

IN THE CIRCUIT COURT FOR THE 11<sup>TH</sup>  
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.

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**RECEIVER'S SIXTH 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 sixth report regarding the above-referenced matter, along with his request for authorization of interim professional fees and expenses.

**I. Summary of the Receiver's Activities.**

**A. Employment of Professionals.**

The Receiver continues to engage the following professionals referenced in his Preliminary Report [D.E. 23], Second Report [D.E. 29], Third Report [D.E. 40], Fourth Report [D.E. 49], and Fifth Report [D.E. 51] 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 for the reasons set forth in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], as well as their continued assistance in evaluating the Association’s rights and obligations, investigating and pursuing the Association’s claims, defending claims against the Association, operating the Association on an interim basis, determining the estimated and/or potential value of the Receivership Estate (*i.e.*, matters impacted by the value of the condominium property), communicating with the unit owners/residents of the Association, adjusters, creditors, and others with interest in the property, and providing such persons with necessary information regarding the subject receivership.

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

The Receiver had all funds of the Association transferred to Lead Counsel’s fiduciary account from the bank at which the Association had an account at the time the Order Appointing Receiver [D.E. 10] was entered. The Receiver has also collected some regular maintenance payments from the Association membership. The Receiver attaches a current financial accounting report as of August 12, 2024, attached hereto as **Exhibit 1** (Standard Fund Accounting Report).

The Court approved the payment of certain creditors of the Association and some fees of professionals on April 24, 2023 [D.E. 24], September 19, 2023 [D.E. 35], December 7, 2023 [D.E. 42], February 26, 2024 [D.E. 50], and May 29, 2024 [D.E. 52]. The Court also approved two loan certificates in the amount of four-hundred-thousand dollars (\$400,000) for payment to certain creditors and professionals on March 28, 2023 [D.E. 21], and in the amount of five-hundred-thousand dollars (\$500,000) for the demolition of the structurally damaged building on the

condominium property and payment of other receivership expenses on August 17, 2023 [D.E. 31]. Damian | Valori | Culmo used its law firm line of credit to loan the Association \$111,000 at the rate that the Firm pays on its line for Association expenses.

### **C. The Association's Business Operations.**

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

The Receiver and his professionals continue to maintain unit owner and resident relations by updating the receivership website (<https://newworldcondoreceivership.com/>), and communicating with unit owners and residents and other interested parties via e-mail ([newworldreceivership@gmail.com](mailto:newworldreceivership@gmail.com)) and the direct phone line for the receivership (786-854-7523). Since the Receiver filed his Fourth Report [D.E. 49], the Receiver, through Lead Counsel, notified the unit owners and other interested parties of updates concerning the partition action referenced *infra*, and communicated with unit owners and others interested, along with Special Counsel, regarding several title related matters in preparation of the anticipated sale of the condominium property, among other things. Lead Counsel continues to field calls and emails from residents and unit owners each week, answering questions or providing requested information or both. The Receiver and Lead Counsel have also held thirteen Zoom Meetings to date for the purpose of keeping unit owners abreast of significant developments and to answer questions. The

most recent Zoom Meeting was held on April 30, 2024. The next Zoom unit owner meeting is scheduled for August 28, 2024.

**D. Retrieval of Belongings.**

As set forth in the Receiver's prior reports [D.E. 23, 29, 40, 49, 51], 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.<sup>1</sup>

**E. Written Notice Required for Repairs.**

As referenced in the Receiver's prior reports [D.E. 23, 29, 40, 49, 51], the Receiver and Lead Counsel did not receive written notice to repair the condominium property from 70% of unit owners as required by section 12.8(b)(ii) of the Declaration of Condominium (Book 17301, Page 1661), and therefore, the Association is to dissolve pursuant to its Declaration of Condominium. The Receiver, through Lead Counsel, filed claims for declaratory judgment as to the dissolution and for partition of the condominium property as referenced *infra*.

**F. Demolition.**

As set forth in the Receiver's Third Report [D.E. 40], the Receiver, through Lead Counsel, moved the Court to allow the Receiver to demolish the structurally damaged building on the condominium property and enter into an agreement to borrow the funds needed for such demolition on August 16, 2023 [D.E. 30]. The Court approved the demolition and related loan certificate, and

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<sup>1</sup> 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.

authorized the Receiver to enter into negotiations with the bidders, and a contract, to demolish the buildings based on cost and other variables to obtain the best quality and value for the owners on August 17, 2023 [D.E. 31]. And, on September 13, 2023, the Receiver, through Lead Counsel, notified the unit owners and others interested in the condominium property of the Court-approved demolition via email and a Notice of Demolition filed in the above-captioned action [D.E. 32]. Such notice also provided that Demolition Gods LLC was contracted to perform the demolition.

In preparation of the permitting process and demolition, Demolition Gods LLC took drone footage and photographs of the condominium property, obtained an asbestos report, and obtained a survey of the property. And, the Receiver, through Lead Counsel, executed a notice of commencement for the demolition and related permit applications.<sup>2</sup> The related permit applications were submitted to the Building Official for the City of Miami Gardens on or about October 2, 2023. The Building Official for the City of Miami Gardens issued and approved the master demolition permit on or about January 26, 2024, and issued and approved the sub-permit for plumbing on or about February 1, 2024.

