a permit, provided the work under said permit is exclusively for the owner's occupancy and use. No more than one permit will be issued, to an owner-builder in a twelve (12) month period for a new Single Family Residence. The law requires that we provide you with the following disclosure statement:

State law requires construction to be done by licensed contractors. You have applied for a permit under an exemption to that law (F.R.S. 489.103.) The exemption allows you, as the owner, of your property, to act as your own contractor with certain restrictions even though you do not have a license. You must provide direct, onsite supervision of the construction yourself. You may build, or improve a one-family or two-family residence. You may also build or improve a commercial building at a cost of \$75,000.00 or less.

The building must be for your own use and occupancy. It may not be built or substantially improved for sale or lease. If you sell or lease a building you have built or substantially improved yourself within one (1) year after the construction is completed, the law will presume that you have built it for sale or lease, which is a violation of the exemption. You may not hire an unlicensed person to act as your contractor or subcontractor or to supervise people working on your building. It is your responsibility to make sure that people employed by you have the licenses required, by state law and by county and municipal ordinance. You may not delegate the responsibility for supervising work to a licensed contractor who is not licensed to perform the work being done. Any person working on your building who is not licensed, must work under your supervision and must be employed by you, which means you must deduct FICA and withholding tax and provide workers' compensation for that employee, all as prescribed by law. Your construction must comply with all applicable laws, ordinances, 2020 Florida Building Code, and zoning regulations.

PROOF OF OWNERSHIP:

Legal description and name of document of proof must correspond to the name and legal description of the application. You must submit proof of ownership of the property concerned in the application as:

- * Recorded Quit Claim Deed;
- * Recorded Special Warranty Deed;
- * Recorded Warranty Deed;
- * Miami Dade County Tax Receipt;
- * For Commercial Properties a copy of lease, if applicable.

INSURANCE:

You should be advised that if your day labor employees cause any damage to persons or property, or if any of your day labor employees are injured on the job, **YOU ARE LIABLE**. Your regular home insurance policy ordinarily does not cover this type of liability.

DEMOLITION WORK:

In addition to meeting 2020 Florida Building Code requirements, you are responsible for disconnecting all utilities, including water, sewer, septic tank, electrical services, gas, telephone, cable TV, etc., prior to commencing demolition. You are also required to obtain a permit from the State of Florida Department of Health and Rehabilitation Services (DOH) in order to abandon any septic tank that is on the property.

NOTICE: SEPARATE PERMITS ARE REQUIRED FOR BUILDING, ELECTRICAL, SEPTIC TANK, PLUMBING, ROOFING AND MECHANICAL WORK

IMPORTANT NOTICE - Please Read

1. **Work may begin** only after receiving a validated permit and permit card. Applying of a permit does not grant the right to begin construction.
2. **The construction, demolition, alteration and/or repair of any building** shall take place between the hours of 7:00 a.m. to 8:00 p.m. on weekdays.
3. **All construction of demolition areas** must be maintained in a clean, neat and sanitary condition free from construction debris.
4. **Streets and neighboring properties** surrounding the construction site shall be kept free from dirt and debris.
5. **Swales** must be protected from being damaged by equipment or vehicles.
6. **Construction trailers** are prohibited on single-family residential construction sites. Other construction may have a trailer, which requires a separate permit.
7. Department of Health and Rehabilitative Services (HRS) approval is required for applications involving septic tanks. Department of Environmental Resource Management (DERM) and/or Miami-Dade Water and Sewer Department (MDWASA) approval is required for applications involving sewers.
8. **Portable toilets** for a construction site requires a separate permit.
9. **Do no discharge water** into the right of way or storm drains without approval from the Bldg. , Planning/Zoning Departments.
10. **Equipment and materials** shall be stored at least 10 feet from the edge of the right-of-way.
11. **Permit card, Permit and Plans** must be kept on site, be visible at all times, and be in good condition.
12. **Owner agents** must have an affidavit on file or one must be brought with the permit application
13. **Affidavit of Awareness of Condo/Homeowner's Association Regulation** must be submitted with the permit application.



City of Miami Gardens

Development Services - Building Services
18605 NW 27th Avenue, City Hall, 1st Floor
Miami Gardens, FL 33056
www.miamigardens-fl.gov

Affidavit of Awareness of Condo/Homeowners' Association Regulation

SUBMITTAL REQUIRED WITH APPLICATION

OWNER - Please provide a brief description of work: TOPPE Demolition of Structure

For office use ONLY - Job Type: _____

(Please Check One)

I, David M. Gersten, as Receiver, acknowledge that I am ^{the Receiver of} an owner/tenant in a condo/homeowners' association and that as ^{the Receiver} an owner/tenant of the association, I may be subject to additional building, landscaping or other regulations. I further understand that the issuance of a Building Permit by the City of Miami Gardens, Florida does not exempt me from any and all other regulations imposed by the governing association.

I, _____, am not an owner/tenant of a condo/homeowners' association.

395 NW 197 St

Job Address

Miami FL 33169

Job City, State & Zip Code

David M. Gersten, as Receiver

Receiver's Owner's Name *

New world Condo. Arts. Condo. Ass'n., Inc.

Name of Condo/Homeowners' Association

1000 Brickell Ave. Suite 1026

Mailing Address of Condo/Homeowners'

Miami, FL 33131

Condo/Homeowners' Association

City, State & Zip Code

<p>Notarized Signature of Property Owner/Tenant ^{Receiver} *</p> <p><u>Melina Danican</u></p> <p>Printed Name of Property Owner/Agent ^{Receiver}</p>	<p>Signature of Property Owner/Agent ^{Receiver}</p>
<p>State of Florida, County of Miami - Dade</p> <p>Sworn and subscribed to me this: <u>23</u></p> <p>Month Day Year</p> <p>10 2 23</p> <p>Personally Known or Identification:</p> <p>_____</p> <p>(Type of ID and expiration date)</p>	<p><u>Lisa Fazzari</u></p> <p>Notary Public</p> <p>MY COMMISSION # GG-932649</p> <p>EXPIRES: January 15, 2024</p> <p>Bonded Thru Notary Public Underwriters</p>

Revised 04/04/2023

*The Receiver is acting under the February 7, 2023 court order (case No. 2023-001710-CA-01) and section 12.16 of the declaration of Condominium (off. Rec. 17301, page 1687)



City of Miami Gardens

Development Services - Building Services
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Miami Gardens, FL 33056
305-622-8027 (Office) 305-626-4220 (Fax)
www.miamigardens-fl.gov

FOR OFFICE USE ONLY

Process No.: _____
Date Applied: _____
Clerk: _____
Date Issued: _____

PERMIT APPLICATION

Applied for under: _____ FLORIDA BUILDING CODE

Location of Improvements: (USE BLACK OR BLUE INK ONLY)

Job Site Address: 395 NW 177 ST Master Permit No.: _____
 Building No.: 1 Suite No.: _____ Tax Folio No.: SEE ATTACHED
 Lot: _____ Block: _____ Subdivision: NEW WORLD CONDO PB Page: _____
 Current Use: Residential Proposed Use: _____

Property Owner Information:

Name: New World Condo Apts Address: 395 NW 177 ST
 City: Miami State: FL Zip Code: 33169
 Telephone: _____ Work: _____ Email: _____

Receiver's * License Information/Owner's Agent:

Name: David M. Gershen, as Receiver Address: 1000 Brickell Ave, Suite 1020
 City: Miami State: FL Zip Code: 33131
 Telephone: _____ Work: _____ Email: MDAMIAN@DVL.P.COM

Contractor Information:

Name: Plum Dam Amazing, Inc License No.: _____
 Address: 1516 SW 29th Ave Qualifier's Name: _____
 City: Fort Lauderdale State: FL Email: _____
 Telephone: _____ Fax: _____ Zip Code: 33312
 Other Telephone: _____

Information of Authorized Person to Pick up Permit:

Name: _____ Address: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____ Work: _____ Email: _____

Type of Improvement (Detailed Scope of work):

CAP Sewer + install Hose Bib

Zoning: _____ Construction Cost: _____ Construction Type: _____
 Square Feet: _____ Lineal Feet: _____ Group Occupancy: _____
 No. of Units: 09 No. of Floors: 2 Gallons: _____ Building Height: _____

RESIDENTIAL (R) COMMERCIAL (C) MULTI-FAMILY (M)

Building Permit Electrical Permit Mechanical Permit Plumbing Permit Change of Contractor/Architect/Engineer

Awning Canopies Parking Lots Signs Feeders Boiler Install Change of Qualifier

Commercial Swimming Pools Slabs Electric Services Fire Sprinklers Re-Certification of Plans

Demolition Residential Temp Work Electric System Settling Tanks Revision of Plans

Fence Roof Temp Trailers Temp Services Water Treatment Plants Permit Renewal

Gutters Sheds Windows Doors A/C & Refrig. Other: _____

Architect Information:

Name: _____ Address: _____ License No.: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____ Fax: _____ Email: _____

Engineer Information:

Name: _____ Address: _____ License No.: _____
 City: _____ State: _____ Zip Code: _____
 Telephone: _____ Fax: _____ Email: _____

Flood Criteria

Flood Zone _____ B.F.E. _____ Map # _____ Date: _____

Property Market Value	Construction Job Value	Improvement Ratio	Square Footage	Bottom of Lowest Structural Horizontal Member Elevation

ALL FIELDS MUST BE FILLED IN OR APPLICATION WILL BE DENIED PROCESS

Revised 04/04/2023

* The Receiver is acting pursuant to the February 7, 2023 Court order (Case No. 2023-001716-CA-01) and Section 12.16 of the declaration of condominium (off. rec. 17301, page 1687)

ATTENTION ♦ IMPORTANT NOTICE - PLEASE READ CAREFULLY ♦ ATTENTION

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Lessee's Affidavit: Lessee certified that he/she has full consent and authorization from the owner of subject property to perform the work mentioned and to hire captioned contractor.

Owner's Affidavit: I certified that the forgoing information is correct. Owner certifies that the aforementioned contractor has the authorization to perform the work as specified.

Owner/Builder's Hold Harmless: (ONLY VALID FOR OWNER-BUILDER PERMITS)

_____ I am personally responsible for knowledge of all applicable laws and regulations

_____ I will personally reside in the house after completion and have issuance of a Certificate of Occupancy

_____ Neither I, nor any member of my immediate household family, have made an application for, or have been issued either an Owner-Builder permit or Certification of Occupancy based on an Owner-Builder permit for a single family residence within the past three (3) years.

_____ I will be on the premises either supervising or performing the action work at all times. I will submit an accepted form of identification upon request by the Building Department's agent.

_____ I understand that if an inspection is not approved after three (3) attempts, the Inspector may place a Stop Work Order on the job, and require that a licensed contractor complete the work.

_____ I understand that any person whom I may wish to hire to aid me in the construction of my home, except common laborers, must hold a valid Dade County Certificate of Competency or be a State Certified contractor. All employees hired by me shall be covered by Workers Compensation Insurance (Typically home-owner's insurance does not provide this coverage, please check with you insurance carrier.)

_____ I understand all the requirements and responsibilities involved in obtaining an owner-builder permit.

I, have read and understood the forgoing disclosure, and am aware of my responsibilities and liabilities under my application for a building construction work on the described property. I further understand that failure to comply with all the required regulations may cause the revocation and/or denial of the permit and/or certificate of occupancy.

NOTICE TO ALL CONSTRUCTION PLANS APPLICANTS

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RER can be reached at 305.372.6789.

The South Florida Water Management District can be reached at 800.432.2045

If your project disturbs one or more acres of land, you will need a Construction Generic Permit (CGP) from the State Department of Environmental Protection (DEP). This Permit is part of the rules governing the National Pollutant Discharge Elimination System (NPDES).

DEP can be reached toll free at 866.336.6312. Email: NPDES-stormwater@dep.state.fl.us

Notarized Signature of Property Owner/Agent

Receiver #
David M. Gersten
 Printed Name of Property Owner/Agent
 State of Florida, County of Miami-Dade
 Sworn and subscribed to me this: _____
 Month Day Year
 Personally Known or Identification _____
 (Type of ID and expiration date)

Signature of Property Owner/Agent

 Signature of Notary Public
LISA PIZZANI
 MY COMMISSION # GG 932649
 EXPIRES: January 15, 2024
 Bonded Thru Notary Public Underwriters

Notarized Signature of Lessee

 Printed Name of Property Lessee
 State of Florida, County of Miami-Dade
 Sworn and subscribed to me this _____
 Month Day Year
 Personally Known or Identification _____
 (Type of ID and expiration date)

 Signature of Property Lessee

 Signature of Notary Public

 Notary Public Stamp

Notarized Signature of Qualifier/Owner-Builder

 Printed Name of Property Qualifier
 State of Florida, County of Miami-Dade
 Sworn and subscribed to me this _____
 Month Day Year
 Personally Known or Identification _____
 (Type of ID and expiration date)

 Signature of Property Qualifier

 Signature of Notary Public

 Notary Public Stamp

ALL FIELDS MUST BE FILLED IN OR APPLICATION WILL BE DENIED PROCESS

Revised 04/04/2023

**Receiver is acting pursuant to a court order (case No. 2023-001716-CA-01) and section 12.16 of the declaration of condominium (off. rec. 17301, page 1687) the February 7, 2023*



City of Miami Gardens

Development Services - Building Services
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www.miamigardens-fl.gov

OWNER-BUILDER DISCLOSURE STATEMENT

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State law requires construction to be done by licensed contractors. You have applied for a permit under an exemption to that law (F.R.S. 489.103.) The exemption allows you, as the owner, of your property, to act as your own contractor with certain restrictions even though you do not have a license. You must provide direct, onsite supervision of the construction yourself. You may build, or improve a one-family or two-family residence. You may also build or improve a commercial building at a cost of \$75,000.00 or less.

The building must be for your own use and occupancy. It may not be built or substantially improved for sale or lease. If you sell or lease a building you have built or substantially improved yourself within one (1) year after the construction is completed, the law will presume that you have built it for sale or lease, which is a violation of the exemption. You may not hire an unlicensed person to act as your contractor or subcontractor or to supervise people working on your building. It is your responsibility to make sure that people employed by you have the licenses required, by state law and by county and municipal ordinance. You may not delegate the responsibility for supervising work to a licensed contractor who is not licensed to perform the work being done. Any person working on your building who is not licensed, must work under your supervision and must be employed by you, which means you must deduct FICA and withholding tax and provide workers' compensation for that employee, all as prescribed by law. Your construction must comply with all applicable laws, ordinances, 2020 Florida Building Code, and zoning regulations.

PROOF OF OWNERSHIP:

Legal description and name of document of proof must correspond to the name and legal description of the application. You must submit proof of ownership of the property concerned in the application as:

- * Recorded Quit Claim Deed;
- * Recorded Special Warranty Deed;
- * Recorded Warranty Deed;
- * Miami Dade County Tax Receipt;
- * For Commercial Properties a copy of lease, if applicable.

INSURANCE:

You should be advised that if your day labor employees cause any damage to persons or property, or if any of your day labor employees are injured on the job, **YOU ARE LIABLE**. Your regular home insurance policy ordinarily does not cover this type of liability.

DEMOLITION WORK:

In addition to meeting 2020 Florida Building Code requirements, you are responsible for disconnecting all utilities, including water, sewer, septic tank, electrical services, gas, telephone, cable TV, etc., prior to commencing demolition. You are also required to obtain a permit from the State of Florida Department of Health and Rehabilitation Services (DOH) in order to abandon any septic tank that is on the property.

NOTICE: SEPARATE PERMITS ARE REQUIRED FOR BUILDING, ELECTRICAL, SEPTIC TANK, PLUMBING, ROOFING AND MECHANICAL WORK

IMPORTANT NOTICE - Please Read

1. Work may begin only after receiving a validated permit and permit card. Applying of a permit does not grant the right to begin construction.
2. The construction, demolition, alteration and/or repair of any building shall take place between the hours of 7:00 a.m. to 8:00 p.m. on weekdays.
3. All construction of demolition areas must be maintained in a clean, neat and sanitary condition free from construction debris.
4. Streets and neighboring properties surrounding the construction site shall be kept free from dirt and debris.
5. Swales must be protected from being damaged by equipment or vehicles.
6. Construction trailers are prohibited on single-family residential construction sites. Other construction may have a trailer, which requires a separate permit.
7. Department of Health and Rehabilitative Services (HRS) approval is required for applications involving septic tanks. Department of Environmental Resource Management (DERM) and/or Miami-Dade Water and Sewer Department (MDWASA) approval is required for applications involving sewers.
8. Portable toilets for a construction site requires a separate permit.
9. Do no discharge water into the right of way or storm drains without approval from the Bldg. , Planning/Zoning Departments.
10. Equipment and materials shall be stored at least 10 feet from the edge of the right-of-way.
11. Permit card, Permit and Plans must be kept on site, be visible at all times, and be in good condition.
12. Owner agents must have an affidavit on file or one must be brought with the permit application.
13. Affidavit of Awareness of Condo/Homeowner's Association Regulation must be submitted with the permit application.



City of Miami Gardens

Development Services - Building Services
18605 NW 27th Avenue, City Hall, 1st Floor
Miami Gardens, FL 33056
www.miamigardens-fl.gov

Affidavit of Awareness of Condo/Homeowners' Association Regulation

SUBMITTAL REQUIRED WITH APPLICATION

OWNER - Please provide a brief description of work: Cap Sewer + Install Hose Bib.

For office use ONLY - Job Type: _____

(Please Check One)

I, David M. Gersten, as Receiver, acknowledge that I am ^{the Receiver of} ~~an owner/tenant~~ in a ^{the Receiver} ~~an owner/tenant~~ of the association, I may be subject to additional building, landscaping or other regulations. I further understand that the issuance of a Building Permit by the City of Miami Gardens, Florida does not exempt me from any and all other regulations imposed by the governing association.

I, _____, am not an owner/tenant of a condo/homeowners' association.

395 NW 177 St
Job Address

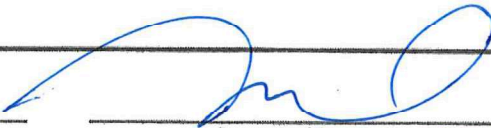
Miami FL 33169
Job City, State & Zip Code

David M. Gersten, as Receiver
~~Owner's Name~~ & Receiver's

New World Condo. Apts. Condo. Ass'n, Inc.
Name of Condo/Homeowners' Association

1000 Brickell Ave., Suite 1020
Mailing Address of Condo/Homeowners'

Miami, FL 33131
Condo/Homeowners' Association
City, State & Zip Code

Notarized Signature of ^{Receiver} Property Owner/Tenant <u>David M. Gersten</u> Printed Name of Property Owner/Agent Receiver		 Signature of Property Owner/Agent ^{Receiver}	
State of Florida, County of Miami -Dade Sworn and subscribed to me this: <u>10</u> / <u>2</u> / <u>2023</u> Month Day Year		 LISA FAZZAH MY COMMISSION # GG 932649 EXPIRES: January 15, 2024 Bonded Thru Notary Public Underwriters	
Personally Known or Identification _____ (Type of ID and expiration date)			

Revised 04/04/2023

*The Receiver is acting pursuant to the February 7, 2023 court order entered in Case No. 2023-001716-CA-01, and section 12.16 of the declaration of condominium (off. Rec. 17301, page 1687)

Exhibit F

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

VALTOM, LLC, a Florida Corporation,
Plaintiff,

CASE NO.: 2023-012984-CA-01

v.