The demolition commenced on March 20, 2024 and was completed on May 23, 2024. The property is currently being maintained as a vacant lot, which will be available upon approval in the partition action for sale.

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

**G. Legal Proceedings Filed Against, *Inter Alia*, the Association.<sup>3</sup>**

**i. Eliteway Class Action (f/k/a Whitfield Class Action).<sup>4</sup>**

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], the Association is no longer a party to the class action lawsuit initially filed by one of the unit owner’s tenants, Shekita Whitfield, against the Association and its former property management company and former board members on March 3, 2023. See *Whitfield, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-003137-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Whitfield Class Action”).

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

Since the filing of the Receiver’s Fifth Report [D.E. 51], the Receiver, through Lead Counsel, monitors the Eliteway Class Action as needed.

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<sup>3</sup> 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].

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

**ii. Thomas Class Action.**

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], certain tenants of certain unit owners filed a lawsuit against the Association and its former property management company on July 11, 2023. *See Thomas, et al. v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-019490-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Thomas Class Action”). After initially including the Association as a defendant in that case, the plaintiffs amended their complaint to, *inter alia*, drop the Association as a party, and therefore, the Association was then no longer a party to that action.

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

**iii. The Valtom Action.**

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], one of the unit owners, Valtom, LLC, filed a lawsuit against the Association and its former property management company and former board members on April 11, 2023. *See Valtom, LLC v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012984-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Valtom Action”). Valtom, LLC voluntarily dismissed its action without prejudice.

**iv. The Forty Year Investment Action.**

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], one of the unit owners, Forty Year Investment, LLC, filed a lawsuit against the Association, and its former property management company and former board members on March 31, 2023. *See Forty Year Investment, LLC, v. Prestige Management Solutions, Inc., et al.*, Case No. 2023-012973-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Forty Year Investment Action”). Forty Year Investment, LLC voluntarily dismissed its action without prejudice.

**v. The Deutsche Bank Action.**

As referenced in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51], Deutsche Bank National Trust Company filed a complaint for foreclosure against, *inter alia*, a unit owner, his wife, and the Association on July 27, 2023. *See Deutsche Bank National Trust Co. v. King, et al.*, Case No. 2023-020443-CA-01 (Fla. 11th Cir. Ct. 2023) (the “Deutsche Bank Action”). Service of process had not been properly effectuated upon the Association (*i.e.*, it appears that the plaintiff in that case defectively served the Florida Secretary of State). The Receiver and Lead Counsel appeared in the Deutsche Bank Action on November 14, 2023. Thereafter, the Receiver moved to transfer that case from Division CA-07 to the above-captioned Division CA-11, and moved to dismiss or stay the Deutsche Bank Action. Prior to the January 31, 2024, hearing on the motion to transfer, counsel for Deutsche Bank agreed to the requested transfer, and therefore, the transfer



was granted on January 31, 2024. And, the same day, counsel for Deutsche Bank agreed to a stay of litigation pending the resolution of the partition action referenced *infra*. A hearing on the matter was held on February 22, 2024, and the Court entered an Order Placing Case on Inactive Status on February 23, 2024.

**vi. Mechanic's Lien.**

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

## **H. Legal Proceedings Brought by the Receiver.**

### **i. The Partition Action.**

As referenced in the Receiver's prior reports [D.E. 23, 29, 40, 49, 51], 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").<sup>5</sup>

Since the filing of the Receiver's Fifth Report [D.E. 51], the Court extended the time for the Receiver to effectuate service of process upon the more than 180 respondents in that case (most of which have already been served or signed a waiver of service) up to and including December 18, 2024.<sup>6</sup> The Receiver, through Lead Counsel, has continued his efforts to serve the remaining respondents which have not yet been served.

The Receiver remains hopeful that the Partition Action will result in the condominium property being converted into a fee simple estate, and then sold, and that the funds from the sale

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<sup>5</sup> 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.

<sup>6</sup> As referenced in the Receiver's Second, Third, Fourth, and Fifth Reports [D.E. 29, 40, 49, 51], the Court had previously extended the time for the Receiver to effectuate service of process upon the more than 180 respondents in that case (most of which have already been served or signed a waiver of service) up to and including October 31, 2023, February 29, 2024, and August 20, 2024. While the Receiver, through Lead Counsel, worked diligently to serve the remaining respondents prior to such dates, he was unable to do so, and thus, moved for another extension of time to effectuate service up to and including December 18, 2024.

will be distributed in accordance with the Order Appointing Receiver [D.E. 10] and further orders of the Court.

**ii. The Prestige Action.**

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

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

**iii. The Mechanic's Lien Action.**

On December 15, 2023, the Receiver, through Lead Counsel, sued, *inter alia*, the roofing company which was working on the Association's roof at the time of the January 28, 2023 fire, Elite Innovation Construction, Inc. ("Elite Innovation"), and its owner, Elrod A. Phillips, Jr. (a/k/a Elrod Phillips), to discharge the untimely and otherwise deficient mechanic's lien which they filed against the Association on July 7, 2023 (Book 33784, Pages 1200-1201) in the case styled *Gersten v. Elite Innovation Construction, Inc., et al.*, Case No. 2023-028334-CA-01 (Fla. 11th Cir. Ct. 2023) (the "Mechanic's Lien Action"). Because facial defects in the mechanic's lien referenced condominium Unit Nos. 101 and 214, the Receiver named the owners of such units as defendants in that action. Both unit owners waived service of process. Elite Innovation and Mr. Phillips were

served the complaint and summons on January 5, 2024. As such, their response to the complaint was due by January 25, 2024. Neither Elite Innovation nor Mr. Phillips responded to the complaint or appeared in the case through counsel or otherwise.