PRESTIGE MANAGEMENT SOLUTIONS, INC., a
Florida corporation; NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM ASSOCIATION, a
Florida corporation; HERBERT TOUZALIN, an individual;
EMMA WILLIAMS, an individual; JAMES
SIMPSON, an individual; BETTY SCOTT, an individual; and
KAROL POLLARD, an individual,
Defendants.

NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

To: **Clerk of the Court**

Plaintiff, VALTOM, LLC, by and through its undersigned counsel, pursuant to Florida Rule of Civil Procedure 1.420, hereby voluntarily dismisses the above-styled cause without prejudice with all parties bearing their own attorney's fees and costs.

PRIETO LAW GROUP, PLLC
Attorneys for Plaintiff
101 N.E. 3rd Ave., Ste. 1500
Fort Lauderdale, FL 33301
(954) 332-3648 - Office

By: s/ Carlos A. Prieto
Carlos A. Prieto, Esq. for the firm
Fla. Bar No.: 114450
cprieto@prietolawgroup.com
For Service of Court Documents Only:
pleadings@prietolawgroup.com

DANIEL WAGNER, P.A.
Co-Counsel/Attorneys for Plaintiff
20807 Biscayne Blvd., Suite 201
Aventura, FL 33180
Tel: (305) 919-7788
Email: Daniel@danielwagnerlaw.com

BY: /s/ Daniel Wagner
DANIEL WAGNER, ESQ.
F.B.N 29788

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the Florida Courts e-Filing Portal sent via email transmission to all parties of record this 23rd day of May 2023.

By: s/ Carlos A. Prieto
Carlos A. Prieto, Esq. for the firm
Fla. Bar No.: 114450
101 N.E. 3rd Ave., Ste. 1500
Fort Lauderdale, FL 33301
(954) 332-3648 - Office

Exhibit G

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

FORTY YEAR INVESTMENTS, LLC,
a Florida Corporation,
Plaintiff,

CASE NO.: 2023-012973-CA-01

v.

PRESTIGE MANAGEMENT SOLUTIONS, INC., a
Florida corporation; NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM ASSOCIATION, a
Florida corporation; HERBERT TOUZALIN, an individual;
EMMA WILLIAMS, an individual; JAMES
SIMPSON, an individual; BETTY SCOTT, an individual; and
KAROL POLLARD, an individual,
Defendants.

**PLAINTIFF'S NOTICE OF DISMISSAL OF DEFENDANT
WITHOUT PREJUDICE**

COMES NOW the Plaintiff, FORTY YEAR INVESTMENTS, LLC, by and through the undersigned counsel, and gives notice of a voluntary dismissal of all Defendants in the above-styled action without prejudice, with each party to bear its own attorney's fees and costs.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served this 23rd day of August 2023 via e-mail to all attorney designated emails on file with the Clerk of Court and FL e-Portal filing system pursuant to Rule 2.516.

PRIETO LAW GROUP, PLLC
Attorneys for Plaintiff
101 N.E. 3rd Ave., Ste. 1500
Fort Lauderdale, FL 33301
(954) 332-3648 – Office

By:  _____

Carlos A. Prieto

Fla. Bar No.: 114450

cprieto@prietolawgroup.com

For Service of Court Documents Only:

pleadings@prietolawgroup.com

Exhibit H

RETURN OF SERVICE

State of Florida

County of Dade

CIRCUIT Court

Case Number: 2023-020443-CA-01

Plaintiff:

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS INDENTURE TRUSTEE, FOR
NEW CENTURY HOME EQUITY LOAN TRUST 2005-1**



vs.

Defendant:

SHORN A. KING A/K/A SHORN KING A/K/A SHORN ANTHONY KING, ET AL

For:

Tromberg, Morris and Poulin, PLLC (FL)
1515 S FEDERAL HIGHWAY
SUITE 100
BOCA RATON, FL 33432

Received by Christopher Kady on the 6th day of September, 2023 at 9:00 am to be served on **NEW WORLD CONDOMINIUM APARTMENTS CONDOMINIUM ASSOCIATION INC, SECRETARY OF STATE, 2415 NORTH MONROE STREET, SUITE 810, TALLAHASSEE, FL 32303.**

I, Christopher Kady, do hereby affirm that on the **6th day of September, 2023 at 12:30 pm, I:**

served a **CORPORATE, PARTNERSHIP, ASSOCIATION OR GOVERNMENT SERVICE** Served the within named business entity by delivering a true copy of **SUMMONS, COMPLAINT and LIS PENDENS** to: **YVETTE SCOTT** as SUPERVISOR, an employee of the Registered Agent after confirming the Registered Agent was not in the office or was otherwise unavailable, pursuant to the requirements of Fla. Stat. 48.091, and informed said person of the contents therein, at **2415 N. MONROE ST. STE 810, TALLAHASSEE, FL 32303.** on behalf of **NEW WORLD CONDOMINIUM APARTMENTS CONDOMINIUM ASSOCIATION INC,** and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 50, Sex: F, Race/Skin Color: BLACK, Height: 5'8", Weight: 275, Hair: BLACK, Glasses: N

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served. "Under penalties of perjury, I declare that I have read the foregoing document and that the facts in it are true" F.S. 92.525. NOTARY NOT REQUIRED PURSUANT TO FS 92.525

Christopher Kady
Process Server 237

Our Job Serial Number: KDY-2023041890
Ref: 23-000398

X IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA.
 IN THE COUNTY COURT IN AND FOR MIAMI-DADE COUNTY, FLORIDA.



DIVISION X CIVIL OTHER DISTRICTS	SUMMONS 20 DAY CORPORATE SERVICE (a) GENERAL FORMS	CASE NUMBER 2023-020443-CA-01
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PLAINTIFF(S) DEUTSCHE BANK NATIONAL TRUST COMPANY, AS INDENTURE TRUSTEE, FOR NEW CENTURY HOME EQUITY LOAN TRUST 2005-1	VS. DEFENDANT(S) SHORN A. KING A/K/A SHORN KING A/K/A SHORN ANTHONY KING, ET AL.	SERVICE
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<p>THE STATE OF FLORIDA: To Each Sheriff of the State: YOU ARE COMMANDED to serve this Summons and a copy of the complaint or petition on defendant(s):</p> <p>NEW WORLD CONDOMINIUM APARTMENTS CONDOMINIUM ASSOCIATION, INC C/O PRESTIGE MANAGEMENT SOLUTIONS, INC. - REG. AGENT 6151 MIRAMAR PARKWAY SUITE 315 MIRAMAR, FL 33023</p> <p>Each defendant is required to serve written defense to the complaint or petition on Plaintiff's Attorney:</p> <p>Tromberg, Morris & Poulin, PLLC whose address is:</p> <p>1515 South Federal Highway, Suite 100, Boca Raton, FL 33432 Telephone #: 561-338-4101 Fax #: 561-338-4077 Email: eservice@tmppllc.com</p>	CLOCK IN
---	----------

within 20 days " **Except when suit is brought pursuant to s. 768.28, Florida Statutes, if the State of Florida, one of its agencies, or one of its officials or employees sued in his or her official capacity is a defendant, the time to respond shall be 40 days. When suit is brought pursuant to. 768.28, Florida Statutes, the time to respond shall be 30 days.**" after service of this summons on that defendant , exclusive of the day of service, and to file the original of the defenses with the Clerk of this Clerk Court either before service on Plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

Juan Fernandez-Barquin Clerk of the Court		DATE 8/2/2023
--	--	------------------

**AMERICANS WITH DISABILITIES ACT OF 1990
 ADA NOTICE**

"If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Eleventh Judicial Circuit Court's ADA Coordinator, Lawson E. Thomas Courthouse Center, 175 NW 1 Ave., Suite 2702, Miami, FL 33128, Telephone (305) 349-7175; TDD (305) 349-7174, Fax (305) 349-7355 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711."

Exhibit I

Exhibit C

DVC

DAMIAN | VALORI | CULMO

August 7, 2023

Via Email and First Class Mail

Mr. Elrod Phillips and Mr. Herby Myrthyl
2400 NW 98 Street
Miami, Florida 33147

Re: Demand for Removal of Mechanic's Lien filed in the official records of Miami-Dade County at Book 33784, pgs. 1200-1201.

Dear Messrs. Phillips and Myrthyl:

We represent the Honorable David M. Gersten (Ret.) as receiver of New World Condominium Apartments Condominium Association, Inc. (the "Association"), and write regarding the above-referenced mechanics lien which you and/or your companies, DJ's Consulting Group, LLC and/Elite Innovation Construction, Inc., filed on July 7, 2023. See Mechanic's Lien, attached as **Exhibit A**.

Florida law requires that a mechanic's lien be asserted within ninety (90) days of the date upon which work which was last performed. Here, work was last performed at the latest on January 28, 2023. See e.g., Mr. Myrthyl's own statements to the Miami-Dade County Fire Department that work was last performed for at the property on January 27, 2023. See Redacted Excerpt of the Miami-Dade Fire Department's Fire Inspection Report, attached as **Exhibit B**. As such, the ninety (90) day deadline to file a mechanic's lien against the Association expired on or about April 28, 2023 (i.e. months prior to the filing of the subject July 7, 2023 lien). For the foregoing reason, the lien is defective and is a "fraudulent lien" under Florida law.

The mechanic's lien is also defective because it is based upon a notice of commencement that is a forged instrument. See Notice of Commencement, attached as **Exhibit C**. Indeed, the verification pursuant to section 92.525, Florida Statutes does *not* reflect the signature of the property manager, Denise Brooks, but instead reflects her name written in Mr. Myrthyl's handwriting. The lien is, therefore, defective and is a "fraudulent lien" under Florida law, for this reason as well.

There are numerous other defects in the lien as to the property described and other matters as well. And, this letter is not a complete statement of the Association's rights.

For the foregoing reasons, DEMAND IS HEREBY MADE upon you to file a release of the mechanic's lien within 7 days. PLEASE GOVERN YOURSELVES ACCORDINGLY.

DVCATTORNEYS.COM

1000 BRICKELL AVENUE, SUITE 1020 | MIAMI, FL 33131

P: 305.371.3960 | F: 305.371.3965

DVC

DAMIAN | VALORI | CULMO

Sincerely,

Peter F. Valori

Peter F. Valori, Esq.
Morgan J. Levine, Esq.

DVCATTORNEYS.COM

1000 BRICKELL AVENUE, SUITE 1020 | MIAMI, FL 33131

P: 305.371.3960 | F: 305.371.3965



Recording requested by (name):)

DJS CONSULTING GROUP,LLC)
C/O)
DARLAY JOSEPH)

CFN 2023R0468873
OR BK 33784 Pgs 1200-1201 (2Pgs)
RECORDED 07/07/2023 14:09:25
JUAN FERNANDEZ-BARQUIN
CLERK OF THE COURT & COMPTROLLER
MIAMI-DADE COUNTY, FL

When recorded, mail to (name and address):)

ELROD PHILLIPS/HERBY MYRTHYL)
2400 NW 98 ST.)
MIAMI,FL33147)

SPACE ABOVE THIS LINE FOR RECORDER'S USE

MECHANIC'S LIEN

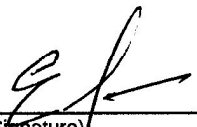
STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

1. ELITE INNOVATION CONSTRUCTION and its owner Elrod Phillips (the "Claimant"), located at 2400 NW 98th St, Miami, Florida 33147, claims a mechanics lien for the labor or services or equipment or materials described herein, furnished for a work of improvement on that certain real property located in the County of Miami-Dade, in the State of Florida. The complete address of the real property on which this mechanics lien is claimed is: 395 NW 177th St, Miami, Florida 33169 (the "Property"). The permanent index identification number of the Property is:34-2112-034-0010The legal description of the Property is:

UNDIV 0.99%
INT IN COMMON ELEMENTS
OFF REC 17301-1661
OR 17626-4130 0597 1
F/A/U 30-2112-034-0010

- 2. The labor or services or equipment or materials were furnished by Claimant at the request of:NEW WORLD CONDOMINIUM, located at 395 NW 177th St Apt 214, Miami, Florida 33169-4969.
- 3. The owner of the Property is: NEW WORLD CONDOMINIUM, located at 395 NW 177th St Apt 214, Miami, Florida 33169-4969.
- 4. On 11/15/2022, the Claimant entered into a written contract to re-roof flat on said Property (the "Contract") for the original total sum of \$550,000.00, which became due and payable on 01/13/2023, the date of completion of the build and/or project services.
- 5. After deducting all just credits and offsets, the sum of \$350,000.00 is due to Claimant for the labor or services or equipment or materials provided.

ELITE INNOVATION CONSTRUCTION
2400 NW 98th St
Miami Florida 33147



(Signature)
Elrod Phillips

EXHIBIT A

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

)
)
)

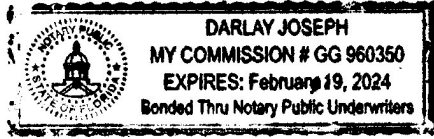
ss.

COUNTY OF MIAMI-DADE

The Affiant, Elrod Phillips owner of ELITE INNOVATION CONSTRUCTION being duly sworn, on oath deposes and says that s/he is the Claimant and that s/he has read the foregoing claim for the lien and knows the contents thereof, and that all statements therein contained are true and correct to the best of his/her belief and knowledge.

Subscribed and sworn to before me on

July 7, 2025



[Handwritten Signature]

(Notary Printed Name)

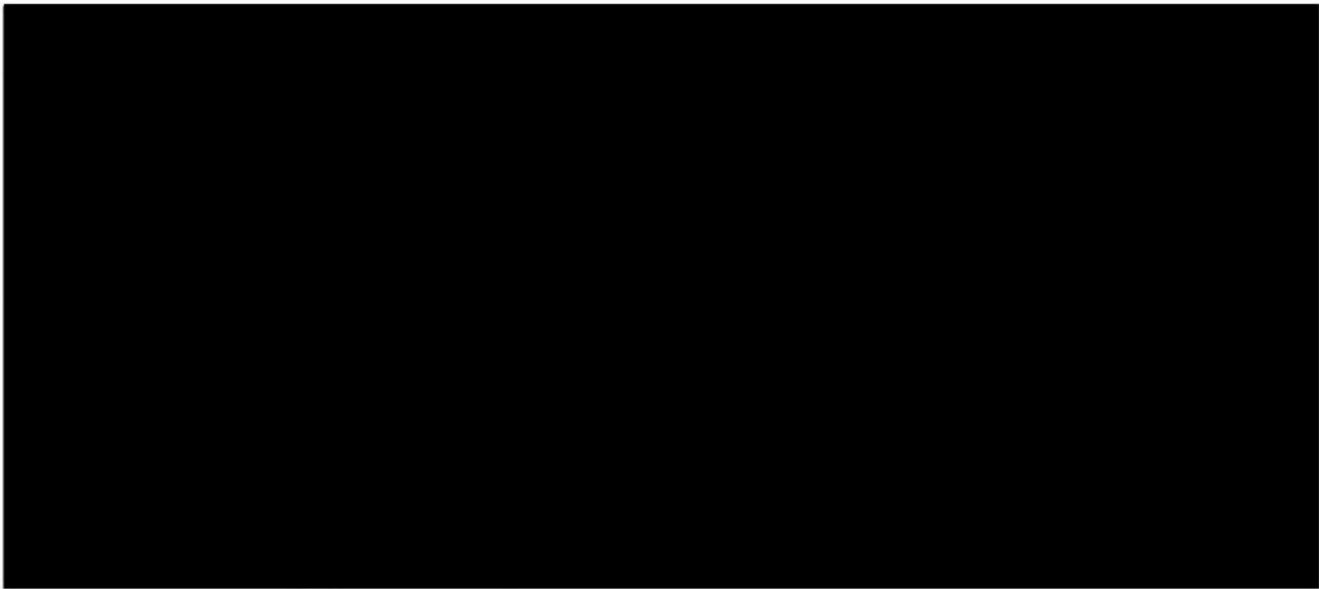
My commission expires on: _____



INCIDENT NARRATIVE

31 WITNESS INTERVIEWS AND VIDEO FOOTAGE:

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44 Herby Myrttil (Owner of DJTH Roofing)
45 DOB: 01FEB72
46 DL: M634320720410
47 12030 NW 21 Ct, N Miami, FL 33167
48 Cell: 786-277-2525
49

CERTIFIED TRUE COPY
OF THE ORIGINAL DOCUMENT ON FILE WITH
MIAMI-DADE COUNTY
FIRE RESCUE DEPARTMENT
9300 N.W. 27th Street
DORAL, FLORIDA 33126

[Signature] 01/28/23

- 50 • He had been doing roof work on 395 NW 177 St for more than a month.
- 51 • He had come to the scene to pick up supplies for a job in Ft. Lauderdale.
- 52 • He was not doing roof work at the property today.
- 53 • They last worked on the roof yesterday, 27JAN23.
- 54 • They worked on the west side of the building.
- 55 • They were not using hot tar or using torches.
- 56 • They were installing pans around air conditioner openings.
- 57 • They had not worked in the vicinity of the fire origin approximately two weeks ago.
- 58 • He dropped his brother off in the east parking lot to gather the needed supplies, and he continued on to get
- 59 gas at a nearby gas station.
- 60 • He and his brother were talking on the phone, and his brother told him that there was smoke coming from
- 61 the eaves near the northeast corner of the building.
- 62 • He turned around and drove into the east parking lot.
- 63 • He saw smoke coming from the eaves above apartment 217.
- 64 • There was also smoke coming from the open entry door of apartment 217.
- 65 • He took a fire extinguisher from a cabinet on the first floor and took it up the stairs to apartment 217.
- 66 • The fire was venting through the top north corner of the window located on the south side of the open entry
- 67 door of apartment 217.
- 68 • There was heavy smoke coming from the open entry door of apartment 217.
- 69 • He discharged the fire extinguisher through the door into apartment 217.
- 70 • The fire extinguisher didn't make any difference.



INCIDENT NARRATIVE

71 • He called the Property Manager and left the scene.

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CERTIFIED TRUE COPY
OF THE ORIGINAL DOCUMENT ON FILE WITH
MIAMI-DADE COUNTY
FIRE RESCUE DEPARTMENT
9300 N.W. 41 STREET
DORAL, FLORIDA 33178-2414
DATE 01/28/23



NOTICE OF COMMENCEMENT

A RECORDED COPY MUST BE POSTED ON THE JOB SITE AT TIME OF FIRST INSPECTION



CFN 2022R0836322
DR BK 33449 Pg 1314 1 Pgs
RECORDED 11/02/2022 11:11:31
HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA

PERMIT NO. 2022-001489 TAX FOLIO NO. _____


STATE OF FLORIDA:
COUNTY OF MIAMI-DADE:

THE UNDERSIGNED hereby gives notice that improvements will be made to certain real property, and in accordance with Chapter 713, Florida Statutes, the following information is provided in this Notice of Commencement.

Space above reserved for use of recording

- 1. Legal description of property and street/address: 395 NW 177 St Miami Gardens Florida 33169
- 2. Description of improvement: RR ROOFING Shingles and Flat.
- 3. Owner(s) name and address: NEW WOOD CONDOMINIUM 395 NW 177 St Miami
Interest in property: _____
Name and address of fee simple titleholder: _____
- 4. Contractor's name, address and phone number: ELITE INOVATION Construction
2400 NW 98 St, MIA FL 33147 Tel=305 527 8303
- 5. Surety: (Payment bond required by owner from contractor, if any)
Name, address and phone number: _____
Amount of bond \$ _____
- 6. Lender's name and address: _____
- 7. Persons within the State of Florida designated by Owner upon whom notices or other documents may be served as provided by Section 713.13(1)(a)7., Florida Statutes,
Name, address and phone number: _____
- 8. In addition to himself, Owners designates the following person(s) to receive a copy of the Owner's Notice as provided in Section 713.13(1)(b), Florida Statutes.
Name, address and phone number: _____
- 9. Expiration date of this Notice of Commencement: _____
(the expiration date is 1 year from the date of recording unless a different date is specified)

STATE OF FLORIDA, COUNTY OF MIAMI-DADE
I HEREBY CERTIFY that this is a true copy of the original filed in this office on NOV 02 2022 day of NOV, AD 2022
By [Signature] HARVEY RUVIN, Clerk of Circuit and County Courts
D.C.

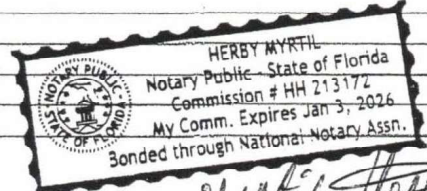


WARNING TO OWNER: ANY PAYMENTS MADE BY THE OWNER AFTER THE EXPIRATION OF THE NOTICE OF COMMENCEMENT ARE CONSIDERED IMPROPER PAYMENTS UNDER CHAPTER 713, PART I, SECTION 713.13, FLORIDA STATUTES, AND CAN RESULT IN YOUR PAYING TWICE FOR IMPROVEMENTS TO YOUR PROPERTY. A NOTICE OF COMMENCEMENT MUST BE RECORDED AND POSTED ON THE JOB SITE BEFORE THE FIRST INSPECTION. IF YOU INTEND TO OBTAIN FINANCING, CONSULT WITH YOUR LENDER OR AN ATTORNEY BEFORE COMMENCING WORK OR RECORDING YOUR NOTICE OF COMMENCEMENT.

Signature(s) of Owner(s) or Owner(s)' Authorized Officer/Director/Partner/Manager
Prepared By DENISE BROOKS Prepared By DENISE BROOKS
Print Name DENISE BROOKS Print Name DENISE BROOKS
Title/Office _____ Title/Office _____

STATE OF FLORIDA
COUNTY OF MIAMI-DADE
The foregoing instrument was acknowledged before me this 02 day of NOVEMBER, 2022
By DENISE BROOKS

Individually, or as _____ for _____
 Personally known, or produced the following type of identification:
Signature of Notary Public: _____
Print Name: _____
(SEAL)



[Signature]
HERBY MYRTILL

VERIFICATION PURSUANT TO SECTION 92.525, FLORIDA STATUTES
Under penalties of perjury, I declare that I have read the foregoing and that the facts stated in it are true, to the best of my knowledge and belief.

Signature(s) of Owner(s) or Owner(s)'s Authorized Officer/Director/Partner/Manager who signed above:
By DENISE BROOKS By _____

Composite Exhibit 1

GORDON&REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER®
1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

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

August 18, 2023
ID: GERSP 1299620
Invoice No. 21387879
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH July 31, 2023

Fees For Professional Services:	\$22,525.00
LESS DISCOUNT	-\$2,252.50
Total for Professional Services:	\$20,272.50
Expenses and Advances:	<u>\$42.47</u>
Current Bill:	\$20,314.97

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
07/03/23	Review Motion in Whitfield case .1; review and respond to Peter Valori email with BOD information .1	DMG2	0.20
07/06/23	Review and respond to Melanie Damian email re: Whitfield case .1	DMG2	0.10
07/07/23	Strategic conference with Melanie Damian and Peter Valori re: lawsuits and demolition .7	DMG2	0.70
07/10/23	Review amended complaint filed in Whitfield case .3; review response to motion to dismiss in Whitfield case .1; conference c with Rick Zelman re: title review issue .1; review emails between Rick Zelman and Peter Valori re: roofer .1	DMG2	0.60
07/11/23	Review and respond to Peter Valori email re: laundry equipment .1; review and respond to Peter Valori email with draft complaint and other court filings .3; review email sent by Peter Valori to Winfield case lawyer re: where case belongs and priority of interest .1	DMG2	0.50
07/12/23	Review order on transfer of case .1; conference with Melanie Damian re: possible lawsuits and judge assigned .1; review and respond to Peter Valori email re: court order .1; attend zoom meeting with owners 1.3; review lien information re: liens on property .2	DMG2	1.80
07/13/23	Review and respond to Peter Valori email with complaint attached .3	DMG2	0.30
07/14/23	Conference with Peter Valori and Eric Thompson re: pending lawsuits 1.1; review and respond to Peter Valori email re: new Demo Gods proposal for demolition .2; review email exchanges between Nicole Baffi (insurance) and Peter Valori re: case progress .1; review and respond to Peter Valori and rick Zelman email re: consent re: title insurance .1; review and respond to Rick Zelman and Peter Valori email re: homestead issue .1; review and respond to Peter Valori email re: new demolition proposal .2	DMG2	1.80
07/14/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Peter Valori, Esq.) to discuss strategy going forward, including with regard to pending lawsuits filed against the Association by homeowners and renters	ERT	1.10
07/17/23	Review and respond to Morgan Levine email with draft motion to transfer for review .2; review and respond to Iris Castillo emails with billing attached for review .3; review and respond to Eric Thompson	DMG2	0.60

	and Peter Valori email re: complaint and research in advance of conference .1		
07/17/23	Telephone conference with L. Lagosino to discuss strategy with regard to legal research assignment to be completed by L. Lagosino as to potential defenses to tenant class action lawsuit recently filed against the Association	ERT	0.70
07/18/23	Communication with Rick Zelman re: contact homeowners directly .1; review and respond to Peter Valori email with demolition estimate attached .1	DMG2	0.20
07/18/23	Draft memorandum to Judge Gersten re whether receiver will be required to assess unit owners if judgment is entered against the Association in tenant's class action including analysis of standing by tenants to bring suit, potential impact of stay order, and open questions re termination of condominium under Florida statute and condo declaration.	LML3	2.80
07/18/23	Continue analysis and research of various issues, including whether tenant has standing to sue condominium association; tenant's standing to bring class action for casualty loss; statutory provision regarding termination of condominium and comparing same to existing condo declaration; whether existing statute supersedes existing condo declaration; whether proper request for appointment of magistrate to sell condominium should occur through termination of condominium provisions or under partition statute and review impact of same on partition action.	LML3	5.60
07/18/23	Discuss results of research with Mr. Thompson in light of upcoming meeting with Tenant's lawyers	LML3	0.60
07/18/23	Meet with Mr. Thompson re issues to be researched	LML3	0.70
07/18/23	Attend meeting with L. Lagosino to discuss preliminary results of her research as to potential defenses to tenant class action lawsuit recently filed against the Association, including strategy with regard thereto	ERT	0.60
07/19/23	Review and respond to Peter Valori email re: demolition information .1; conference with Eric Thompson re: Leo Lagamasino memo of law .4; review cases cited in memo .6	DMG2	1.10
07/19/23	Finalize and distribute memorandum to Judge Gersten re remedies available to Tenants in class action; receive additional comments and questions from Mr. Valori in response to memo, including whether Receiver can be forced to assess, Unit Owners' individual liability, and impact of termination; review prior research and conduct additional	LML3	9.40

	research re same; prepare and distribute updated memorandum re same		
07/19/23	Telephone conference with D. Gersten to discuss strategy going forward in light of memorandum drafted by L. Lagosino regarding potential defenses and other issues pertaining to tenant class action lawsuit recently filed against the Association	ERT	0.40
07/19/23	Email correspondence with independent counsel (Peter Valori, Esq.) attaching and regarding memorandum drafted by L. Lagosino addressing potential defenses and other issues pertaining to tenant class action lawsuit recently filed against the Association	ERT	0.10
07/19/23	Analyze memorandum drafted by L. Lagosino regarding potential defenses and other issues pertaining to tenant class action lawsuit recently filed against the Association, 6 pages	ERT	0.30
07/20/23	Review and respond to Eric Thompson email re: memo of law .2; conference with Eric Thompson re: class action case/Duane conference .4	DMG2	0.60
07/20/23	Attend (at the office of independent counsel, Peter Valori, Esq.) meeting with Mr. Valori, Melanie Damian, Esq., and counsel for the tenant class action lawsuit recently filed against the Association (Dwayne Robinson, Esq.) to discuss steps going forward with regard to that lawsuit, participation action filed by the Association, and pending homeowner class action lawsuit (including potential resolution of same) (includes travel time) (Ms. Damian attended a portion of that meeting)	ERT	2.20
07/20/23	Telephone conference with D. Gersten regarding outcome of today's meeting with counsel for the tenant class action lawsuit recently filed against the Association (Dwayne Robinson, Esq.) to discuss steps going forward with regard to that lawsuit, participation action filed by the Association, and pending homeowner class action lawsuit (including potential resolution of same)	ERT	0.40
07/20/23	Analyze supplemental memorandum drafted by L. Lagosino regarding potential defenses and other issues pertaining to tenant class action lawsuit recently filed against the Association, 5 pages	ERT	0.40
07/23/23	Conduct additional research as to whether trustee in Ch. 7 would be required to specially assess for judgment; research bankruptcy cases involving condominium associations; research cases involving homeowner's associations; research dismissal of Ch. 7 bankruptcy actions; research case law when statute intended to apply retroactively; research whether termination provision in condo act can be applied retroactively; review condo documents regarding whether language included to allow retroactive application of statute; research 1996	LML3	5.80

	termination of condo provision.		
07/24/23	Review and respond to Morgan Levine email(s) re: unit owners .1	DMG2	0.10
07/25/23	Continue research re whether a receiver or trustee would be required to specially assess if a judgment is entered against the association and in particular under statutory termination provision in effect in 1996; track down history of Westwood opinions, including unpublished decisions	LML3	2.70
07/26/23	Review and respond to Melanie Damian email re: receiver's certificate and documents attached .3; review and respond to multiple emails from Melanie Damian re: certificate .1	DMG2	0.40
07/27/23	Review motion to dismiss in Whitfield case .2	DMG2	0.20
07/28/23	Review answer and affirmative defenses .2; communication from Rick Zelman re: legal issue .1	DMG2	0.30
07/29/23	Continue research and analysis of whether a Chapter 7 trustee has obligation to specially assess after a judgment against the association; continue research and analysis of ramifications of termination of condominium on right and duty to specially assess; continue research and analysis of any case where condominium association filed bankruptcy; begin draft of memo re same	LML3	6.80
07/31/23	Review and respond to Megan Levine email re: owners contact list .1	DMG2	0.10
07/31/23	Continue draft of memo re whether special assessment is mandated if judgment entered against association	LML3	2.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	675.00	9.60	6,480.00
ERT	Eric Thompson	Partner	360.00	6.20	2,232.00
LML3	Leonor Lagomasino	Of Counsel	315.00	36.70	11,560.50

TOTAL FOR SERVICES	\$22,525.00
LESS DISCOUNT	-2,252.50
TOTAL FEES	\$20,272.50

Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/12/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-199-39037 DATE: 7/21/2023 FedEx service for 819939037,781054392610,Delivery service fees of 42.47 to David Gersten, 14804 SE NORTHSHORE CIR/VANCOUVER WA 98683 re: 13769/matter id 1299620	42.47
	TOTAL EXPENSES	<hr/> \$42.47

Outstanding Statements as of August 18, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Total Accounts Receivable Balance:		<hr/> \$23,995.00 <hr/>

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

August 18, 2023
ID: GERSP 1299620
Invoice No. 21387879
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH July 31, 2023

Fees For Professional Services:	\$22,525.00
LESS DISCOUNT	-2,252.50
Total for Professional Services:	20,272.50
Expenses and Advances:	<u>42.47</u>
Current Bill:	\$20,314.97

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: 21387879

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

September 28, 2023
ID: GERSP 1299620
Invoice No. 21415053
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH August 31, 2023

Fees For Professional Services:	\$7,455.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$7,455.00

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
08/01/23	Review and respond to Mehgan Levine email re: posting .1	DMG2	0.10
08/02/23	Review and respond to email from receivership re: letter re: Rick Zelman .1	DMG2	0.10
08/03/23	Review Reesa Setae re: motion to transfer .1	DMG2	0.10
08/04/23	Review and respond to email from Reese Setae re: next zoom meeting .1; review and respond to Reese Setae email re: next meeting .1; review answer and affirmative defenses in Higgs case .2	DMG2	0.40
08/06/23	Review and respond to Morgan Levine email with draft letter attached re: lien .2	DMG2	0.20
08/07/23	Review Morgan Levine email with proposed motion and approve motion for extension of time .1; review order signed by court re: extension of time .1; review Whitfield response to motion to dismiss .2; review Rick Zelman email re: Morel settlement .1	DMG2	0.50
08/08/23	Review and respond to Peter Valori email re: Lagerre .1; review and respond to email from Peter Valori re: other plaintiff's .1	DMG2	0.20
08/09/23	Review and respond to Peter Valori email re: conference .1; review Peter Valori email re: Laguerre .1	DMG2	0.10
08/10/23	Review emails between Ozzie Diaz and Peter Valori re: pictures .1; conference with Melanie dalian, Peter Valori and Eric Thompson re: lawsuit issues .3; review email exchange re: Hammett issue .1	DMG2	0.50
08/10/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq. and Peter Valori, Esq.) regarding steps going forward as to pending lawsuits against the Association and insurance	ERT	0.70
08/11/23	Review answer filed by homeowner Lous .1; review Nationstar answer .1; review and respond to Peter Valori email with R. Zellman bills for review .1	DMG2	0.30
08/14/23	Review draft receiver's report for the court .3	DMG2	0.30
08/15/23	Review and respond to Peter Valori email re: report and application .1	DMG2	0.10
08/18/23	Review and respond to email from Morgan Levine with order attached	DMG2	0.20

	.1; review and respond to Peter Valori email re: demolition .1		
08/21/23	Review and respond to Peter Valori email re: demolition .1; review and respond to Peter Valori email with insurance certificate attached .1; review and respond to Peter Valori email re: funding for demolition .1	DMG2	0.30
08/21/23	Continue research and analysis of Florida termination provision and determination as to whether receiver must specially assess in order to satisfy judgment	LML3	2.40
08/21/23	Attend meeting with L. Lagosino to discuss strategy with regard to continued legal research assignment to be completed by L. Lagosino as to potential defenses to tenant and homeowner class action lawsuits filed against the Association	ERT	1.10
08/21/23	Telephone conference with independent counsel (Peter Valori, Esq.) to discuss: 1) demolition bids; and 2) potential defenses to tenant and homeowner class action lawsuits filed against the Association	ERT	1.10
08/22/23	Review and respond to Peter Valori email re: lawsuit progress .1	DMG2	0.10
08/22/23	Attend (remotely, via Zoom) meeting with independent counsel (Peter Valori, Esq.) and homeowners to discuss issues going forward	ERT	1.60
08/24/23	Review and respond to Peter Valori email re: insurance coverage .1; review answer and affirmative response .2	DMG2	0.30
08/29/23	Review Whitfield case .1	DMG2	0.10
08/29/23	Email correspondence with D. Gersten and independent counsel (Peter Valori, Esq. and Melanie Damian, Esq.) regarding strategy as to claim against property management company (Prestige)	ERT	0.10
08/30/23	Review and respond to Peter Valori email re: proposed order in Whitfield case .1; review and respond to Peter Valori email re: Prestige case .1; review and respond to Peter Valori email with revised demolition contract for review and approval .3	DMG2	0.50
08/31/23	Review Peter Valori emails with Rick Zelman re: satisfaction of judgments .1; review and respond to Peter Valori email re: demolition contract .1; review and respond to Morgan Levine email with attached memorandum of law .3	DMG2	0.50
08/31/23	Continue analysis of Order Appointing Receiver with regard to court approval to file tenants suit and to seek recovery of judgment and receiver's obligation to creditors; continue review of Ch 7 actions filed by condo associations; research orders entered in Champlain Towers	LML3	2.80

matter; conference with Mr. Thompson re same

08/31/23 Meeting with L. Lagomasino to discuss her continued research as to potential assessment issues implicated by pending lawsuits ERT 0.30

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	4.90	3,675.00
ERT	Eric Thompson	Partner	400.00	4.90	1,960.00
LML3	Leonor Lagomasino	Partner	350.00	5.20	1,820.00

TOTAL FOR SERVICES **\$7,455.00**

Outstanding Statements as of September 28, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Total Accounts Receivable Balance:		\$44,309.97

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Tax ID: 94-1617026

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

September 28, 2023
ID: GERSP 1299620
Invoice No. 21415053
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH August 31, 2023

Fees For Professional Services:	\$7,455.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$7,455.00

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: 21415053

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Tax ID: 94-1617026

David Gersten
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100 SE Second St, Suite 3900
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October 12, 2023
ID: GERSP 1299620
Invoice No. 21424056
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH September 30, 2023

Fees For Professional Services:	\$4,275.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,275.00

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
09/03/23	Review answer and defenses in case .2	DMG2	0.20
09/03/23	Continue research of cases where trustee appointed for homeowners or condo association	LML3	2.80
09/04/23	Review Morgan Levine memo of law .2	DMG2	0.20
09/06/23	Review and respond to Peter Valori email re: skip trace authorization .1	DMG2	0.10
09/07/23	Review and respond to Peter Valori email re: demand .1	DMG2	0.10
09/09/23	Review and respond to Morgan Levine email with notice of demolition for review .1	DMG2	0.10
09/11/23	Review answers and affirmative defenses from Chase .2	DMG2	0.20
09/12/23	Review and respond to Reese Setae email re: next zoom .1	DMG2	0.10
09/13/23	Review and respond to Reesea Setae email re: zoom .1; review and respond to Morgan Levine re: filing .1; review filed notice of demolition .1	DMG2	0.30
09/14/23	Review and respond to Reesea Setae re: zoom with owners .1	DMG2	0.10
09/16/23	Review and respond to Peter Valori email re: letter to Mr. Barkett .1; review and respond to Peter Valori and Melanie Damian email re: letter .1	DMG2	0.20
09/18/23	Review and respond to Rick Zelman email re: payments .1	DMG2	0.10
09/19/23	Review and respond to Rick Zelman re: statute .1; review and respond to Melanie Damian email re: payment .1; review and respond to Melanie Damian email re: judicial order .1	DMG2	0.30
09/20/23	Review and approve letter re: insurance .1; review and approve letter to Barkett .1; review and respond to Melanie Damian email re: letter re: Kozyak law firm .1; review and respond to Peter Valori email re: insurance letter .1; review and respond to Peter Valori email re: opinion letter .1	DMG2	0.50
09/21/23	Analyze 7/5/23 and 8/21/23 correspondence from Hiscox to Prestige Management Solutions, Inc. regarding Hiscox's coverage position, 7	ERT	0.40

total pages, in furtherance of analyzing issues pertaining to sub-limit for property damages under the subject Professional Liability insurance policy