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

## **II. Plan for Moving Forward.**

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

## **III. Conclusion.**

The Receiver appreciates the opportunity to assist the Court in this matter. While significant efforts have already yielded progress, the Receiver will continue his efforts as discussed

herein to fulfill his duties under the Court's Order Appointing Receiver [D.E. 10], with the focus on affording the most beneficial and cost-effective solution as to the above-referenced matters.

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

As detailed in the Receiver’s prior reports [D.E. 23, 29, 40, 49, 51] and/or his foregoing Sixth 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”).<sup>7</sup>

The fees and costs incurred by GRSM and Lead Counsel are reflected on the invoices attached hereto as **Composite Exhibit 2**, which reflect the time entries and work performed by the Receiver and Lead Counsel for the benefit of the Association from May 1, 2024, through July 31, 2024,<sup>8</sup> as well as the Receiver’s reductions thereto. The fees and costs incurred by Special Counsel are reflected on the invoices attached hereto as **Composite Exhibit 3** and reflect the time entries and work performed by Special Counsel for the benefit of the Association from April 26, 2024, through July 31, 2024, as well as the Receiver’s reductions thereto.

As reflected in **Composite Exhibit 2**, from May 1, 2024, to July 31, 2024, GRSM incurred fees in the total amount of \$8,005.00, and Lead Counsel incurred fees in the amount of \$53,857.00

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<sup>7</sup> 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.

<sup>8</sup> August 2024 invoices from GRSM, Lead Counsel, and Special Counsel will be submitted with the Receiver’s seventh report.

and costs in the amount of \$118,999.92.<sup>9</sup> As reflected in **Composite Exhibit 3**, from April 26, 2024, to July 31, 2024, Special Counsel incurred fees in the amount of \$6,413.50, and costs in the amount of \$101.42.

The Receiver seeks approval of the foregoing fees and costs, and approval to pay the fees and costs of Special Counsel from April 26, 2024, to July 31, 2024, in the total amount of \$6,514.92. GRSM and Lead Counsel seek approval of their fees and costs from May 1, 2024, to July 31, 2024, but agree to defer payment of such fees until a later time when the Association is better able to pay such fees and costs, or will seek payment from the sale of the property. A proposed order is attached hereto as **Exhibit 4**.

#### **CERTIFICATION**

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

- (a) I have read this application (the “Application”);
- (b) To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the exhibits hereto and such fees as reduced by the Receiver are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- (d) I have not included in the amount for which reimbursement is sought the authorization of the cost of any investment, equipment or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for bulk mailing, photocopies and facsimile transmission);

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<sup>9</sup> Lead Counsel loaned \$111,000.00 to the Receivership for final payment to Demolition Gods LLC, to pay the insurance premium, and other association expenses.

(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,

**GORDON REES SCULLY MANSUKHANI LLP**  
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By: s/Eric R. Thompson  
Eric R. Thompson  
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By: s/Melanie E. Damian  
Melanie E. Damian  
Florida Bar No. 99392  
Peter F. Valori  
Florida Bar No. 004351

**CERTIFICATE OF SERVICE**

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

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

# **EXHIBIT 1**

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

STANDARDIZED FUND ACCOUNTING REPORT

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

Reporting Period 2/7/2022 to 8/12/2024

		Detail	Subtotal	Grand Total
<b>Line 1</b>	Beginning Balance (As of 2/7/2023):	\$ -	\$ -	
	<b>Increases in Fund Balance:</b>			
<b>Line 2</b>	Business Income	\$ -	\$ -	\$ -
<b>Line 3</b>	Cash and Deposits [1]	\$ 1,144,942.17	\$ 1,144,942.17	\$ 1,144,942.17
<b>Line 4</b>	Special Assessment	\$ -	\$ -	\$ -
<b>Line 5</b>	Business Asset Liquidation		\$ -	\$ -
<b>Line 6</b>	Interest	\$ 454.92	\$ 454.92	\$ 454.92
<b>Line 7</b>	Third-Party Litigation Income	\$ -	\$ -	\$ -
<b>Line 8</b>	Miscellaneous - Other	\$ -	\$ -	\$ -
	<b>Total Funds Available (Lines 1-8):</b>			\$ 1,145,397.09
	<b>Decreases in Fund Balance:</b>			
<b>Line 9</b>	Disbursements to Investors			
<b>Line 10</b>	Disbursements for Business Operations [1]	\$ 1,137,197.30	\$ 1,137,197.30	\$ 1,137,197.30
Line 10a	Disbursements to Receiver or Other Professionals	\$ -	\$ -	\$ -
	<b>Total Disbursements for Operations</b>			\$ 1,137,197.30
<b>Line 11</b>	Disbursements for Distribution Expenses Paid by the Fund:	\$ -	\$ -	\$ -
Line 11a	Distribution Plan Expenses:	\$ -	\$ -	\$ -
<b>Line 12</b>	Disbursements to Court/Other	\$ -	\$ -	\$ -
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees	\$ -	\$ -	\$ -
Line 12b	Federal Tax Payments	\$ -	\$ -	\$ -
	<b>Total Disbursements to Court/Other</b>			
	<b>Total Funds Disbursed (Lines 9- 11)</b>			\$ 1,137,197.30
<b>Line 13</b>	<b>Ending Balance (As of August 12, 2024)</b>			\$ 8,199.79
<b>Line 14</b>	<b>Ending Balance of Fund – Net Assets:</b>			
	<b>Total Ending Balance of Fund – Net Assets</b>			\$ 8,199.79