09/21/23	Begin to analyze Florida federal and state case law and non-Florida federal case law addressing the propriety of sub-limits or exclusions for property damage in E&O policies (in furtherance of analyzing issues pertaining to sub-limit for property damages under the Professional Liability insurance policy issued to Prestige Management Solutions, Inc.)	ERT	0.40
09/22/23	Review emails between Peter Valori and Eric Thompson re: pending issues .1	DMG2	0.10
09/22/23	Finish analyzing Florida federal and state case law and non-Florida federal case law addressing the propriety of sub-limits or exclusions for property damage in E&O policies (in furtherance of analyzing issues pertaining to sub-limit for property damages under the Professional Liability insurance policy issued to Prestige Management Solutions, Inc.)	ERT	0.70
09/22/23	Email correspondence with independent counsel (Peter Valori, Esq.) regarding my analysis of issues pertaining to sub-limit for property damages under the Professional Liability insurance policy issued to Prestige Management Solutions, Inc.	ERT	0.20
09/26/23	Review and respond to Peter Valori email with proposed retainer agreement for review .2	DMG2	0.20
09/28/23	Review Rick Zelman email re: Higgs .1; review Rick Zelman email re: Morel .1; review and respond to Peter Valori email re: asbestos and trees .2	DMG2	0.40
09/29/23	Review Peter Valori letter re: Prestige .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	3.30	2,475.00
ERT	Eric Thompson	Partner	400.00	1.70	680.00
LML3	Leonor Lagomasino	Partner	400.00	2.80	1,120.00

TOTAL FOR SERVICES

\$4,275.00

Outstanding Statements as of October 12, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Total Accounts Receivable Balance:		<u><u>\$51,764.97</u></u>

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GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

1111 Broadway, Suite 1700

Oakland, California 94607

(510) 463-8600

Tax ID: 94-1617026

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

October 12, 2023
ID: GERSP 1299620
Invoice No. 21424056
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH September 30, 2023

Fees For Professional Services:	\$4,275.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$4,275.00

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: 21424056

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GORDON REES SCULLY MANSUKHANI

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Oakland, California 94607

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Tax ID: 94-1617026

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

November 13, 2023
ID: GERSP 1299620
Invoice No. 21445391
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH October 31, 2023

Fees For Professional Services:	\$2,720.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,720.00

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

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
10/04/23	Review and respond to Morgan Levine email with permits, etc. for review .2	DMG2	0.20
10/06/23	Review and respond to Peter Valori email and subpoena attached .1; review and respond to Eric Thompson email re: plan re: subpoena .1	DMG2	0.20
10/10/23	Review and respond to Morgan Levine email re: subpoenas .1	DMG2	0.10
10/12/23	Review answer filed in case .1	DMG2	0.10
10/15/23	Review Peter Valori email with notice of hearing for review .1	DMG2	0.10
10/16/23	Review and respond to Reesa Setae re: hearing .1; review email from Rick Zelman and review billing .2	DMG2	0.30
10/17/23	Review and respond to Peter Valori email with attached reports for review .3	DMG2	0.30
10/18/23	Review and respond to Morgan Levine email with attached video .1; review Peter Valori email re: coverage question .1	DMG2	0.20
10/19/23	Review survey sent by Peter Valori .2	DMG2	0.20
10/20/23	Review for approval responses sent by Morgan Levine .3	DMG2	0.30
10/20/23	Analyze draft Response to Subpoena Without Deposition (drafted by independent counsel, Morgan Levine, Esq.), 3 pages	ERT	0.10
10/23/23	Attend zoom conference with homeowners re: update .5; reweiw and respond to Nicole Banfi email re: coverage .1; review and respond to Megan Levine email re: amended complaint for review .3	DMG2	0.90
10/23/23	Attend (remotely, via Zoom) meeting with independent counsel (Peter Valori, Esq.), D. Gersten and homeowners to discuss pending action items and strategy going forward	ERT	0.70
10/27/23	Review and respond to Peter Valori email re: service by publication .1	DMG2	0.10
10/29/23	Review and respond to Peter Valori email re: strategy .1	DMG2	0.10
10/31/23	Review and respond to Peter Valori email re: insurance .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	3.20	2,400.00
ERT	Eric Thompson	Partner	400.00	0.80	320.00

TOTAL FOR SERVICES **\$2,720.00**

Outstanding Statements as of November 13, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
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
Total Accounts Receivable Balance:		\$56,039.97

GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

1111 Broadway, Suite 1700

Oakland, California 94607

(510) 463-8600

Tax ID: 94-1617026

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

November 13, 2023
ID: GERSP 1299620
Invoice No. 21445391
Gersten, David M.

RE: Baptiste v. New World Condominium

BILLING SUMMARY THROUGH October 31, 2023

Fees For Professional Services:	\$2,720.00
Expenses and Advances:	<u>0.00</u>
Current Bill:	\$2,720.00

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: 21445391

REMITTANCE COPY
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

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

Invoice

Invoice Date: 10/31/2023
 Invoice No: 23512
 Due Date: Due Upon Receipt

Matter: MME1676

Memo: MME1676 Louis Jean Baptiste et al. v. New World Condo Apartments
 Condominium Assn Inc. - Receivership, Louis Jean Baptiste et al. v. New
 World Condo Apartments Condominium Assn Inc. - Receivership

Professional Fees

Date	Description	Staff	Rate	Hours	Amount
07/01/2023	Review email regarding status report on service of process as to waivers of service in partition service.	PFV	\$550.00	0.30	\$165.00
07/03/2023	Email communications with the Receiver regarding Accurant reports for board members regarding potential claims.	MJL	\$350.00	0.30	\$105.00
07/03/2023	Email regarding litigation planning as to Whitfield case as to insurance company notice.	PFV	\$550.00	0.10	\$55.00
07/03/2023	Email with opposing counsel regarding requested extension of time to respond to motion to dismiss/stay.	PFV	\$550.00	0.10	\$55.00
07/03/2023	Email regarding request for extension of time by Plaintiff.	PFV	\$550.00	0.10	\$55.00
07/03/2023	Review motion regarding same.	PFV	\$550.00	0.10	\$55.00
07/04/2023	(No charge) Emails to and Receiver's office and P. Valori regarding Accurant reports and telephone conference.	rs		0.20	\$0.00
07/05/2023	Emails and calls regarding demolition financing.	MME	\$550.00	0.40	\$220.00
07/05/2023	Work on file regarding additional loan for demolition of building.	PFV	\$550.00	0.40	\$220.00
07/05/2023	Conference with unit owner explaining reason for waiver.	rs	\$100.00	0.20	\$20.00
07/06/2023	Emails and calls regarding funding issues (.4); reviewing class counsel requests and email regarding same (.4).	MME	\$550.00	0.80	\$440.00
07/06/2023	Email with Demolition Gods regarding survey and quote.	PFV	\$550.00	0.20	\$110.00
07/06/2023	Conference with M. Damian regarding status and planning as to financing and demolition.	PFV	\$550.00	0.20	\$110.00
07/06/2023	Conference with D. Jellema regarding status of demolition quotes.	PFV	\$550.00	0.20	\$110.00
07/06/2023	Email regarding laundry equipment removal.	PFV	\$550.00	0.10	\$55.00
07/07/2023	Meeting with Receiver regarding various pending issues (.7); e-mails regarding funding demolition (.4).	MME	\$550.00	1.10	\$605.00

07/07/2023	Call with J. Gersten regarding status and planning as to demolition and third party lawsuits.	PFV	\$550.00	0.70	\$385.00
07/08/2023	Managing resident access and recovery of possessions.	dj	\$120.00	5.00	\$600.00
07/10/2023	Meet with laundry service company and assist in pick up laundry equipment removal; work with Waste Connection with garbage removal.	dj	\$120.00	5.00	\$600.00
07/10/2023	Reviewing amended complaint against Presitige by class (.2); reviewing draft complaint by Receiver against Prestige (.8); telephone calls regarding same (.2).	MME	\$550.00	1.20	\$660.00
07/10/2023	Analyze amended complaint in preparation of hearing on motion to transfer in Whitfield case (0.3); analyze plaintiff's response to motion to dismiss or transfer in preparation of same (0.3).	MJL	\$350.00	0.60	\$210.00
07/10/2023	Conference with project manager regarding releases to be signed by laundry services company.	PFV	\$550.00	0.10	\$55.00
07/10/2023	Email regarding notice of commencement and title related issues.	PFV	\$550.00	0.30	\$165.00
07/10/2023	Call with R. Zellman regarding title issues.	PFV	\$550.00	0.20	\$110.00
07/10/2023	Email with counsel for putative Plaintiff's counsel regarding request to meet and conference.	PFV	\$550.00	0.20	\$110.00
07/11/2023	Review and analyze response to motion to transfer and prepare for hearing on motion to transfer.	RML	\$550.00	0.30	\$165.00
07/11/2023	Meet with several demolition companies to receive quotes; work on survey and measurements of property.	dj	\$120.00	7.00	\$840.00
07/11/2023	Work on complaint to be filed against property management company with focus on revisions to same.	MJL	\$350.00	0.40	\$140.00
07/11/2023	Analyze plaintiff's notice of dropping party in preparation of hearing on motion to transfer in Whitefield case.	MJL	\$350.00	0.10	\$35.00
07/11/2023	Review and revise complaint against Prestige.	PFV	\$550.00	0.80	\$440.00
07/11/2023	Review email regarding removal of laundry equipment.	PFV	\$550.00	0.10	\$55.00
07/11/2023	Draft status email to Receiver.	PFV	\$550.00	0.10	\$55.00
07/11/2023	Additional work on Prestige complaint.	PFV	\$550.00	0.40	\$220.00
07/11/2023	Draft email to Receiver regarding status and planning.	PFV	\$550.00	0.30	\$165.00
07/11/2023	Draft email regarding related case notice for civil cover sheet.	PFV	\$550.00	0.10	\$55.00
07/11/2023	Email regarding land and asbestos surveys regarding demolition quotes and review old land survey regarding same.	PFV	\$550.00	0.30	\$165.00
07/11/2023	Email regarding surveyor quote from All County.	PFV	\$550.00	0.20	\$110.00
07/11/2023	Email with Mr. Freidman regarding claim for attorneys fees.	PFV	\$550.00	0.20	\$110.00
07/11/2023	Draft email to counsel for the Plaintiff in the Whitfield case.	PFV	\$550.00	0.20	\$110.00
07/12/2023	Reviewing amended complaint against Presitige by class (.2); reviewing draft complaint by Receiver against Prestige (.8); telephone calls regarding same (.2).	MME	\$550.00	1.20	\$660.00

07/12/2023	Analyze documents provided by D. Brooks to determine whether invoice from B. Friedman was paid by the association.	MJL	\$350.00	0.30	\$105.00
07/12/2023	(No charge) Appear at hearing on motion to transfer in Whitfield case.	MJL		0.40	\$0.00
07/12/2023	Prepare for hearing on motion to transfer in Whitfield case.	PFV	\$550.00	0.40	\$220.00
07/12/2023	Attend hearing on motion to transfer in Whitfield case.	PFV	\$550.00	0.50	\$275.00
07/12/2023	Prepare status report regarding hearing on motion to transfer and as to litigation planning regarding multiple cases against Prestige Management.	PFV	\$550.00	0.40	\$220.00
07/12/2023	Additional email with Receiver regarding same.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Conference with project manager regarding demolition quotes.	PFV	\$550.00	0.20	\$110.00
07/12/2023	Email with R. Zelman regarding County liens.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Call to Building Official regarding plans for demolition.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Email with Rick Zelman regarding request for additional information concerning folio number tagged liens by the County.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Email regarding service of process of Gersten v. Prestige case.	PFV	\$550.00	0.20	\$110.00
07/12/2023	Review email regarding waiver of service from M. Archie and draft response.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Prepare for (.2); and attend (1.1); Zoom conference with ownership group.	PFV	\$550.00	1.30	\$715.00
07/12/2023	Draft email regarding next periodic report.	PFV	\$550.00	0.10	\$55.00
07/12/2023	Review County liens and draft email regarding same.	PFV	\$550.00	0.30	\$165.00
07/12/2023	Email with M. Damian regarding possible claims process.	PFV	\$550.00	0.20	\$110.00
07/12/2023	Email with D. Robinson regarding insurance matters and new case filed by his law firm.	PFV	\$550.00	0.20	\$110.00
07/12/2023	Review sunbiz site for information on Prestige (.2); draft summons of service of complaint to Prestige (.2); email to and from P. Valori regarding same (.1).	rs	\$100.00	0.50	\$50.00
07/12/2023	(No charge) Review and analyze order setting initial case management conference and case management report regarding Whitfield Case.	rs		0.30	\$0.00
07/13/2023	Meet with junk removal and work on bulk pick up; clean up excess debris in common areas of the property.	dj	\$120.00	4.00	\$480.00
07/13/2023	Email regarding response to request for summary of Zoom meeting.	PFV	\$550.00	0.20	\$110.00
07/13/2023	Email with counsel for Thomas class action Plaintiff regarding status conference.	PFV	\$550.00	0.10	\$55.00
07/13/2023	Review potential creditor summary regarding possible claims procedure.	PFV	\$550.00	0.10	\$55.00
07/13/2023	Draft email regarding potential claims procedure.	PFV	\$550.00	0.10	\$55.00
07/13/2023	Email from real estate counsel regarding request for information regarding loans.	PFV	\$550.00	0.10	\$55.00

07/13/2023	Draft email regarding response to request for information regarding unit owner loans.	PFV	\$550.00	0.10	\$55.00
07/13/2023	Review and analyze Thomas v. Prestige complaint and attachments (.5); and email with Receiver regarding same (.3).	PFV	\$550.00	0.80	\$440.00
07/13/2023	(No charge) Review order setting case management deadlines (.2); email to P. Valori regarding status report (.1).	rs		0.30	\$0.00
07/13/2023	(No charge) Email to attorney for Prestige regarding acceptance of service on behalf of Prestige.	rs		0.10	\$0.00
07/14/2023	Reviewing amended complaint against Prestige by class (.2); reviewing draft complaint by Receiver against Prestige (.8); telephone calls regarding same (.2).	MME	\$550.00	1.20	\$660.00
07/14/2023	Review proposal from Demolition Gods.	PFV	\$550.00	0.20	\$110.00
07/14/2023	Draft status report to the Receiver regarding Demolition Gods updated proposal.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Review demand from laundry equipment company.	PFV	\$550.00	0.20	\$110.00
07/14/2023	Draft status report to Receiver regarding same and other payables and claims.	PFV	\$550.00	0.30	\$165.00
07/14/2023	Analyze potential claims of third parties and impact on receivership in light of termination of association.	PFV	\$550.00	1.10	\$605.00
07/14/2023	Status conference with receiver regarding class action claims including analysis of claims against Prestige Management and analysis of claims made by the Thomas class.	PFV	\$550.00	1.10	\$605.00
07/14/2023	Draft email to general liability carrier regarding status of Whitfield case and notice as to Thomas case.	PFV	\$550.00	0.20	\$110.00
07/14/2023	Review email from Deutsche bank's counsel.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Review proposed stipulation of dismissal as to a lender in partition action.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Draft email to Deutsche Bank's counsel regarding proposed stipulation and consent.	PFV	\$550.00	0.20	\$110.00
07/14/2023	Draft email to R. Zelman regarding same.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Review answer and affirmative defenses of Amerifirst.	PFV	\$550.00	0.20	\$110.00
07/14/2023	Review email from real estate counsel regarding prior owner disclaimer of homestead regarding unit 129 and draft response.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Additional email with real estate lawyer regarding mortgage matters.	PFV	\$550.00	0.10	\$55.00
07/14/2023	Review Thunder Demolition proposal and proposed fine print terms (.2); and draft email to Receiver regarding same (.1).	PFV	\$550.00	0.30	\$165.00
07/14/2023	Email with co-counsel regarding request for information concerning research regarding special assessments.	PFV	\$550.00	0.30	\$165.00
07/14/2023	Meet with Allied Demolition.	dj	\$120.00	1.00	\$120.00
07/16/2023	Analyze answer and affirmative defenses filed by mortgagee of units 218/219 in preparation of working on reply to same in partition action.	MJL	\$350.00	0.20	\$70.00

07/17/2023	Analyze answers filed in partition action from mortgagee of Bermudez (0.2); same for mortgagee of Stewart (0.2).	MJL	\$350.00	0.20	\$70.00
07/17/2023	Work on motion to transfer lawsuit against Prestige from CA32 to CA11 regarding Gersten v. Prestige case (0.6); email communications with the Receiver regarding same (0.1).	MJL	\$350.00	0.70	\$245.00
07/17/2023	Review motion to transfer Gersten v. Prestige case.	PFV	\$550.00	0.20	\$110.00
07/17/2023	Email with project manager regarding demolition proposals.	PFV	\$550.00	0.20	\$110.00
07/17/2023	Review Ocwen response to complaint.	PFV	\$550.00	0.10	\$55.00
07/18/2023	Meeting with co-counsel to discuss status and strategy for partition, demolition, and third-party claims.	MME	\$550.00	0.70	\$385.00
07/18/2023	Conference with real estate lawyer regarding title issues.	PFV	\$550.00	0.30	\$165.00
07/18/2023	Review Allied demolition proposal and draft email to Receiver regarding status.	PFV	\$550.00	0.40	\$220.00
07/18/2023	Email regarding estimated permit fees for demolition.	PFV	\$550.00	0.20	\$110.00
07/18/2023	Analyze class claims and conference with M. Damian regarding same.	PFV	\$550.00	1.20	\$660.00
07/19/2023	Work on motion to demolish the building and to approve loan certificate with focus on background information (0.6); same with focus on requested relief (0.7); work on loan certificate to be attached to same (0.4); work on proposed order granting above-referenced motion (0.4).	MJL	\$350.00	2.10	\$735.00
07/19/2023	Email with project manager and Receiver regarding Thunder demolition proposal.	PFV	\$550.00	0.20	\$110.00
07/19/2023	Confer with broker regarding value increase that would be created by demolition.	PFV	\$550.00	0.50	\$275.00
07/19/2023	Work on motion to approve demolition and additional loan.	PFV	\$550.00	0.60	\$330.00
07/19/2023	Review and analyze memorandum regarding potential liability of association and assessment issues.	PFV	\$550.00	0.50	\$275.00
07/19/2023	Review and revise list of missing waivers in partition action (.2); update list of owners to add as defendants to complaint (.3).	rs	\$100.00	0.50	\$50.00
07/20/2023	Meeting with counsel for class and co-counsel regarding claims.	MME	\$550.00	0.50	\$275.00
07/20/2023	Attend conference with counsel in the rental class (1.3); and with co-counsel (.5); regarding claims against Prestige and potential claims against the Association.	PFV	\$550.00	1.80	\$990.00
07/20/2023	Email regarding demolition quotes.	PFV	\$550.00	0.20	\$110.00
07/20/2023	Email with Thunder regarding bid receipt and next steps.	PFV	\$550.00	0.20	\$110.00
07/20/2023	Email from Prestige's counsel regarding acceptance of service of process and response to request for documents.	PFV	\$550.00	0.20	\$110.00
07/20/2023	Additional meeting with Allied Demolition.	dj	\$120.00	1.00	\$120.00

07/24/2023	Analyze unit owner contact list in preparation of communications with R. Zelman regarding same (0.1); email communications with R. Zelman regarding contact information for owners of unit 106 (0.1); same for owners of unit 108 (0.1).	MJL	\$350.00	0.30	\$105.00
07/24/2023	Email regarding motion to approve additional funding and demolition.	PFV	\$550.00	0.30	\$165.00
07/25/2023	Emails regarding financing (.2); emails regarding paying invoices (.2); e-mails regarding request from Prestige and response (.2).	MME	\$550.00	0.60	\$330.00
07/25/2023	Email regarding payment of estimator's invoice.	PFV	\$550.00	0.10	\$55.00
07/25/2023	Email with counsel for US Bank National Association, as Trustee for Chalet Series III Trust regarding request for disclaimer of interest.	PFV	\$550.00	0.20	\$110.00
07/25/2023	Review email from real estate counsel regarding title issues.	PFV	\$550.00	0.10	\$55.00
07/26/2023	Email with Demolition Gods regarding follow up as to bid for demolition services.	PFV	\$550.00	0.20	\$110.00
07/28/2023	Emails with potential lender.	MME	\$550.00	0.20	\$110.00
07/28/2023	Call with Rick Zelman regarding title related matters.	PFV	\$550.00	0.30	\$165.00
07/28/2023	Draft email regarding contact list.	PFV	\$550.00	0.10	\$55.00
07/28/2023	Draft letter to unit owners regarding introduction.	PFV	\$550.00	0.20	\$110.00
07/28/2023	Review answer of New Residential.	PFV	\$550.00	0.10	\$55.00
07/28/2023	Review motion to dismiss in Whitfield case.	PFV	\$550.00	0.30	\$165.00
07/28/2023	Draft email to Receiver regarding same.	PFV	\$550.00	0.10	\$55.00
07/28/2023	Managing resident access and recovery of possessions and work on lawn care maintenance and clean up of the property.	dj	\$120.00	5.00	\$600.00
07/29/2023	Managing resident access and recovery of possessions and work on lawn care maintenance.	dj	\$120.00	3.00	\$360.00
07/31/2023	Work on owner contact list with focus on removing tenant contact information from same in preparation of sending same to R. Zelman regarding partition action (0.3); email communications with R. Zelman regarding same (0.2); work on list of new defendants and defendants to drop from first complaint, including analysis of answers to complaint and waivers of service of process (0.6); work on list of defendants that have not yet been served and that have not signed a waiver, including analysis of above-referenced documents (0.7); analyze title search in preparation of working on list defendants which must still be added as named parties to the lawsuit (0.4).	MJL	\$350.00	2.20	\$770.00
07/31/2023	Email communications with opposing counsel regarding documents which defendant provided to Receiver regarding Receiver v. Prestige case.	MJL	\$350.00	0.40	\$140.00
07/31/2023	Reviewing prestige motion to dismiss and discuss claims and defenses with P. Valori (.5); telephone calls and emails with lender regarding facility to do demolition (.4); reviewing liens and e-mails regarding same (.3).	MME	\$550.00	1.20	\$660.00
07/31/2023	Review email regarding production of Prestige records.	PFV	\$550.00	0.10	\$55.00

07/31/2023	Conference regarding demand to Prestige insurance company.	PFV	\$550.00	0.10	\$55.00
07/31/2023	Review lien asserted by roofing company.	PFV	\$550.00	0.30	\$165.00
07/31/2023	Draft email regarding proposed strategy regarding same.	PFV	\$550.00	0.50	\$275.00
07/31/2023	Conference with M. Damian regarding same.	PFV	\$550.00	0.20	\$110.00
07/31/2023	Review court file regarding partition case (.2); work on extension to effectuate service on defendants (.1); email to owner regarding additional waivers for all owners of the unit (.2).	rs	\$100.00	0.50	\$50.00
08/01/2023	[Partition Action] Work on amended complaint with focus on revisions to Exhibit B (0.7); work on letter to unit owners introducing R. Zelman (0.6); email communications with D. Heimberg regarding posting same on receivership website (0.1); email communications to unit owners regarding same (0.2); prepare same letter to be sent via mail to the unit owners which we do not have email addresses for (0.2); email communications with R. Zelman regarding same (0.1); work on motion for extension of time to serve process upon defendants (0.3); work on proposed order granting same (0.3); analyze mechanic's lien in preparation of working on demand letter to roofers (0.1); analysis of official records referenced in mechanic's lien in preparation of same (0.2); analysis of order appointing receiver in preparation of same (0.1); analysis of Florida Statutes regarding mechanic's lien in preparation of same (0.3); work on demand letter with focus on violation of order appointing receiver (0.3); same with focus on forged notice of commencement (0.2); same with focus of mechanic's lien being untimely filed (0.2).	MJL	\$350.00	3.90	\$1,365.00
08/01/2023	Review background information regarding amended complaint to capture additional interested parties in style of the case for purposes of obtaining clean title.	PFV	\$550.00	0.60	\$330.00
08/02/2023	[Partition Action] Work on motion for extension of time to serve respondents including making a spreadsheet of relevant information (0.5); work on demand letter to roofers with focus on defective legal description of property (0.4); same with focus on defective reference to unit 214 (0.4); same with focus on investigation concerning cause of fire (0.3).	MJL	\$350.00	1.60	\$560.00
08/02/2023	Work on motion to transfer in case against Prestige.	MJL	\$350.00	0.20	\$70.00
08/02/2023	Working on financing for demolition.	MME	\$550.00	0.50	\$275.00
08/02/2023	Review and revise motion for extension to service process.	PFV	\$550.00	0.20	\$110.00
08/03/2023	Working on financing for demolition.	MME	\$550.00	0.20	\$110.00
08/03/2023	Email with counsel for US bank regarding extension for response.	PFV	\$550.00	0.10	\$55.00
08/03/2023	Work on zoom for owner's meeting.	rs	\$100.00	0.10	\$10.00
08/04/2023	Managing resident access and recovery of possessions.	dj	\$120.00	5.00	\$600.00
08/04/2023	Reviewing and revising motion to approve extension regarding service.	MME	\$550.00	0.30	\$165.00

08/06/2023	Work on proposed order granting motion for extension of time to serve process upon respondents in partition action (0.2); email communications with the Receiver regarding demand letter to roofers (0.1).	MJL	\$350.00	0.30	\$105.00
08/06/2023	Review answer to partition complaint regarding unit #236.	PFV	\$550.00	0.20	\$110.00
08/06/2023	Email regarding request for percentage ownership information regarding counsel for unit 236.	PFV	\$550.00	0.10	\$55.00
08/06/2023	Work on demand letter to remove lien.	PFV	\$550.00	0.40	\$220.00
08/07/2023	Email communications with the Receiver regarding motion for extension of time to serve process upon respondents in partition action and proposed order granting same (0.1); work on motion for extension of time and proposed order with focus on finalizing same (0.1).	MJL	\$350.00	0.20	\$70.00
08/07/2023	Review order on motion for extension to serve process in partition action.	PFV	\$550.00	0.10	\$55.00
08/08/2023	Email communications with K. Stantz regarding unit owners' percentages of interest in common elements of the association.	MJL	\$350.00	0.10	\$35.00
08/08/2023	Conference regarding request by Mr. Leguerre for access to prohibited area.	PFV	\$550.00	0.10	\$55.00
08/08/2023	Review answer of Pierre Louis to partition complaint.	PFV	\$550.00	0.10	\$55.00
08/08/2023	Draft email to Mr. Stanz regarding request for access to Unit 236.	PFV	\$550.00	0.10	\$55.00
08/08/2023	Analyze potential claims and defenses and draft status memorandum regarding conference with Dwayne Robinson to Receiver.	PFV	\$550.00	0.60	\$330.00
08/08/2023	Continued efforts to schedule next zoom owners' meeting (.2); review and analyze waivers received to date (.2); email regarding partition action (.1).	rs	\$100.00	0.50	\$50.00
08/09/2023	Telephone call with potential lender regarding security and payment financing needed for demolition.	MME	\$550.00	0.80	\$440.00
08/09/2023	Conference with R. Zelman regarding adding spouses of prior title holders regarding title insurance commitment and potential service by publication and review service by publication requirements.	PFV	\$550.00	0.50	\$275.00
08/09/2023	Email with counsel for Mr. Leguerre regarding additional request for access.	PFV	\$550.00	0.30	\$165.00
08/09/2023	Email regarding response to Jared Kallman regarding unit 237 inquiry about sale plans.	PFV	\$550.00	0.20	\$110.00
08/09/2023	Review response to motion to dismiss in Whitfield case.	PFV	\$550.00	0.40	\$220.00
08/10/2023	[Partition Action] Email communications with J. Kellerman regarding partition action and potential sale of property.	MJL	\$350.00	0.10	\$35.00
08/10/2023	Conference with Receiver and team regarding status and planning regarding Prestige.	PFV	\$550.00	0.70	\$385.00
08/10/2023	Review email regarding non-signing spouse in chain of title regarding Feel Miami Beach Corp Deed.	PFV	\$550.00	0.10	\$55.00
08/10/2023	Email to and from webmaster regarding new website posting (.1); prepare notice to owners regarding next zoom meeting in partition action (.1).	rs	\$100.00	0.20	\$20.00

08/12/2023	Managing resident access and recovery of possessions.	dj	\$120.00	8.00	\$960.00
08/12/2023	Communications with project manager regarding make up unit access and related matters.	PFV	\$550.00	0.20	\$110.00
08/13/2023	Managing resident access and recovery of possessions.	dj	\$120.00	7.50	\$900.00
08/13/2023	Review summary of financial records.	PFV	\$550.00	0.10	\$55.00
08/13/2023	Draft email regarding same and quarterly report.	PFV	\$550.00	0.10	\$55.00
08/13/2023	Call with project manger regarding unit 245 move out issues.	PFV	\$550.00	0.20	\$110.00
08/13/2023	Email regarding move our status and procedures.	PFV	\$550.00	0.30	\$165.00
08/14/2023	Work on Receiver's second report with focus on introduction (0.2); same with focus on appointment and duties of Receiver (0.1); same with focus on Receiver's employment of professionals (0.2); same with focus on efforts obtaining financial records and securing assets (0.2); same with focus on taking over the Association's business operations (0.2); same with focus on retrieval of belongings (0.2); same with focus on written notice required for repairs (0.2); same with focus on Whitfield class action (0.2); same with focus on Thomas class action (0.2); same with focus on Valtom litigation (0.2); same with focus on Forty Year Investment litigation (0.2); same with focus on Deutsche Bank action (0.2); same with focus on mechanic's lien (0.3); same with focus on partition action (0.3); same with focus on lawsuit brought by Receiver against former property management company (0.2); same with focus on plan moving forward (0.2); same with focus on conclusion section (0.1); analyze invoices from our law firm for work performed from April to June 2023 in preparation of working on the Receiver's fee application (0.3).	MJL	\$350.00	3.70	\$1,295.00
08/14/2023	Work on periodic report of the Receiver to the court.	PFV	\$550.00	1.40	\$770.00
08/14/2023	Work on back up documentation for periodic report of Receiver.	PFV	\$550.00	0.80	\$440.00
08/14/2023	Email regarding untimely requests for property access.	PFV	\$550.00	0.20	\$110.00

08/15/2023	Analyze invoices from the Receiver's law firm for work performed from April to June 2023 in preparation of working on fee application (0.3); analyze invoices from DVC for work performed during same time period in preparation of same (0.2); analyze invoices from R. Zelman's law firm for work performed from May to July 2023 in preparation of same (0.2); work on standardized fund accounting report to be attached to fee application, including analysis of the firm's income and expenses to date, in preparation of same (0.6); work on excel spreadsheet of fees and costs in preparation of working on proposed order granting Receiver's fee application in preparation of same (0.3); work on fee application with focus on total amounts invoiced during relevant time periods (0.6); same with focus on deferral of payment (0.3); work on proposed order granting same (0.3); email communications with the Receiver regarding his law firm's July invoice (0.1); telephone call with E. Thompson regarding same (0.1); work on above-referenced proposed order with focus on revisions regarding payment deferral (0.3); work on Receiver's second report with focus on revisions to introduction section in preparation of filing same (0.3); email communications with Receiver regarding the filing of his second report (0.1).	MJL	\$350.00	3.70	\$1,295.00
08/15/2023	Telephone calls and emails regarding terms of loan.	MME	\$550.00	0.60	\$330.00
08/15/2023	Review email regarding unit 106 title matters.	PFV	\$550.00	0.20	\$110.00
08/15/2023	Work on revisions to periodic report to the court.	PFV	\$550.00	0.80	\$440.00
08/15/2023	Email regarding litigation planning as to roofer notice of lien.	PFV	\$550.00	0.30	\$165.00
08/16/2023	Work on loan certificate (0.2); work on motion to approve loan certificate and demolition (0.3); work on proposed order granting same (0.2).	MJL	\$350.00	0.70	\$245.00
08/16/2023	Telephone calls and emails regarding terms of loan and call to finalize motion.	MME	\$550.00	0.40	\$220.00
08/16/2023	Draft subpoena and notice of taking deposition.	rs	\$100.00	0.50	\$50.00
08/17/2023	Email communications with the Receiver regarding filing of the motion to approve loan certificate (0.1); telephone call with D. Marin regarding service of process in partition action (0.1); analyze demand letter to roofers in preparation of working on subpoena duces tecum to same (0.2); work on subpoena duces tecum to E. Phillips (0.9).	MJL	\$350.00	1.30	\$455.00
08/17/2023	Reviewing order and email to lender regarding same.	MME	\$550.00	0.20	\$110.00
08/17/2023	Review order on motion to allow demolition and to allow additional funding.	PFV	\$550.00	0.20	\$110.00
08/18/2023	Email to lender regarding Court's Order and follow-up call.	MME	\$550.00	0.20	\$110.00

08/18/2023	Analyze answers and affirmative defenses filed in partition action in preparation of working on amended complaint (0.7); analyze waivers of service in preparation of same (0.4); analyze title search in preparation of same (0.6); work on amended complaint with focus on revisions to list of lenders to be attached thereto (0.7); same with focus on revisions to list of unit owners to be attached thereto (0.8).	MJL	\$350.00	3.20	\$1,120.00
08/18/2023	Review Prestige's reply in support of its motion to dismiss in the Whitfield case.	PFV	\$550.00	0.30	\$165.00
08/18/2023	Email regarding unit 237 service of process and possible bankruptcy claims.	PFV	\$550.00	0.20	\$110.00
08/21/2023	Email communications with counsel for Forty Year Investment, LLC regarding dismissal of its claims against the Association.	MJL	\$350.00	0.10	\$35.00
08/21/2023	Email with counsel for renters regarding Prestige cases.	PFV	\$550.00	0.20	\$110.00
08/21/2023	Review email from Plaintiff's counsel regarding 40 Year v. Prestige et al. (.1); and draft response (.1); and draft status email to Receiver regarding same (.1).	PFV	\$550.00	0.30	\$165.00
08/21/2023	Email regarding demolition contract.	PFV	\$550.00	0.20	\$110.00
08/21/2023	Conference with co-counsel regarding demolition contract and related matters (.5); and conference with co-counsel regarding defense of claims against the association and rights and/or obligations of the association to assess (.6).	PFV	\$550.00	1.10	\$605.00
08/21/2023	Draft email to Receiver regarding demolition contracts.	PFV	\$550.00	0.30	\$165.00
08/21/2023	Call with project manager regarding demolition bids.	PFV	\$550.00	0.30	\$165.00
08/21/2023	Email with Demolition Gods regarding proof of insurance and license.	PFV	\$550.00	0.20	\$110.00
08/21/2023	Additional email with counsel for 40 Year.	PFV	\$550.00	0.20	\$110.00
08/22/2023	Meet with unit owners via Zoom to discuss updates on the receivership case and related cases (1.5); email communications with L. Baptiste regarding names of security companies paid by the Association (0.1).	MJL	\$350.00	1.60	\$560.00
08/22/2023	Call with R. Zelman regarding title matters.	PFV	\$550.00	0.30	\$165.00
08/22/2023	Email regarding collection of assessments from bankrupt parties.	PFV	\$550.00	0.30	\$165.00
08/22/2023	Prepare for unit owner meeting.	PFV	\$550.00	0.30	\$165.00
08/22/2023	Conference with unit owners regarding status.	PFV	\$550.00	1.70	\$935.00
08/22/2023	Email to adjuster regarding Thomas and Forty Year cases.	PFV	\$550.00	0.30	\$165.00
08/22/2023	Draft status report to Receiver.	PFV	\$550.00	0.10	\$55.00
08/22/2023	Conference with M. Levine regarding litigation planning as to class action cases and amendment to partition action.	PFV	\$550.00	0.40	\$220.00

08/23/2023	Work on revisions to list of unit owners to be attached to amended complaint with focus on those with remainder interest in units (0.9); analyze disclaimer of interest filed by lender for unit 245 in preparation of working on memorandum to R. Zelman regarding same (0.3); work on memorandum to R. Zelman regarding the removal/addition of certain respondents in the partition action with focus on the foregoing lender (0.4).	MJL	\$350.00	1.60	\$560.00
08/23/2023	Review email from general liability carrier regarding Thomas case.	PFV	\$550.00	0.10	\$55.00
08/23/2023	Review complaint in Thomas case and draft response to carries.	PFV	\$550.00	0.30	\$165.00
08/23/2023	Review bid and confer with project manager regarding bid evaluation.	PFV	\$550.00	0.80	\$440.00
08/23/2023	Conference with counsel for Receiver regarding property issues and demolition project preparations.	dj	\$120.00	1.00	\$120.00
08/24/2023	Review summons requests for non-waiver Defendants.	PFV	\$550.00	0.20	\$110.00
08/24/2023	Review answer as to Unit 203.	PFV	\$550.00	0.20	\$110.00
08/24/2023	Draft summonses to be issued on individual and corporate defendants.	rs	\$100.00	1.00	\$100.00
08/25/2023	Email regarding unit owner reconciliations.	PFV	\$550.00	0.10	\$55.00
08/25/2023	Conference regarding Mr. Smalls and account balance, lien rights and related matters as well as impact of bankruptcy filing.	PFV	\$550.00	0.40	\$220.00
08/28/2023	Review status report in Whitfield case.	PFV	\$550.00	0.30	\$165.00
08/28/2023	Conference with counsel for Plaintiff in Thomas case regarding Prestige claims.	PFV	\$550.00	0.20	\$110.00
08/28/2023	Draft status report to receiver.	PFV	\$550.00	0.20	\$110.00
08/29/2023	Call with Lindsay from Demolition Gods regarding demolition work.	PFV	\$550.00	0.10	\$55.00
08/29/2023	Email with Demolition Gods.	PFV	\$550.00	0.10	\$55.00
08/29/2023	Draft status report regarding demolition.	PFV	\$550.00	0.10	\$55.00
08/29/2023	Email regarding response regarding Prestige cases.	PFV	\$550.00	0.20	\$110.00
08/29/2023	Email with R. Zelman regarding satisfactions of judgment in favor of the association.	PFV	\$550.00	0.20	\$110.00
08/29/2023	Email regarding Zenovia Anderson request for access to prohibited units.	PFV	\$550.00	0.30	\$165.00
08/30/2023	Work on memorandum to R. Zelman regarding certain respondents in the partition action with focus on the removal of certain respondents, including analysis of public records and court filings regarding same (1.3); same with focus on the addition of certain respondents, including analysis of public records and court filings regarding same (1.4); email communications with D. Marin regarding service of process upon respondents which did not sign a waiver of service (0.1); telephone call with D. Marin regarding same (0.1).	MJL	\$350.00	2.90	\$1,015.00