[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**

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

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

<b>Date of Check</b>	<b>From</b>	<b>Amount</b>
8/15/2023	Maintenance Fee Deposit	\$ 269.13
8/16/2023	Maintenance Fee Deposit	\$ 895.81
8/22/2023	Maintenance Fee Deposit	\$ 397.77
8/28/2023	Maintenance Fee Deposit	\$ 626.48
9/1/2023	Maintenance Fee Deposit	\$ 843.60
9/5/2023	Maintenance Fee Deposit	\$ 2,417.11
9/12/2023	Maintenance Fee Deposit	\$ 1,700.79
9/18/2023	Maintenance Fee Deposit	\$ 574.47
9/18/2023	New Wave Loan	\$ 500,000.00
9/29/2023	Maintenance Fee Deposit	\$ 1,747.41
10/2/2023	Maintenance Fee Deposit	\$ 852.74
10/6/2023	Maintenance Fee Deposit	\$ 1,166.14
10/12/2023	Maintenance Fee Deposit	\$ 1,735.56
10/18/2023	Maintenance Fee Deposit	\$ 895.81
10/23/2023	Maintenance Fee Deposit	\$ 851.47
10/31/2023	Maintenance Fee Deposit	\$ 1,435.01
11/6/2023	Maintenance Fee Deposit	\$ 1,024.45
11/14/2023	Maintenance Fee Deposit	\$ 1,293.58
11/17/2023	Maintenance Fee Deposit	\$ 901.13
12/5/2023	Maintenance Fee Deposit	\$ 2,288.01
12/7/2023	Maintenance Fee Deposit	\$ 711.11
12/8/2023	Maintenance Fee Deposit	\$ 313.34
12/14/2023	Maintenance Fee Deposit	\$ 1,293.24
12/19/2023	Maintenance Fee Deposit	\$ 313.34
12/26/2023	Maintenance Fee Deposit	\$ 895.81
1/4/2024	Maintenance Fee Deposit	\$ 1,832.85
1/8/2024	Maintenance Fee Deposit	\$ 1,606.58
1/18/2024	Maintenance Fee Deposit	\$ 851.47
1/29/2024	Maintenance Fee Deposit	\$ 3,976.46
2/1/2024	Maintenance Fee Deposit	\$ 711.11
2/6/2024	Maintenance Fee Deposit	\$ 1,435.21
2/12/2024	Maintenance Fee Deposit	\$ 1,744.49
2/21/2024	Maintenance Fee Deposit	\$ 626.68
2/28/2024	Maintenance Fee Deposit	\$ 895.81
3/1/2024	Maintenance Fee Deposit	\$ 666.90
3/6/2024	Maintenance Fee Deposit	\$ 1,748.21
3/11/2024	Maintenance Fee Deposit	\$ 1,337.79
3/21/2024	Maintenance Fee Deposit	\$ 859.40
3/28/2024	Maintenance Fee Deposit	\$ 269.00
4/2/2024	Maintenance Fee Deposit	\$ 1,832.98
4/4/2024	Maintenance Fee Deposit	\$ 313.34
4/9/2024	Maintenance Fee Deposit	\$ 1,024.45
4/12/2024	Maintenance Fee Deposit	\$ 313.34
4/19/2024	Maintenance Fee Deposit	\$ 269.13
4/25/2024	Maintenance Fee Deposit	\$ 269.13
4/30/2024	Maintenance Fee Deposit	\$ 859.27
5/2/2024	Maintenance Fee Deposit	\$ 1,435.21

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

<b>Date of Check</b>	<b>From</b>	<b>Amount</b>
5/7/2024	Maintenance Fee Deposit	\$ 397.77
5/17/2024	Maintenance Fee Deposit	\$ 1,293.58
5/28/2024	Maintenance Fee Deposit	\$ 582.00
5/31/2024	Maintenance Fee Deposit	\$ 859.40
6/7/2024	Maintenance Fee Deposit	\$ 1,563.85
6/12/2024	Maintenance Fee Deposit	\$ 397.77
6/17/2024	Maintenance Fee Deposit	\$ 313.34
6/20/2024	Damian Valori Culmo Loan	\$ 1,000.00
6/24/2024	Maintenance Fee Deposit	\$ 313.00
6/27/2024	Damian Valori Culmo Loan	\$ 110,000.00
6/28/2024	Maintenance Fee Deposit	\$ 269.00
7/2/2024	Maintenance Fee Deposit	\$ 1,435.21
7/9/2024	Maintenance Fee Deposit	\$ 1,108.88
7/18/2024	Maintenance Fee Deposit	\$ 313.34
7/30/2024	refund of bank fees	\$ 30.00
7/30/2024	Maintenance Fee Deposit	\$ 1,270.09
Total		\$ 1,144,942.17