08/30/2023	Work on memorandum to R. Zelman regarding the removal/addition of certain respondents in the partition action with focus on power of attorney submitted with waiver of service for unit 217, including analysis of such document and deed to subject unit (0.4); same with focus on deceased unit owners for units 220/221, 224/225, 234, and 243, including analysis of deeds and other related documents concerning same (0.7); same with focus on J. Garzon, including analysis of deed to subject property and marriage license search via Miami-Dade County Clerk of Court website (0.6); same with focus on I. King as respondent in partition action, including analysis of deed to subject property, mortgages, and marriage license search via Miami-Dade County Clerk of Court website (0.6); same with focus on R. Beepot as respondent in partition action, including analysis of deed to subject property, mortgages related to same, and marriage license search via Miami-Dade County Clerk of Court website (0.6); same with focus on those with remainder interest in Units 123/124 as respondents in partition action, including analysis of deed to subject property (0.4); same with focus on S. Gallego as respondent in partition action, including analysis of deed to subject property (0.3); same with focus on K. Chavarria as respondent in partition action, including analysis of deed to subject property (0.3); same with focus on those with remainder interest in unit 211 as respondents in partition action, including analysis of deed to subject property (0.3).	MJL	\$350.00	4.20	\$1,470.00
08/30/2023	Call with demolition company.	PFV	\$550.00	0.30	\$165.00
08/30/2023	Review revised bid.	PFV	\$550.00	0.20	\$110.00
08/30/2023	Email regarding demolition company.	PFV	\$550.00	0.40	\$220.00
08/30/2023	Work on memorandum regarding addition/removal of respondents.	PFV	\$550.00	0.50	\$275.00
08/30/2023	Review email regarding summonses and service of process status.	PFV	\$550.00	0.20	\$110.00
08/30/2023	Email regarding authority to release judgments if necessary.	PFV	\$550.00	0.10	\$55.00
08/30/2023	Email to process server regarding summonses issued on individual and corporate defendants (.8); email to counsel regarding acceptance of service in partition action (.2)	rs	\$100.00	1.00	\$100.00
08/31/2023	Email communications with R. Zelman regarding the removal/addition of respondents in the partition action (0.2); telephone call with D. Marin regarding service of process for respondents in partition action (0.2); email communications with D. Marin regarding same (0.1).	MJL	\$350.00	0.50	\$175.00
08/31/2023	Conferences with demolition company regarding scope of work and related matters.	PFV	\$550.00	0.40	\$220.00
08/31/2023	Review revised proposal.	PFV	\$550.00	0.20	\$110.00
08/31/2023	Draft email regarding same.	PFV	\$550.00	0.20	\$110.00
08/31/2023	Draft email regarding posting of notice of demolition.	PFV	\$550.00	0.20	\$110.00
08/31/2023	Email with counsel for Thomas Group.	PFV	\$550.00	0.20	\$110.00

09/01/2023	Work on acceptance of service of process by attorney for Defendant Cordell Black (.1); email to process server regarding same in partition action (.1).	rs	\$100.00	0.20	\$20.00
09/04/2023	Email communications with R. Zelman regarding documents linked in August 30, 2023 memorandum (0.1); work on memorandum to R. Zelman regarding updated information concerning Unit 115 and Units 218/219 (0.4).	MJL	\$350.00	0.50	\$175.00
09/04/2023	Email regarding unit 115 title matters regarding release of lien.	PFV	\$550.00	0.20	\$110.00
09/05/2023	Email communications with J. Hekkanen and R. Zelman regarding satisfaction of mortgage for unit 115 (0.1); analyze defendant's motion for a more definite statement filed in the Prestige action in preparation of working on response to same (0.2); analyze motion to transfer Prestige case in preparation of tomorrow's hearing on same (0.1).	MJL	\$350.00	0.40	\$140.00
09/05/2023	[No charge] Emails to and from process server regarding summonses in partition action.	rs		0.30	\$0.00
09/05/2023	Conference with Dwayne Robinson regarding possible resolution of Prestige matters.	PFV	\$550.00	0.60	\$330.00
09/05/2023	Email with Receiver regarding skip trace approvals for four defendants in partition case.	PFV	\$550.00	0.20	\$110.00
09/05/2023	Email regarding response to motion for more definite statement.	PFV	\$550.00	0.10	\$55.00
09/06/2023	Telephone call with R. Zelman regarding power of attorney (0.2); email communications with same regarding removal of lender for unit 115 as respondent in partition action (0.1); email communications with same regarding removal of former owner of units 218/219 as respondent in partition action (0.1).	MJL	\$350.00	0.40	\$140.00
09/06/2023	Discuss demand to Prestige with co-counsel.	MME	\$550.00	0.30	\$165.00
09/06/2023	Review defendants with no alternative addresses (.3); emails to and from process server regarding same in partition action (.2); receipt and review of order granting motion to transfer in case against Prestige (.1).	rs	\$100.00	0.60	\$60.00
09/06/2023	Prepare for (.2); and attend (.3); transfer hearing regarding Gersten v. Prestige case.	PFV	\$550.00	0.50	\$275.00
09/06/2023	Call with Demo God's representative regarding status and planning.	PFV	\$550.00	0.30	\$165.00
09/06/2023	Email regarding 811 utility access and marking.	PFV	\$550.00	0.30	\$165.00
09/06/2023	Email regarding tradesman and arborist and asbestos inspector access.	PFV	\$550.00	0.10	\$55.00
09/06/2023	Email regarding update of website regarding property demolition.	PFV	\$550.00	0.20	\$110.00
09/06/2023	Prepare update regarding Prestige cases.	PFV	\$550.00	0.10	\$55.00
09/06/2023	Conference with M. Damian regarding settlement demand planning regarding Prestige cases.	PFV	\$550.00	0.20	\$110.00
09/06/2023	Conference with counsel for the Thomas Plaintiffs.	PFV	\$550.00	0.20	\$110.00
09/06/2023	Draft joint demand letter to Prestige.	PFV	\$550.00	0.40	\$220.00
09/06/2023	Review order granting motion to transfer.	PFV	\$550.00	0.10	\$55.00

09/06/2023	Email regarding skip traces and additional service of process issues on unlocated unit owners.	PFV	\$550.00	0.20	\$110.00
09/07/2023	Review alternate addresses for specific defendants (.2); emails to process server regarding service of summonses on alternate addresses (.3); draft proposed website post regarding expiration of property retrieval period in partition action (.2).	rs	\$100.00	0.70	\$70.00
09/07/2023	Email communications with D. Marin regarding alternate addresses for unit owners who have not been served process in the partition action (0.1); work on language to be added to the receivership website regarding removal of personal items from units (0.1); work on notice of demolition to be filed in receivership case (0.5); work on notice of demolition to be filed in partition action (0.3); work on notice regarding demolition to be posted on receivership website and sent to unit owners and other interested parties via email (0.2); analyze July 5, 2023 correspondence from insurer of Prestige Management Solutions, Inc. in preparation of working on demand to same insurer (0.2); analyze August 21, 2023 correspondence from same insurer in preparation of same (0.2); analyze declarations page for general liability policy in preparation of same (0.1); analyze same for professional liability policy in preparation of same (0.1).	MJL	\$350.00	1.80	\$630.00
09/07/2023	Review notice of intent to move forward with demolition process.	PFV	\$550.00	0.20	\$110.00
09/07/2023	Review notice regarding no further access without special request.	PFV	\$550.00	0.20	\$110.00
09/07/2023	Emails to and from Peter Valori regarding claims against Prestige Management Solutions; conference with Morgan Levine regarding same; begin reviewing correspondence between Prestige Management Solutions and Hiscox Insurance Company, complaints against Prestige Management Solutions and Hiscox Errors & Omissions and General Liability Policies.	TAC	\$550.00	1.30	\$715.00
09/08/2023	Analyze contract between association and roofer in preparation of working on demand to Prestige Management Solutions, Inc.'s insurer (0.1); analyze notice of commencement in preparation of same (0.1); analyze communications with forensic fire investigator to determine findings as to cause of fire in preparation of same (0.3); work on notice of demolition to be filed in receivership action (0.3); email communications with Receiver regarding same (0.1).	MJL	\$350.00	0.90	\$315.00
09/08/2023	Email regarding joint demand letter.	PFV	\$550.00	0.20	\$110.00
09/08/2023	Continue reviewing correspondence between Prestige Management Solutions and Hiscox Insurance Company, complaints against Prestige Management Solutions and Hiscox Errors & Omissions and General Liability policies; draft demand letter to Joseph Downs.	TAC	\$550.00	1.00	\$550.00
09/11/2023	Draft email regarding notice of filing waivers.	PFV	\$550.00	0.10	\$55.00
09/11/2023	Draft email regarding owner Zoom meeting with unit owners.	PFV	\$550.00	0.10	\$55.00

09/11/2023	Review Chase Bank's answer and affirmative defenses on multiple units.	PFV	\$550.00	0.20	\$110.00
09/11/2023	Review Prestige scheduling order.	PFV	\$550.00	0.20	\$110.00
09/11/2023	Call with Mr. Baptiste.	PFV	\$550.00	0.20	\$110.00
09/11/2023	Emails regarding notice of filing waivers of service of summons and proposed language to post to website regarding demolition.	rs	\$100.00	0.20	\$20.00
09/12/2023	Revising Receiver's certificate to attempt to close on demolition financing.	MME	\$550.00	0.50	\$275.00
09/12/2023	Analyze updated case law regarding standing in partition action in preparation of working on amendments to complaint (0.7); analyze updated case law regarding receiver's standing to file claims for a receivership estate in preparation of same (0.9); analyze receivership order with focus on provisions related to same in preparation of same (0.3); analyze fire code violations in preparation of same (0.3).	MJL	\$350.00	2.20	\$770.00
09/12/2023	Review notice of filing waivers.	PFV	\$550.00	0.10	\$55.00
09/12/2023	Email regarding waiver of service on unit 106.	PFV	\$550.00	0.20	\$110.00
09/13/2023	Email communications with receiver regarding notice of demolition to be filed in receivership action (0.1); work on notice of demolition to be filed in partition action (0.1); email communications with Receiver regarding same (0.1).	MJL	\$350.00	0.30	\$105.00
09/13/2023	Review notices of demolition.	PFV	\$550.00	0.20	\$110.00
09/13/2023	Draft email regarding same.	PFV	\$550.00	0.10	\$55.00
09/13/2023	Email regarding asbestos inspection.	PFV	\$550.00	0.20	\$110.00
09/13/2023	Review email regarding title issues as to unit 107.	PFV	\$550.00	0.10	\$55.00
09/14/2023	Email to webmaster regarding new website posting (.2); continue analyzing corporate waivers (.2); draft notice of filing waivers (.2); emails to and from process server regarding alternate addresses for service in partition action (.2).	rs	\$100.00	0.80	\$80.00
09/14/2023	Work on notice of demolition to be posted on the receivership website (0.2); communications with R. Zelman regarding amendments to complaint in receivership action (1.1); work on list of unit owners to be attached to the amended partition complaint with focus on revisions as to deceased owners (0.3); same with focus on spouses of unit owners not referenced in deed, including investigation into identities of such spouses (1.2); work on amendments to style of case (0.6); email communications with R. Zelman regarding most recent deed to unit 107 and whether amendments to complaint must be made due to same (0.2).	MJL	\$350.00	3.60	\$1,260.00
09/14/2023	Review notice of filing waivers.	PFV	\$550.00	0.20	\$110.00
09/14/2023	Review email regarding unit number list for power disconnect regarding demolition.	PFV	\$550.00	0.10	\$55.00
09/15/2023	Work on letter to L. Baptiste's lender regarding maintenance payments.	MJL	\$350.00	0.90	\$315.00

09/15/2023	Conference with M. Levine regarding response to Baptiste lender.	PFV	\$550.00	0.30	\$165.00
09/16/2023	Review and revise letter regarding request from third party mortgage company regarding maintenance obligation.	PFV	\$550.00	0.30	\$165.00
09/16/2023	Email with third party mortgage company regarding same.	PFV	\$550.00	0.10	\$55.00
09/16/2023	Email with Receiver regarding same.	PFV	\$550.00	0.10	\$55.00
09/16/2023	Email regarding reconciliation of unit owner accounts and related matters.	PFV	\$550.00	0.30	\$165.00
09/16/2023	Email regarding service of notice of demolition in New World case.	PFV	\$550.00	0.10	\$55.00
09/17/2023	Conference regarding service of process of notice to demolish.	PFV	\$550.00	0.20	\$110.00
09/17/2023	Conference regarding service upon other Defendants.	PFV	\$550.00	0.20	\$110.00
09/17/2023	Work on joint demand letter upon Prestige insurer.	PFV	\$550.00	0.40	\$220.00
09/18/2023	Revising demand letter to Prestige and discuss same with P. Valori (.8); closing loan and funding demolition (.4).	MME	\$550.00	1.20	\$660.00
09/18/2023	Work on notice of demolition (.1); work on partition action and receivership action (.3); emails to and from process server regarding update on service of complaint to defendants in partition action (.2).	rs	\$100.00	0.60	\$60.00
09/19/2023	Discuss partition action logistics with P. Valori and need for Receivership aspects of final order.	MME	\$550.00	0.40	\$220.00
09/19/2023	Work on demand to Prestige Management Solutions, Inc. regarding policy limits (0.2); email communications with Receiver and R. Zelman regarding letter to L. Baptiste's lender (0.1); work on proposed order on fees in the receivership case (0.1); email communications with the Receiver regarding same (0.1).	MJL	\$350.00	0.50	\$175.00
09/19/2023	Work on amendments to complaint with focus on spouses of unit owners, including analysis of deeds which reference whether owners are married and investigation into same via Accurint and/or Miami-Dade County Clerk of Court website.	MJL	\$350.00	3.60	\$1,260.00
09/19/2023	Analyze standing matters and review and analyze imposition of fines and tax identification numbers.	PFV	\$550.00	0.30	\$165.00
09/19/2023	Conference with insurance coverage counsel.	PFV	\$550.00	0.70	\$385.00
09/19/2023	[No charge] Review order granting Fee Application.	PFV		0.20	\$0.00
09/19/2023	Work on Baptiste lender letter.	PFV	\$550.00	0.20	\$110.00
09/19/2023	Work on joint demand letter to insurer.	PFV	\$550.00	0.20	\$110.00
09/19/2023	Work on service of notice of demolition to all defendants via email or U.S. mail (.5); add defendants' email addresses for service of court documents to the E-filing portal in partition action and in receivership action (.5).	rs	\$100.00	1.00	\$100.00

09/20/2023	Analyze order granting fee application in preparation of contacting chambers regarding the "proposed" language set forth in the title of the order (0.1); email communications with Z. Anderson regarding quit claim deed recorded on May 16, 2023 and marital status (0.3); email communications with R. Zelman regarding same (0.1); email communications with P. Resnick regarding update on receivership case (0.2).	MJL	\$350.00	0.70	\$245.00
09/20/2023	Email regarding lender inquiry as to unit 131.	PFV	\$550.00	0.20	\$110.00
09/20/2023	Email regarding inclusion of spouses of deed holders in partition action.	PFV	\$550.00	0.20	\$110.00
09/20/2023	Email regarding Prestige demand.	PFV	\$550.00	0.20	\$110.00
09/20/2023	Call with counsel in the Thomas v. Prestige et al. case regarding insurance related matters.	PFV	\$550.00	0.50	\$275.00
09/20/2023	Review case law regarding multiple duties under management company relationship as it relates to coverage issues.	PFV	\$550.00	0.30	\$165.00
09/20/2023	Email with Receiver regarding Prestige coverage letter.	PFV	\$550.00	0.20	\$110.00
09/20/2023	Email with J. Mazer regarding Prestige coverage position.	PFV	\$550.00	0.20	\$110.00
09/20/2023	Telephone conference with Judge's chambers regarding entry of order granting fee application (.2 - no charge); work on services of summons to individual and corporate defendants (.2); update spreadsheet regarding parties to be added and dropped from amended complaint (.2).	rs	\$100.00	0.40	\$40.00
09/22/2023	Email communications with K. Shaw regarding correspondence from Prestige's insurer.	MJL	\$350.00	0.30	\$105.00
09/22/2023	Conference regarding access to property by unit owner.	PFV	\$550.00	0.30	\$165.00
09/22/2023	Email regarding Prestige liability policy.	PFV	\$550.00	0.20	\$110.00
09/22/2023	Email regarding Ms. Henderson access.	PFV	\$550.00	0.10	\$55.00
09/23/2023	Email communications with K. Shaw regarding tender of lawsuit letter sent by D. Brooks to her insurer, including analysis of documents provided by D. Brooks.	MJL	\$350.00	0.20	\$70.00
09/23/2023	Prepare email regarding remaining limits amount demand and potential impact on bad faith claim regarding Prestige cases.	PFV	\$550.00	0.40	\$220.00
09/23/2023	Email with M. Damian regarding Prestige coverage letter and related matters.	PFV	\$550.00	0.20	\$110.00
09/23/2023	Email regarding maintenance worker request to retrieve tools.	PFV	\$550.00	0.10	\$55.00
09/23/2023	Email with insurance coverage/bad faith claims counsel.	PFV	\$550.00	0.10	\$55.00
09/23/2023	Email regarding updated title search.	PFV	\$550.00	0.10	\$55.00
09/23/2023	Email regarding subpoenas to roofers regarding lien related information.	PFV	\$550.00	0.30	\$165.00
09/23/2023	Review email from real estate counsel regarding homestead property issues.	PFV	\$550.00	0.10	\$55.00
09/23/2023	Conference regarding Ms. Henderson access to unit.	PFV	\$550.00	0.20	\$110.00
09/23/2023	Managing resident access and recovery of possessions.	vs	\$120.00	9.00	\$1,080.00