**City National Bank Interest**

<b>Date</b>	<b>Explanation</b>	<b>Amount</b>
2/28/2023	interest	\$ 0.01
3/31/2023	interest	\$ 0.42
4/30/2023	interest	\$ 45.62
5/31/2023	interest	\$ 25.13
6/30/2023	interest	\$ 8.03
7/31/2023	interest	\$ 2.77
8/31/2023	interest	\$ 1.70
9/30/2023	interest	\$ 28.43
10/31/2023	interest	\$ 69.03
11/30/2023	interest	\$ 60.76
12/31/2023	interest	\$ 55.18
1/31/2024	interest	\$ 57.30
2/29/2024	interest	\$ 45.79
3/31/2024	interest	\$ 34.87
4/30/2024	interest	\$ 18.25
5/31/2024	interest	\$ 0.30
6/30/2024	interest	\$ 0.71
7/31/2024	interest	\$ 0.62
Total		\$ 454.92
<b>GRAND TOTAL OF RECEIPTS</b>		<b>\$ 1,145,397.09</b>

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

<b>Date</b>	<b>From</b>	<b>Amount</b>	
2/27/2023	Returned check	\$ 313.34	
2/27/2023	Returned check bank fee	\$ 12.00	
3/6/2023	Panissa Security	\$ 5,000.00	1004
3/6/2023	John's Garage Door	\$ 299.60	1001
3/6/2023	Waste Connection	\$ 2,422.24	1002
3/7/2023	HSM Consulting, Inc.	\$ 1,800.00	1003
3/14/2023	Panissa Security	\$ 2,909.94	1005
3/14/2023	Appraisal First Real Estate Appraisers	\$ 3,000.00	1006
3/27/2023	Panissa Security	\$ 3,000.00	1007
3/31/2023	Telephone Service	\$ 20.00	
4/5/2023	Legal Fees for closing	\$ 3,500.00	
4/5/2023	Closing Costs	\$ 8,000.00	
4/6/2023	Panissa Security	\$ 2,000.00	1008
4/6/2023	Demolition Gods	\$ 6,500.00	wire
4/6/2023	wire fee	\$ 15.00	
4/6/2023	wire fee	\$ 15.00	
4/7/2023	Stonemark Inc.	\$ 12,598.42	ACH
4/7/2023	Stonemark Inc.	\$ 10.00	
4/7/2023	HSM Consulting	\$ 6,558.82	1009
4/7/2023	Morandi Engineering and Construction	\$ 2,995.00	1010
4/7/2023	Waste Connection	\$ 209.68	1011
4/7/2023	Waste Connection	\$ 576.77	1012
4/7/2023	Panissa Security	\$ 2,909.94	1013
4/7/2023	Panissa Security	\$ 7,909.94	1014
4/7/2023	Fence	\$ 4,800.00	1016
4/7/2023	Insurance	\$ 12,009.21	1017
4/11/2023	Demolition Gods	\$ 6,500.00	
4/11/2023	wire fee	\$ 15.00	
4/11/2023	Avante-Nea Insurance	\$ 4,756.26	
4/17/2023	Stonemark Inc.	\$ 1,428.57	ACH
4/17/2023	Stonemark Inc.	\$ 10.00	
4/18/2023	Panissa Security	\$ 3,954.72	1018
4/18/2023	Panissa Security	\$ 3,954.72	1019
4/19/2023	Demolition Gods	\$ 13,000.00	wire
4/19/2023	wire fee	\$ 15.00	
4/21/2023	Stonemark Inc.	\$ 11,984.21	ACH
4/21/2023	Stonemark Inc.	\$ 10.00	
5/1/2023	Damian & Valori	\$ 137,794.21	
5/1/2023	Gordon Rees Scully Mansukhabi LLP	\$ 32,860.00	
5/1/2023	wire fee	\$ 15.00	
5/1/2023	The Morgan Law Group	\$ 9,020.00	1020

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

<b>Date</b>	<b>From</b>	<b>Amount</b>	
5/1/2023	Stonemark Inc.	\$ 1,346.26	ACH
5/1/2023	Stonemark Inc.	\$ 10.00	
5/1/2023	Telephone Service	\$ 20.00	
5/3/2023	Maverick Security Services LLC	\$ 1,810.44	1022
5/18/2023	New Wave Loan	\$ 3,300.00	
5/18/2023	New Wave Loan	\$ 15.00	
5/18/2023	Stonemark Inc.	\$ 11,984.21	ACH
5/18/2023	Stonemark Inc.	\$ 10.00	
5/19/2023	Panissa Security	\$ 3,954.72	1023
5/19/2023	Maverick Security Services LLC	\$ 8,448.72	1024
5/24/2023	DVS Technologies	\$ 433.35	1025
5/24/2023	DVS Technologies	\$ 379.85	1025
5/24/2023	The Madison Insurance Group	\$ 716.00	ACH
5/2/2023	The Madison Insurance Group	\$ 2.95	
5/31/2023	Telephone Service	\$ 20.00	
6/1/2023	New Wave Loan	\$ 3,300.00	wire
6/1/2023	Maverick Security Services LLC	\$ 8,448.72	1027
6/13/2023	Maverick Security Services LLC	\$ 8,448.72	1028
6/13/2023	Stonemark Inc.	\$ 11,984.21	ACH
6/13/2023	Stonemark Inc.	\$ 10.00	
6/2/2023	The Madison Group	\$ 4,180.05	ACH
6/21/2023	The Madison Group	\$ 2.95	
6/27/2023	Waste Connection	\$ 1,013.33	1029
6/27/2023	The Madison Group	\$ 1,995.00	
6/27/2023	The Madison Group	\$ 2.95	
6/27/2023	Maverick Security Services LLC	\$ 8,448.72	1030
6/30/2023	Telephone Service	\$ 20.00	
7/1/2023	New Wave Loan	\$ 3,300.00	
7/11/2023	Maverick Security Services LLC	\$ 8,649.88	1031
7/14/2023	Action Junk Removal Services	\$ 450.00	1032
7/24/2023	Waste Connection	\$ 77.65	1033
7/25/2023	Vanguard Construction	\$ 10,000.00	1021
7/25/2023	Maverick Security Services LLC	\$ 8,448.72	1034
7/31/2023	Telephone Service	\$ 20.00	
8/1/2023	New Wave Loan	\$ 3,300.00	wire
8/8/2023	Maverick Security Services LLC	\$ 8,448.72	1035
8/22/2023	Maverick Security Services LLC	\$ 8,448.72	1036
8/31/2023	Telephone Service	\$ 20.00	
9/1/2023	New Wave Loan	\$ 3,300.00	wire
9/7/2023	Maverick Security Services LLC	\$ 8,448.72	1037
9/18/2023	New Wave Loan	\$ 10,000.00	wire