09/24/2023	Email regarding bad faith lawyer retention and opinion regarding Prestige claims.	PFV	\$550.00	0.10	\$55.00
09/24/2023	Managing resident access and recovery of possessions.	vs	\$120.00	4.00	\$480.00
09/25/2023	Emails regarding demolition (.2); emails regarding insurance issues (.3).	MME	\$550.00	0.50	\$275.00
09/25/2023	Responding to email regarding resident complaint.	MME	\$550.00	0.40	\$220.00
09/25/2023	Review report regarding access of last remaining unit owner requesting access.	PFV	\$550.00	0.30	\$165.00
09/25/2023	Draft email to demolition company regarding status and planning.	PFV	\$550.00	0.30	\$165.00
09/25/2023	Emails to and from process server regarding status of services on defendants in partition action.	rs	\$100.00	0.20	\$20.00
09/26/2023	Analyze documents maintenance payments to determine unit owner for unit 108 in preparation of email communications with R. Zelman regarding ownership of such unit (0.1); analyze deeds for same unit in preparation of same (0.1); email communications with R. Zelman regarding same (0.1); work on notice of taking depositions of roofers (0.2); work on subpoena duces tecum to Elite Innovation Construction Inc. (0.2); work on subpoena duces tecum to Elrod Phillips, Jr. (0.1); work on subpoena duces tecum to D.J.T.H, LLC (0.2); work on subpoena duces tecum to Herby Myrtill (0.1); analyze email from DNY Holdings LLC in preparation of responding to same (0.1).	MJL	\$350.00	1.20	\$420.00
09/26/2023	Review email regarding title issues as to Unit 108.	PFV	\$550.00	0.10	\$55.00
09/27/2023	Analyze and fill out permit applications to be executed by the Receiver (0.2); analyze and fill out notice of commencement to be executed by the Receiver (0.1); email communications with L. Fitzpatrick regarding same (0.1); email communications with same regarding drone footage and photos (0.1).	MJL	\$350.00	0.50	\$175.00
09/27/2023	Reviewing and executing documents for demolition permit.	MME	\$550.00	0.30	\$165.00
09/27/2023	Review drone photos regarding demolition permit.	PFV	\$550.00	0.10	\$55.00
09/27/2023	Review demolition permit.	PFV	\$550.00	0.10	\$55.00
09/28/2023	Telephone call with R. Zelman regarding title commitment issues, homestead affidavits, and affidavits of non-marriage to be signed by unit owners (0.6); analyze asbestos report from Demolition Gods in preparation of communications with Receiver regarding same (0.1).	MJL	\$350.00	0.70	\$245.00
09/28/2023	Email with demolition company regarding arborist report and asbestos report.	PFV	\$550.00	0.40	\$220.00
09/28/2023	Email with first investigator regarding investigation evidence.	PFV	\$550.00	0.20	\$110.00
09/28/2023	Review email from R. Zelman regarding title issue.	PFV	\$550.00	0.10	\$55.00
09/28/2023	[No charge] Email to process server regarding service of summonses.	rs		0.30	\$0.00

09/29/2023	Email communications with R. Zelman regarding affidavits to be signed by the owners of unit 129 (0.1); work on joint demand letter to Prestige Management Solutions, Inc. with focus on revisions to same (0.1); work on amended notice of commencement to reflect Receiver's authority to act pursuant to court order and declaration of condominium, including analysis of declaration of condominium provision concerning repairs (0.5).	MJL	\$350.00	0.70	\$245.00
09/29/2023	Reviewing revisions to demand letter (.3); responding regarding same, strategy and insurance issues (.2); reviewing demolition reports and responding (.3).	MME	\$550.00	0.80	\$440.00
09/29/2023	Email regarding tree inventory report and possible removal of non-native species.	PFV	\$550.00	0.20	\$110.00
09/29/2023	Work on insurance coverage letter.	PFV	\$550.00	0.20	\$110.00
09/29/2023	Work on revisions to notice of commencement and permit documents.	PFV	\$550.00	0.80	\$440.00
09/29/2023	Email regarding Prestige policy limit demand.	PFV	\$550.00	0.30	\$165.00
09/29/2023	Email regarding Prestige coverage matters and conference regarding same.	PFV	\$550.00	0.30	\$165.00
10/02/2023	Work on permit application for demolition with focus on citations to declaration of condominium and order appointing receiver (0.3); work on permit application for plumbing with focus on same (0.2); email communications with L. Fitzpatrick regarding same (0.1).	MJL	\$350.00	0.60	\$210.00
10/03/2023	Work on amended complaint with focus on standing provision (0.3); email communications with unit owners regarding current mailing addresses (0.4); email communications with unit owners regarding marital status, including analysis of deeds which reference same regarding partition action (0.6).	MJL	\$350.00	1.30	\$455.00
10/03/2023	Email regarding request for account status.	PFV	\$550.00	0.10	\$55.00
10/03/2023	Email regarding update to Receiver regarding permit application documents.	PFV	\$550.00	0.10	\$55.00
10/04/2023	Email communications with the Receiver regarding amended notice of commencement and permit applications (0.1); work on list of respondents which have been served in the partition action, including affidavits of service regarding same (0.8); work on amended complaint with focus on revisions to addresses of respondents as set forth in affidavits of service (0.6); same with focus on revisions to addresses as set forth in responses to the complaint (0.7); work on list of respondents which have waived service of process in the partition action, including analysis of waivers of service (0.9); work on list of which respondents have not been served in preparation of effectuating service upon same (0.6).	MJL	\$350.00	3.70	\$1,295.00
10/05/2023	Email communications with D. Marin regarding service of process upon U. Ignorato, J. Gerarduzzi, B. Gerarduzzi, and J. St Germain, including analysis of Accurint reports as to each of the foregoing unit owners determine current addresses for same.	MJL	\$350.00	0.50	\$175.00

10/05/2023	Review summons regarding unit 136.	PFV	\$550.00	0.10	\$55.00
10/05/2023	Review email regarding service of process status.	PFV	\$550.00	0.10	\$55.00
10/05/2023	Email regarding Unit 102 request for financial information.	PFV	\$550.00	0.20	\$110.00
10/05/2023	Research on Sunbiz search of Rusol & Co Inc. (.1); draft summons in partition action regarding same (.2).	rs	\$100.00	0.30	\$30.00
10/06/2023	Email to Receiver regarding request to accept subpoena from counsel for renter class.	PFV	\$550.00	0.20	\$110.00
10/06/2023	Email to Receiver regarding proposed motion to lift stay.	PFV	\$550.00	0.20	\$110.00
10/06/2023	Call with J. Downs regarding status and potential resolution.	PFV	\$550.00	0.30	\$165.00
10/06/2023	Draft detailed status report regarding discovery subpoena in related case, Prestige claims, and proposed claims against the association.	PFV	\$550.00	0.50	\$275.00
10/06/2023	(No charge) Review court file and email to process server regarding service of additional summons on Rusol and Co Inc.	rs		0.20	\$0.00
10/08/2023	Analyze public records referenced in title search to determine which persons and entities should be added as respondents to partition action upon amendment to complaint (1.6); work on list of persons and entities to be served following amendment to foregoing complaint in preparation of effectuating service upon same (0.9).	MJL	\$350.00	2.50	\$875.00
10/09/2023	Email communications with D. Marin regarding affidavits of service of certain unit owners (0.1); analyze above-referenced affidavits in preparation of working on list of service (0.1); work on list of unit owners who still need to be served (0.6); work on list of interested parties to be served after amendment to complaint (0.4).	MJL	\$350.00	1.20	\$420.00
10/09/2023	Email with D. Robinson regarding third party subpoena to Receiver.	PFV	\$550.00	0.20	\$110.00
10/09/2023	Draft proposed protective order and email regarding same.	PFV	\$550.00	0.60	\$330.00
10/09/2023	Review email regarding amended complaint.	PFV	\$550.00	0.30	\$165.00

10/10/2023	Work on amended complaint with focus on adding all title exception persons and entities (0.1); email communications with D. Robinson regarding service of subpoena without deposition served upon the Receiver in the Thomas case (0.1); analyze subpoena without deposition served upon the Receiver in the Thomas case in preparation of responding and objecting to same (0.1); work on responses and objections to above-referenced subpoena (0.9); work on compiling documents to be produced in response to same (0.5); email communications with same regarding the proposed confidentiality order (0.1); analyze draft confidentiality order in preparation of working on revisions to same (0.2); analyze videos provided by L. Baptiste of fire (0.2); work on notice of taking depositions of roofers with focus on composite exhibit A to be attached thereto (0.2); email communications with the Receiver regarding same and subpoenas to be served upon roofers (0.1); email communications with D. Marin regarding service of subpoenas to roofers (0.1).	MJL	\$350.00	2.60	\$910.00
10/10/2023	Review file and conference regarding amended partition complaint and updated list of respondents.	PFV	\$550.00	1.10	\$605.00
10/11/2023	Analyze updated case law and statutes regarding service by publication to determine whether the Receiver may serve the partition complaint upon certain yet to be served unit owners by publication (0.6); email communications with R. Zelman regarding same (0.1); email communications with J. Gerarduzzi regarding last known address and waiver of service of summons (0.2); email communications with K. Stantz regarding waiver of service of summons for J. Leguerre (0.1); email communications with J. Zaga regarding updated waiver of service of summons due to revised power of attorney (0.2); work on updated list of unit owners who have been served process or still need to be served (0.3); work on amended complaint with focus on section regarding parties, venue, and jurisdiction (0.3); same with focus on list of unit owners to be attached thereto (0.4); same with focus on list of lienholders to be attached thereto (0.3); work on motion for extension of time to effectuate service of process upon respondents in partition action (0.4); telephone call with R. Zelman regarding marital settlement agreements referenced in the title search and further information regarding same (0.2).	MJL	\$350.00	3.10	\$1,085.00
10/11/2023	Email regarding unit owner regarding unit 103 and service of process, demolition of buildings and update as to plans partition and call with M. Levine.	PFV	\$550.00	0.30	\$165.00
10/11/2023	Review updated service of process summary sheet.	PFV	\$550.00	0.20	\$110.00
10/11/2023	Email with lead counsel in Thomas case regarding proposed confidentiality order regarding production of Prestige file.	PFV	\$550.00	0.10	\$55.00
10/11/2023	Review email regarding Leguarre service of process.	PFV	\$550.00	0.10	\$55.00
10/11/2023	Review email regarding service by publication of partition action.	PFV	\$550.00	0.10	\$55.00

10/11/2023	Draft response and follow up questions regarding same as to means and methods and satisfaction of title insurance requirements.	PFV	\$550.00	0.30	\$165.00
10/11/2023	Email regarding waiver regarding Zaga and related power of attorney.	PFV	\$550.00	0.10	\$55.00
10/11/2023	Email to opposing counsel in Thomas case regarding confidentiality order in response to subpoena.	PFV	\$550.00	0.20	\$110.00
10/11/2023	Review, analyze and update spreadsheet regarding service to all defendants and executed corporate waivers.	rs	\$100.00	0.50	\$50.00
10/12/2023	Analyze updated case law and statutes regarding sworn statements necessary for service by publication as to individual defendant and compare same with requirements as to corporation defendant in preparation of service by publication (0.3); work on memorandum regarding marital settlement agreements and information needed to be obtained from certain unit owners to clear title (0.4).	MJL	\$350.00	0.70	\$245.00
10/13/2023	Review email regarding title research matters.	PFV	\$550.00	0.20	\$110.00
10/13/2023	Draft email to Melbourne Lawson regarding unit 104 on title search in partition action.	rs	\$100.00	0.20	\$20.00
10/15/2023	Review and conduct preliminary analysis of motion to lift stay.	PFV	\$550.00	0.40	\$220.00
10/15/2023	Email receiver regarding status.	PFV	\$550.00	0.10	\$55.00
10/15/2023	Email with coverage counsel regarding coverage issues regarding motion to lift stay.	PFV	\$550.00	0.10	\$55.00
10/15/2023	Review Forty Year answer to partition complaint.	PFV	\$550.00	0.20	\$110.00
10/16/2023	Email communications with D. Marin regarding service of subpoenas duces tecum upon E. Phillips and Elite Innovation Construction Inc. (0.1); analyze motion to lift stay in preparation of working on response to same (0.3).	MJL	\$350.00	0.40	\$140.00
10/17/2023	Email communications with R. Zelman regarding communications with unit owners concerning marital settlement agreements and related matters.	MJL	\$350.00	0.10	\$35.00
10/17/2023	Email regarding demolition update.	PFV	\$550.00	0.10	\$55.00
10/17/2023	Conference regarding request for return of tools by maintenance worker.	PFV	\$550.00	0.10	\$55.00
10/17/2023	Email to counsel for Prestige regarding request to verify claim.	PFV	\$550.00	0.10	\$55.00
10/17/2023	Review motion to extend time to service process (.1); and draft email regarding same (.1).	PFV	\$550.00	0.20	\$110.00
10/17/2023	Email regarding video of fire.	PFV	\$550.00	0.30	\$165.00
10/18/2023	Review email regarding title issues regarding unit 138.	PFV	\$550.00	0.10	\$55.00
10/18/2023	Review email regarding unit number information on summons.	PFV	\$550.00	0.10	\$55.00
10/18/2023	Work on response to subpoena to Receiver from Thomas Plaintiffs in Thomas case.	PFV	\$550.00	0.20	\$110.00
10/18/2023	Work on response to subpoena in Thomas case.	PFV	\$550.00	0.40	\$220.00
10/18/2023	Review files regarding video of fire.	PFV	\$550.00	0.30	\$165.00

10/18/2023	Review notes regarding interview with witness regarding fire.	PFV	\$550.00	0.10	\$55.00
10/18/2023	Call with Jason Mazer regarding insurance coverage matters.	PFV	\$550.00	0.70	\$385.00
10/18/2023	Email with adjuster requesting coverage position as to Thomas Plaintiffs' motion to lift stay.	PFV	\$550.00	0.20	\$110.00
10/18/2023	Telephone call with D. Marin regarding skip traces on unit owners which cannot be located for service of process (0.1); work on responses to subpoena duces tecum served upon the association in the Thomas case (0.9); work on notice of taking depositions duces tecum of roofers (0.1); email communications with D. Marin regarding affidavit of service of E. Small (0.1); email communications with the Receiver regarding videos of fire provided by L. Baptiste (0.1); analyze video footage provided to Receiver in preparation of producing documents responsive to the foregoing subpoena (0.2); analyze Miami-Dade County Fire Department's fire report and photographs referenced in same in preparation of same (0.2); analyze email communications with unit owners and tenants to determine whether such communications or attachments thereto are responsive to the foregoing subpoena in preparation of same (0.7); analyze email communications with agents and representatives of the City of Miami Gardens to determine same in preparation of same (0.3); analyze email communications with Receiver and team to determine same in preparation of same (0.3).	MJL	\$350.00	3.00	\$1,050.00
10/19/2023	Email communications with R. Zelman regarding communications with owner of Unit 138 concerning marital status and marital settlement agreement (0.1); analyze non-party's motion to partially lift stay in preparation of working on response in opposition to same (0.6); analyze case law cited in same in preparation of same (0.7); work on outline of response to same in preparation of same (0.2).	MJL	\$350.00	1.60	\$560.00
10/19/2023	Conference with Hiscox insurer.	PFV	\$550.00	0.10	\$55.00
10/19/2023	Review land survey regarding demolition.	PFV	\$550.00	0.20	\$110.00
10/19/2023	Receipt and review of email from process server regarding status of service of summonses on defendants (.2); update spreadsheet regarding same (.3); search of corporate defendants that did not execute waiver on Sunbiz (.2); draft summonses for same in partition action (.3).	rs	\$100.00	1.00	\$100.00
10/20/2023	Conference with coverage attorney regarding Prestige matters and renewed Thomas claim.	PFV	\$550.00	0.50	\$275.00
10/20/2023	Work on response to subpoena from Plaintiffs in Thomas case.	PFV	\$550.00	0.40	\$220.00
10/20/2023	Review Duestche Bans v. Shorn King complaint and New World et al Complaint (.3); and conference with M. Levine regarding status and planning as to response to that matter (.3).	PFV	\$550.00	0.60	\$330.00

10/20/2023	Email communications with J. Downs regarding communications with E. Cooper concerning his former employment and maintenance equipment (0.1); telephone call with B. Scott regarding employment of E. Cooper, maintenance equipment, and taxes (0.3); email communications with the Receiver regarding same (0.2); email communications with same regarding 2024 property taxes (0.1); email communications with R. Zelman regarding homestead for spouses of unit owners (0.1); work on amended complaint with focus on same (0.1); work on response to subpoena without deposition served upon Receiver in Thomas case (0.4); work on Receiver's third report with focus on updates regarding demolition (0.4); same with focus on unit owner meetings (0.6); same with focus on litigation brought by the Receiver (0.6); same with focus on litigation against the Association (0.7).	MJL	\$350.00	3.60	\$1,260.00
10/20/2023	(No charge) Review court file for issuance of corporate summonses (.2); email to process server regarding service of same in partition action (.2).	rs		0.40	\$0.00
10/21/2023	Analyze non-party tenants' motion to partially lift stay in preparation of working on response in opposition to same (0.6); analyze case law cited in same in preparation of same (0.7); analyze updated case law regarding stay of litigation in receivership cases in preparation of same (1.1); work on outline of foregoing response in preparation of same (0.4).	MJL	\$350.00	2.80	\$980.00
10/22/2023	Review email regarding unit owner inquiry as to Dade County tax assessment and draft response.	PFV	\$550.00	0.20	\$110.00
10/22/2023	Email regarding claims of Mr. Cooper of maintenance equipment and tools.	PFV	\$550.00	0.20	\$110.00
10/23/2023	Email communications with D. Marin regarding service of process upon respondents which have not been served (0.1); communications with Receiver regarding Deutsche Bank case (0.7); communications with E. Cooper regarding ownership of tools at property (0.1); work on notice of appearance to be filed in Deutsche Bank case (0.2); work on motion to transfer to be filed in same (0.3); email communications with D. Marin regarding service of process upon J. Lewis, including analysis of affidavit of service regarding same (0.1); work on Receiver's third report and fee application with focus on citations to court filings (0.6); same with focus on Deutsche Bank litigation (0.4); same with focus on dismissal of Forty Year Investment action (0.4); same with focus on Thomas action, including analysis of recent court filings (0.7); same with focus on fee application (0.6); same with focus on proposed order granting same to be attached to same (0.3); analyze questions submitted by unit owners via email in preparation of meeting with unit owners regarding updates on the receivership (0.2); attend zoom meeting to update unit owners and interested parties on receivership and related matters (0.7).	MJL	\$350.00	5.40	\$1,890.00
10/23/2023	Email regarding hearing on motion to extend time to serve complaint.	PFV	\$550.00	0.20	\$110.00
10/23/2023	Prepare for Zoom conference with New World ownership.	PFV	\$550.00	0.30	\$165.00

10/23/2023	Attend Zoom for New World ownership.	PFV	\$550.00	0.80	\$440.00
10/23/2023	Review and revised status report to the court.	PFV	\$550.00	0.40	\$220.00
10/24/2023	Work on memorandum regarding updates on service upon respondents in partition action, including analysis of updated service list and analysis of email communications with D. Marin regarding service (0.7); work on list of who must be served following amendment to complaint (0.3); work on memorandum regarding service by publication, including analysis of updated statutes and case law regarding same (0.8).	MJL	\$350.00	1.80	\$630.00
10/24/2023	Telephone call regarding potential claims against manager.	MME	\$550.00	0.30	\$165.00
10/24/2023	Prepare revised email to unit owner regarding unit 102 requesting income and expense information regarding the Receivership estate.	PFV	\$550.00	0.20	\$110.00
10/24/2023	Review unserved unit owner list and status report regarding service of process.	PFV	\$550.00	0.20	\$110.00
10/24/2023	Review research regarding service of process by publication.	PFV	\$550.00	0.20	\$110.00
10/24/2023	Conferences with M. Levine and M. Damian regarding analysis of grounds for opposition to motion to lift stay filed by the Thomas Plaintiffs.	PFV	\$550.00	0.60	\$330.00
10/25/2023	Email communications with D. Marin regarding skip trace on U. Ignorato (0.1); analyze condominium documents to determine whether the Association is required or permitted to specially assess unit owners after termination in preparation of working on response to motion to partially lift stay (1.2); analyze 1996 version of the condominium act to determine same in preparation of same (0.9); analyze same to determine which equitable remedies exist (0.6); work on outline of response in opposition to non-party motion to partially lift stay of litigation (0.4).	MJL	\$350.00	3.20	\$1,120.00
10/25/2023	Review condominium documents and relevant condominium statutes regarding rights and obligations of association and members regarding third party claims and analysis of factors applicable to opposition to motion to lift stay and work on formulation of arguments in opposition to motion to lift stay.	PFV	\$550.00	1.70	\$935.00
10/25/2023	Review Baptiste complaint regarding grounds for relief regarding receiver's role a powers as to third party complaints and payment of obligations.	PFV	\$550.00	0.30	\$165.00
10/25/2023	Review email regarding additional summonses.	PFV	\$550.00	0.10	\$55.00
10/25/2023	Review court file for issuance of corporate summonses on lienholders/mortgagors (.2); email to process server regarding service of same in partition action (.2).	rs	\$100.00	0.40	\$40.00
10/25/2023	Email from unit owner regarding information requested as to court notice.	PFV	\$550.00	0.10	\$55.00
10/25/2023	Review affidavit of service upon Valtcom.	PFV	\$550.00	0.10	\$55.00