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

<b>Date</b>	<b>From</b>	<b>Amount</b>	
9/18/2023	wire fee	\$ 15.00	
9/19/2023	Demolition Gods	\$ 93,750.00	wire
9/19/2023	wire fee	\$ 15.00	
9/19/2023	Sacher Zelman Harman PA	\$ 14,407.00	1038
9/19/2023	Maverick Security Services	\$ 8,448.72	1039
9/29/2023	Telephone Service	\$ 20.00	
10/1/2023	New Wave Loan	\$ 3,300.00	wire
10/6/2023	Maverick Security Sevices	\$ 8,448.72	1040
10/16/2023	Maverick Security Services	\$ 8,448.72	1041
10/18/2023	New Wave Loan	\$ 4,125.00	wire
10/30/2023	Maverick Security Services	\$ 8,448.72	1042
10/31/2023	Telephone Service	\$ 20.00	
11/1/2023	New Wave Loan	\$ 3,300.00	wire
11/14/2023	Maverick Security Services	\$ 8,448.72	1043
11/18/2023	New Wave Loan	\$ 4,125.00	wire
11/28/2023	Maverick Security Services	\$ 8,750.46	1044
11/30/2023	Telephone Service	\$ 20.00	
12/1/2023	New Wave Loan	\$ 3,300.00	wire
12/7/2023	Sacher Zelman Harman PA	\$ 7,198.35	1045
12/13/2023	Maverick Security Services	\$ 8,488.72	1046
12/18/2023	New Wave Loan	\$ 4,125.00	wire
12/27/2023	Maverick Security Services	\$ 8,750.46	1047
12/29/2023	HSM Consulting	\$ 825.00	1048
12/30/2023	Telephone Service	\$ 20.00	
1/1/2024	New Wave Loan	\$ 3,300.00	
1/2/2024	City of Miami Gardens	\$ 2,817.50	1049
1/10/2024	Maverick Security Services	\$ 9,353.94	1050
1/18/2024	New Wave Loan	\$ 4,125.00	
1/18/2024	City of Miami Gardens	\$ 10,092.50	1051
1/24/2024	Maverick Security Services	\$ 8,448.72	1053
1/30/2024	charge back	\$ 313.34	
1/30/2024	bank fee	\$ 12.00	
1/30/2024	Telephone Service	\$ 20.00	
2/1/2024	New Wave Loan	\$ 3,300.00	
2/5/2024	Jacqueline Greenberg CPA LLC	\$ 273.74	1052
2/6/2024	Maverick Security Services	\$ 8,448.72	1054
2/20/2024	New Wave Loan	\$ 4,125.00	
2/21/2024	City of Miami Gardens	\$ 264.10	1055
2/21/2024	Maverick Security Services	\$ 8,448.72	1056
2/26/2024	Sacher Zelman Harmon PA	\$ 19,682.82	1057
2/26/2024	Cimo Mazer Mark PLLC	\$ 4,102.50	1058

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

<b>Date</b>	<b>From</b>	<b>Amount</b>	
2/28/2024	Telephone Service	\$ 20.00	
3/1/2024	New Wave Loan	\$ 3,300.00	
3/6/2024	Maverick Security Services	\$ 8,448.72	1059
3/18/2024	Demolition Gods	\$ 93,750.00	
3/18/2024	Demolition Gods	\$ 15.00	
3/18/2024	New Wave Loan	\$ 4,125.00	
3/19/2024	Maverick Security Services	\$ 8,448.72	1062
3/20/2024	Alex Ochoa - lawn maintenance	\$ 400.00	1061
3/31/2024	Telephone Service	\$ 20.00	
4/1/2024	New Wave Loan	\$ 3,300.00	
4/2/2024	Madison Insurance	\$ 5,072.55	
4/2/2024	Madison Insurance	\$ 2.95	
4/3/2024	Maverick Security Services	\$ 8,448.72	1063
4/10/2024	Avante - Nea Insurance	\$ 5,086.19	
4/18/2024	New Wave Loan	\$ 4,125.00	
4/18/2024	Maverick Security Services	\$ 8,448.72	1064
4/25/2024	Demolition Gods	\$ 93,750.00	
4/25/2024	Demolition Gods	\$ 15.00	
4/30/2024	Telephone Service	\$ 20.00	
5/1/2024	New Wave Loan	\$ 3,300.00	
5/2/2024	Maverick Security Services	\$ 6,839.44	1065
5/18/2024	New Wave Loan	\$ 4,125.00	
5/30/2024	Telephone Service	\$ 20.00	
6/1/2024	New Wave Loan	\$ 3,300.00	
6/18/2024	New Wave Loan	\$ 4,125.00	
6/28/2024	Demolition Gods	\$ 93,750.00	
6/28/2024	Demolition Gods	\$ 15.00	
6/30/2024	Telephone Service	\$ 20.00	
7/1/2024	New Wave Loan	\$ 3,300.00	
7/2/2024	The Madison Insurance Group	\$ 2,312.95	
7/18/2024	New Wave Loan	\$ 4,125.00	
7/29/2024	Telephone Service	\$ 20.00	
8/1/2024	New Wave Loan	\$ 3,300.00	
<b>GRAND TOTAL OF EXPENSES</b>		<b>\$ 1,137,197.30</b>	

# **COMPOSITE EXHIBIT 2**

# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(510) 463-8600

Tax ID: 94-1617026

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

June 18, 2024  
ID: GERSP 1299620  
Invoice No. 21601874  
Gersten, David M.

RE: Baptiste v. New World Condominium

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## BILLING SUMMARY THROUGH May 31, 2024

Fees For Professional Services:	\$4,330.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$4,330.00</b>

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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>
05/01/24	Review and respond to Peter Valori email re: mediation .1; review new filed court document .1; review motion filed in case .2	DMG2	0.40
05/02/24	Conference with Peter Valori and Eric Thompson re: insurance coverage/mediation issues .7; review and respond to Peter Valori email re: insurance analysis .1	DMG2	0.80
05/02/24	Telephone conference with D. Gersten and Peter Valori, Esq. to discuss analysis of claim by Association owners and renters for insurance proceeds against management company (Prestige Management)	ERT	0.70
05/02/24	Analyze Florida federal and state case law and non-Florida federal case law addressing the application of "professional service" exclusions/endorsements in insurance policies in furtherance of evaluating claim by Association owners and renters for insurance proceeds against management company (Prestige Management), including, but not limited to, analyze and shepardize the following case law: 1) GRE Ins. Group v. Metropolitan Boston Housing Partnership (1st Cir. 1995), 8 pages; 2) Pennsylvania Nat'l Mutual Casualty Ins. Co. v. Roberts Brothers, Inc. (S.D. Ala. 2008), 16 pages; 3) Bonnie Owen Realty, Inc. v. Cincinnati Ins. Co. (App. Ill. 1996), 8 pages; 4) Penn Star Ins Co. v. Real Estate Consulting Specialists, Inc. (D. Mon. 2014), 8 pages; and 5) Newman v. Scottsdale Ins Co. (Mon. 2013), 16 pages	ERT	1.60
05/02/24	Analyze Florida federal and state case law and non-Florida federal case law addressing the application of "professional service" exclusions/endorsements together with "real estate property managed" endorsements in insurance policies in furtherance of evaluating claim by Association owners and renters for insurance proceeds against management company (Prestige Management)	ERT	0.50
05/02/24	Analyze Florida federal and state case law and non-Florida federal case law addressing the application of "real estate property managed" endorsements in insurance policies in furtherance of evaluating claim by Association owners and renters for insurance proceeds against management company (Prestige Management)	ERT	0.70
05/02/24	Email correspondence with Peter Valori, Esq. regarding claim by Association owners and renters for insurance proceeds against management company (Prestige Management) in furtherance of continued evaluation of said claim	ERT	0.20

David Gersten Special Magistrate  
ID: GERSP 1299620  
Invoice No.: 21601874

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05/05/24	Review and respond to Peter Valori emails re: mediation .1	DMG2	0.10
05/08/24	Review and respond to Rick Zelman email with bill attached for review .2; review and respond to Peter Valori email re: global mediation .1	DMG2	0.30
05/13/24	Review court order .1	DMG2	0.10
05/14/24	Review and respond to Peter Valori email re: order and status .1; review report filed in court case .1	DMG2	0.20
05/15/24	Review Joe Seara email with draft report attached for review and editing .9; review billing(s) .3	DMG2	1.20
05/17/24	Review motion filed in case .1	DMG2	0.10
05/20/24	Review motion filed in case .1	DMG2	0.10
05/21/24	Review and respond to Mary Dhanji email re: insurance .1; review court case filing .1	DMG2	0.20
05/22/24	Review new order in court case .1; review and respond to Laura Ledworth email re: insurance form .1	DMG2	0.20
05/23/24	Review and respond to Peter Valori email re: demolition/hydroseed .1	DMG2	0.10

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### 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	3.80	2,850.00
ERT	Eric Thompson	Partner	400.00	3.70	1,480.00

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**TOTAL FOR SERVICES**

**\$4,330.00**

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### Outstanding Statements as of June 18, 2024

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
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David Gersten Special Magistrate  
ID: GERSP 1299620  
Invoice No.: 21601874