10/26/2023	Analyze non-party motion to partially lift stay of litigation and updated case law regarding same in preparation of working on Receiver's response in opposition to same (0.9); work on foregoing response with focus on factual background regarding non-parties violation of the stay provision (0.6); same with focus on argument that non-parties will not suffer substantial injury if stay is not lifted (0.7); same with focus on argument that non-parties' motion is premature (0.8); same with focus on argument that non-parties' underlying claims lack merit (0.9); same with focus on argument that requested relief will diminish receivership assets (0.6); work on Receiver's third report with focus on updates regarding same (0.4).	MJL	\$350.00	4.10	\$1,435.00
10/26/2023	Email with opposing counsel regarding hearing on motion to lift stay.	PFV	\$550.00	0.20	\$110.00
10/27/2023	Work on waiver of service for Valtom LLC in preparation of communications with K. Latorre regarding same (0.1); email communications with K. Latorre regarding foregoing waiver of service (0.1); telephone call with R. Zelman regarding service by publication (0.2).	MJL	\$350.00	0.40	\$140.00
10/27/2023	Conference with M. Levine regarding title issues as to service of process by publication.	PFV	\$550.00	0.40	\$220.00
10/27/2023	Email regarding A. Henderson request for late access.	PFV	\$550.00	0.10	\$55.00
10/27/2023	Email regarding service of partition complaint.	PFV	\$550.00	0.10	\$55.00
10/29/2023	Prepare status report to the Receiver regarding response to the motion to lift stay filed by the Thomas Plaintiffs and certain insurance matters regarding the Prestige claims and Association General Liability policy.	PFV	\$550.00	0.60	\$330.00
10/30/2023	Email communications with B. Levenson regarding response to motion to partially lift stay of litigation (0.2); attend in-person meeting with Z. Anderson regarding power of attorney, affidavits regarding same, and waiver of service for process for partition action (0.9); telephone call with R. Zelman regarding additional respondents to be added to the amended complaint pursuant to the title search (0.5); work on memorandum to R. Zelman regarding title search items addressed during above-referenced telephone call with focus on Miami-Dade County Code Enforcement Liens, including analysis of same (0.7); same with focus on roofer's notice of commencement, including analysis of same (0.3); same with focus on assignment of mortgage for unit 105, including analysis of same (0.4); same with focus affidavit referenced in title search item no. 27 (0.2); same with focus on judgments against former owner of unit 106 (0.6); same with focus on mortgage for unit 107 (0.2); same with focus on mortgage for unit 108 (0.2); same with focus on mortgage for unit 110 (0.1); same with focus on final judgments against former unit owner of same unit, including analysis of such judgments (0.3); same with focus on mortgage for unit 111 and affidavit of continuous marriage for unit owners (0.3).	MJL	\$350.00	4.90	\$1,715.00
10/30/2023	Review motion to lift stay of litigation, original complaint and motion to appoint receiver, order appointing receiver and staying litigation, and class action complaint.	RKL	\$525.00	0.50	\$262.50

10/30/2023	Review email regarding response to demand to Prestige and draft response.	PFV	\$550.00	0.10	\$55.00
10/30/2023	Conference with M. Levine regarding amendments to compliant regarding title issues.	PFV	\$550.00	0.20	\$110.00
10/30/2023	Email regarding response to motion to lift stay.	PFV	\$550.00	0.20	\$110.00
10/31/2023	Work on amended complaint for partition with focus on revisions to list of mortgagees based upon mortgages referenced in title search (1.2); email communications with B. Levenson regarding response to motion to partially lift stay of litigation (0.2); telephone call with R. Zelman regarding title search and amendments to complaint (0.8); work on list of lienholders and creditors to be attached to the amended complaint based upon documents cited in title search, including analysis of such documents (0.9); email communications with R. Zelman regarding final judgments referenced in title search concerning unit 134 (0.3).	MJL	\$350.00	3.40	\$1,190.00
				293.60	\$104,772.50

Costs & Expenses

Date	Description	Amount
07/11/2023	Miami Dade Circuit Court. Filing Complaint David M. Gersten v. Prestige Management Solutions. 07.11.23	\$415.04
07/13/2023	Postage	\$0.63
07/25/2023	Postage	\$0.63
07/26/2023	Postage	\$1.26
07/31/2023	Photocopies	\$11.16
08/01/2023	Postage	\$2.52
08/07/2023	Postage	\$0.87
08/29/2023	Postage	\$0.63
08/31/2023	Photocopies	\$37.62
08/31/2023	Accurant Research Fee	\$788.86
08/31/2023	Pacer/ Court Documents	\$6.50
08/31/2023	Lexis Nexis Advance Legal Research Fee	\$1.45
09/01/2023	OTR Legal Process. Invoice 2023001047. Summons to be served on Anpix LLC c/o Registered Agent, Pixan Property Management LLC. additional copies. 09.01.23	\$62.00
09/13/2023	OTR Legal Process. Invoice 2023001041. Summons to be served on Larbol Property, LLC c/o Registered Agent RCG Accounting & Associates. additional copies. 09.13.23	\$62.00
09/13/2023	OTR Legal Process. Invoice 2023001042. Summons to be served on D.N.Y. Holdings, LLC c/o Registered Agent Jonathan Daniel. additional copies. 9.13.23	\$62.00
09/14/2023	OTR Legal Process. Invoice 2023001040. Summons to be served on Cardinal Andrews. additional copies. 09.14.23	\$62.00
09/18/2023	Postage	\$12.18
09/19/2023	OTR Legal Process. Invoice 2023001039. Summons to be served on Kipchoge A. Forrest. additional copies. 09.19.23	\$62.00
09/20/2023	Research Fee	\$11.43
09/20/2023	FEDEX. Invoice 57155. Keith D. Diamond, P.A. 09.20.23	\$19.73

09/20/2023	Postage	\$1.26
09/20/2023	OTR Legal Process. Invoice 2023001038. Summons to be served on Suielal Beepot. additional copies 9.20.23	\$62.00
09/21/2023	OTR Legal Process. Invoice 2023001046. Summons to be served on Selwyn Nisbett. additional copies, additional Addresses. 09.21.23	\$117.00
09/25/2023	OTR Legal Process. Invoice 2023001037. Summons to be served on Liliam Acosta, Copies, Additional Addresses. 09.25.23	\$117.00
09/25/2023	OTR Legal Process. Invoice 2023001066. Summons to be served on Edward Small, Additional attempts No Contact made, copies. 9.25.23	\$197.00
09/30/2023	Accurint Research Fee	\$44.36
09/30/2023	Lexis Nexis Advance Legal Research Fee	\$25.01
09/30/2023	Photocopies	\$44.28
09/30/2023	Webmaster. Post meeting notices to home and important dates pages. Hosting Renewal for August, September and October. 9.30.23	\$107.10
10/02/2023	OTR Legal Process. Invoice 2023001043. Summons to be served on Veronica Lucia Garzon. additional copies. 10.02.23	\$62.00
10/03/2023	OTR Legal Process. Invoice 2023001044. Summons to be served on Zilphia L. Anderson. additional copies. 10.03.23	\$62.00
10/03/2023	OTR Legal Process. Invoice 2023001045. Summons to be served on Eight is Enough LLC c/o Registered Agent, Alicia Hayes. additional copies. 10.03.23	\$62.00
10/05/2023	Partition Action - Summons to be issued in Miami Dade. 10.05.23	\$15.00
10/09/2023	Postage	\$0.63
10/14/2023	OTR Legal Process. Invoice 2023001067. Subpoena to be served on Herby Myrtil. 10.14.23	\$55.00
10/14/2023	OTR Legal Process. Invoice 2023001068. Subpoena to be served on D.J.T.H. LLC, c/o Herby Myrtil, Registered Agent. 10.14.23	\$55.00
10/17/2023	OTR Legal Process. Invoice 2023001071. Summons to be served on Jose A Gerarduzzi. Copies, Non Served. 10.17.23	\$62.00
10/17/2023	OTR Legal Process. Invoice 2023001072. Summons to be served on Barbara Gerarduzzi. Copies, Non-Serve. 10.17.23	\$62.00
10/19/2023	OTR Legal Process. Invoice 202301074. Summons to be served on James Lewis, Copies, Additional Attempts. 10.19.23	\$117.00
10/19/2023	Partition Action - Four Corporate Summons submitted to clerk. 10.19.23	\$45.00
10/24/2023	Partition Action - Two Corporate Summons. 10.24.23	\$25.00
10/24/2023	OTR Legal Process. Invoice 2023001075. Dade Summons to be served on Valtom LLC c/o Registered Agent Raul Alberto Raggio. Copies. 10.24.23	\$62.00
10/24/2023	OTR Legal Process. Invoice 2023001076. Dade Summons to be served on Lupeana, Corp c/o Registered Agent MLP Financial Group Inc. 10.24.23	\$62.00
10/24/2023	OTR Legal Process. Invoice 2023001077. Dade Summons to be served on Feel Miami Beach, Corp c/o Registered Agent MLP Financial Group Inc. 10.24.23	\$62.00
10/24/2023	Postage	\$8.82
10/25/2023	Postage	\$1.26
10/26/2023	OTR Legal Process. Invoice 2023001078 Subpoena to be served on Elrod Phillips Jr. Additional Address. 10.26.23	\$110.00
10/26/2023	OTR Legal Process. Invoice 2023001079. Subpoena to be served on Corporate Representative Elite Innovation Construction Inc c/o Elrod Phillips. 10.26.23	\$110.00

10/27/2023	OTR Legal Process. invoice 2023001080. Summons to be served on Home Financing Center Inc. c/o Registered Agent, Claudine Claus, Copies 10.27.23	\$62.00
10/31/2023	Accurint Research Fee	\$198.71
10/31/2023	Lexis Nexis Advance Legal Research Fee	\$30.63
10/31/2023	Photocopies	\$100.98
		\$3,766.55

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Peter Valori	PFV	85.4	\$550.00	\$46,860.00
Morgan Levine	MJL	108.4	\$350.00	\$37,800.00
Reesea Saetae	rs	14.2	\$100.00	\$1,210.00
Melanie Damian	MME	17.0	\$550.00	\$9,350.00
Daniel Jellema	dj	52.5	\$120.00	\$6,300.00
Russell Landy	RML	0.3	\$550.00	\$165.00
Thomas Culmo	TAC	2.3	\$550.00	\$1,265.00
Vladimir Suarez	vs	13.0	\$120.00	\$1,560.00
RKL	RKL	0.5	\$525.00	\$262.50

Invoice Amount: \$108,539.05

Amount Applied: \$0.00

Balance Due: \$108,539.05



CLICK TO PAY

Visit: <https://rapidpay.us>
Ref: **220141068944**

Payments Since Last Invoice

Date	Description	Amount
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Composite Exhibit 2

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

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

August 25, 2023
Invoice Number 113042

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

PROFESSIONAL SERVICES

		Hours
08/09/23	RMZ Telephone call with Dominique Brown, Esq. regarding County liens; telephone conference with Peter Valori, Esq. regarding homestead issues and service of process; prepare email to David Gersten, Esq; review title commitment; telephone call with Attorneys Title Fund.	1.30
08/10/23	RMZ Preparation of correspondence to Natalie Zagury, Esq. regarding Unit 29; review title matters; telephone call with Herbert Touzalin regarding Units 125-126.	0.80
08/11/23	RMZ Telephone call with Deb Ulman of the Fund regarding Unit 162 and Non-ID Affidavit; correspondence to Deb Ulman; correspondence to Peter Valori, Esq; prepare correspondence to Vollrick Wallace.	0.80

August 25, 2023

Page 2

Invoice 113042

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

08/14/23	RMZ	Preparation of correspondence to Natalie Zagury, Esq. regarding Non-Homestead Affidavit re Unit 105.	0.30	
08/15/23	RMZ	Review correspondence from Natalie Zagury, Esq; telephone call with Iris Castillo; draft and preparation of scrivener's and marital status affidavit.	0.60	
08/23/23	IC	Review Mortgages requiring Satisfactions; search contact information.	3.75	
08/25/23	RMZ	Telephone call with Iris Castillo; review "Brown" Affidavit; review title search update.	0.50	
		TOTAL HOURS AND FEES	8.05	2,597.25
		TOTAL STATEMENT		2,597.25

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	4.30	2,128.50
Iris Castillo	3.75	468.75
Total Fees	8.05	2,597.25

07/25/23	PREVIOUS BALANCE	14,407.00
	TOTAL STATEMENT	2,597.25
	<u>NEW BALANCE</u>	<u>17,004.25</u>

Accounts Receivable Aging

Current	2,597.25
30 Days	3,184.00
60 Days	11,223.00
90 Days	0.00

August 25, 2023

Page 3

Invoice 113042

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

120 Days

0.00

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ID#: 65-0212052

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

September 25, 2023
Invoice Number 113061

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

PROFESSIONAL SERVICES

			Hours
08/28/23	IC	Research concerning open mortgages for purposes of obtaining mortgage payoff letters.	4.50
09/10/23	RMZ	Review and revise Affidavit for Natalie Zagury, Esq; review correspondence from Natalie Zagury, Esq.	0.20
09/13/23	RMZ	Review documents from Morgan Levine, Esq. and correspondence to Morgan Levine.	0.70
09/14/23	RMZ	Review correspondence from Morgan Levine, Esq; review title matters; prepare correspondence to Morgan Levine, Esq.	0.70
09/15/23	RMZ	Review correspondence from Peter Valori, Esq; telephone call with Dominique Brown, Esq.	0.20

September 25, 2023

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Invoice 113061

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

09/15/23	RMZ	Review correspondence from Peter Valori, Esq; David Gersten, Esq, et al; prepare correspondence to David Gersten, Esq. and Peter Valori, Esq; telephone call with Dominique Brown, Esq.	0.40	
09/18/23	RMZ	Telephone call with Dominique Brown, Esq. regarding Condominium Association assessments; review statute.	0.30	
09/19/23	RMZ	Review statute; correspondence to David Gersten, Esq. and Peter Valori, Esq.	0.20	
09/20/23	RMZ	Review correspondence from Peter Valori, Esq; review correspondence from Morgan Levine, Esq.	0.40	

TOTAL HOURS AND FEES	7.60	2,097.00
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TOTAL STATEMENT		2,097.00
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<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	3.10	1,534.50
Iris Castillo	4.50	562.50
Total Fees	7.60	2,097.00

08/25/23	PREVIOUS BALANCE	17,004.25
09/27/23	PAYMENT -THANK YOU-	-14,407.00
	TOTAL STATEMENT	2,097.00
	<u>NEW BALANCE</u>	<u>4,694.25</u>

September 25, 2023

Page 3

Invoice 113061

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

Accounts Receivable Aging

Current	2,097.00
30 Days	2,597.25
60 Days	0.00
90 Days	0.00
120 Days	0.00

Sacher Zelman Hartman, P.A.
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ID#: 65-0212052

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

October 25, 2023
Invoice Number 113077

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

PROFESSIONAL SERVICES

Hours

09/28/23	RMZ	Telephone call with Iris Castillo; telephone call with Morgan Levine regarding Units 101, 108, 218, 219 and related title requirements; review requirement Nos. 120-128; prepare Affidavit for Ziphilia; review Power of Attorney.	1.90
10/04/23	RMZ	Review correspondence from Morgan Levine.	0.20
10/11/23	RMZ	Preparation of correspondence to Morgan Levine, Esq; review Power of Attorney.	0.30
10/12/23	RMZ	Telephone call with Morgan Levine, Esq; review title regarding Unit 229; review mortgage unit 139 and related correspondence to the Fund; conference with Iris Castillo regarding marital settlement agreements for Units 104, 129 and 138.	1.30

October 25, 2023

Page 2

Invoice 113077

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

10/17/23	RMZ	Review correspondence from Morgan Levine.	0.20	
10/18/23	RMZ	Telephone call with Iris Castillo regarding source of funds proof; review correspondence from Morgan Levine.	0.20	
10/19/23	RMZ	Telephone call with Iris Castillo regarding marital settlement agreements; correspondence to the Fund regarding mortgage payoff proof of funds.	0.20	
10/24/23	RMZ	Review correspondence from Morgan Levine, Esq. regarding service of process.	0.20	
10/25/23	RMZ	Preparation of Memo to D. Ullman of the Fund; telephone call with D. Ullman regarding title requirements; review correspondence from D. Ullman.	0.50	
TOTAL HOURS AND FEES			5.00	2,475.00
DISBURSEMENTS				
09/29/23				29.10
TOTAL COST				29.10
TOTAL STATEMENT				2,504.10

October 25, 2023

Invoice 113077

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

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	5.00	2,475.00
Total Fees	5.00	2,475.00

09/25/23	PREVIOUS BALANCE	19,101.25
09/27/23	PAYMENT -THANK YOU-	-14,407.00
	TOTAL STATEMENT	2,504.10
	<u>NEW BALANCE</u>	<u>7,198.35</u>

Accounts Receivable Aging

Current	2,504.10
30 Days	2,097.00
60 Days	2,597.25
90 Days	0.00
120 Days	0.00

Exhibit 3

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

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

CASE NO. 2023-001716-CA-01

SECTION: CA-11

Plaintiffs,

v.

NEW WORLD CONDOMINIUM
APARTMENTS CONDOMINIUM
ASSOCIATION, INC.,

Defendant.

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

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

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

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

in the total amount of \$34,723.00 and costs in the total amount of \$42.47, for a total of \$34,765.47 (after being reduced as set forth in the Application) for the period from July 1, 2023 through October 31, 2023;

(b) Damian | Valori | Culmo, as Lead Counsel to the Receiver incurred fees in the amount of \$104,772.50 and costs in the amount of \$3,766.55, for a total of \$108,539.05 (after being reduced as set forth in the Application) for the period from July 1, 2023 through October 31, 2023; and

(c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver: Fees in the amount of \$7,169.25 and costs in the amount of \$29.10, for a total of \$7,198.35 (after being reduced as set forth in the Application) for the period from August 1, 2023 through October 31, 2023.

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 November, 2023.

CIRCUIT COURT JUDGE

Copies to all Counsel of Record