June 18, 2024  
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<b><u>Invoice Number</u></b>	<b><u>Date</u></b>	<b><u>Balance Due</u></b>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Statement No 21424056	October 12, 2023	\$4,275.00
Statement No 21445391	November 13, 2023	\$2,720.00
Statement No 21471323	December 15, 2023	\$3,580.00
Statement No 21497136	January 26, 2024	\$3,400.00
Statement No 21503476	February 7, 2024	\$2,715.00
Statement No 21538132	March 22, 2024	\$1,575.00
Statement No 21550055	April 10, 2024	\$4,575.00
Statement No 21575686	May 14, 2024	\$4,465.00
<b>Total Accounts Receivable Balance:</b>		<b><u><u>\$79,069.97</u></u></b>

---

# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300  
Walnut Creek CA 94596-3580  
(510) 463-8600  
Tax ID: 94-1617026

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

June 18, 2024  
ID: GERSP 1299620  
Invoice No. 21601874  
Gersten, David M.

RE: Baptiste v. New World Condominium

---

## BILLING SUMMARY THROUGH May 31, 2024

Fees For Professional Services:	\$4,330.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$4,330.00</b>

---

### 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: 21601874

### LOCKBOX ADDRESS FOR CHECKS

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

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# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(510) 463-8600

Tax ID: 94-1617026

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

July 11, 2024  
ID: GERSP 1299620  
Invoice No. 21619540  
Gersten, David M.

RE: Baptiste v. New World Condominium

---

## BILLING SUMMARY THROUGH June 30, 2024

Fees For Professional Services:	\$2,550.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$2,550.00</b>

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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>
06/05/24	Review latest court filing	DMG2	0.10
06/06/24	Review and respond to Peter Valori email re: mediation issues upcoming .2	DMG2	0.20
06/07/24	Review and respond to Rick Zelman email re: bill .1	DMG2	0.10
06/10/24	Attend mediation 2.2; review and respond to Peter Valori email re: mediation .1	DMG2	2.30
06/11/24	Review and respond to Peter Valori email re: letter to GL carrier .1	DMG2	0.10
06/17/24	Review and respond to Peter Valori email re: fire expert .1; review and respond to Peter Valori email re: text .1; review and respond to Peter Valori email re: electric work .1	DMG2	0.30
06/23/24	Review and respond to Peter Valori email re: mediation .1	DMG2	0.10
06/24/24	Review and respond to Peter Valori email re: next mediation .1; review and respond to CPA email re: tax return .1	DMG2	0.20

---

## Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	3.40	2,550.00

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**TOTAL FOR SERVICES**

**\$2,550.00**

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## Outstanding Statements as of July 11, 2024

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
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David Gersten Special Magistrate  
ID: GERSP 1299620  
Invoice No.: 21619540

July 11, 2024  
Page 3

<b><u>Invoice Number</u></b>	<b><u>Date</u></b>	<b><u>Balance Due</u></b>
Statement No 21326723	May 17, 2023	\$15,955.00
Statement No 21354168	June 29, 2023	\$3,145.00
Statement No 21374087	July 31, 2023	\$4,895.00
Statement No 21387879	August 18, 2023	\$20,314.97
Statement No 21415053	September 28, 2023	\$7,455.00
Statement No 21424056	October 12, 2023	\$4,275.00
Statement No 21445391	November 13, 2023	\$2,720.00
Statement No 21471323	December 15, 2023	\$3,580.00
Statement No 21497136	January 26, 2024	\$3,400.00
Statement No 21503476	February 7, 2024	\$2,715.00
Statement No 21538132	March 22, 2024	\$1,575.00
Statement No 21550055	April 10, 2024	\$4,575.00
Statement No 21575686	May 14, 2024	\$4,465.00
Statement No 21601874	June 18, 2024	\$4,330.00
<b>Total Accounts Receivable Balance:</b>		<b><u><u>\$83,399.97</u></u></b>

---

# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300  
Walnut Creek CA 94596-3580  
(510) 463-8600  
Tax ID: 94-1617026

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

July 11, 2024  
ID: GERSP 1299620  
Invoice No. 21619540  
Gersten, David M.

RE: Baptiste v. New World Condominium

---

## BILLING SUMMARY THROUGH June 30, 2024

Fees For Professional Services:	\$2,550.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$2,550.00</b>

---

### 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: 21619540

### LOCKBOX ADDRESS FOR CHECKS

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

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# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300

Walnut Creek CA 94596-3580

(510) 463-8600

Tax ID: 94-1617026

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

August 14, 2024  
ID: GERSP 1299620  
Invoice No. 21646597  
Gersten, David M.

RE: Baptiste v. New World Condominium

---

## BILLING SUMMARY THROUGH July 31, 2024

Fees For Professional Services:	\$1,125.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$1,125.00</b>

---

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>
07/01/24	Review and respond to Peter Valori email re: mike Levine .1	DMG2	0.10
07/04/24	Review and respond to Melanie Damian email re: permit .1	DMG2	0.10
07/07/24	Review motion filed in court case .1	DMG2	0.10
07/08/24	Review and respond to CPA email re: tax issues re: filing .1; review and respond to Rick Zelman email re: invoice .1	DMG2	0.20
07/09/24	Review order in court case .1; review and respond to Mary Dhanji email re: interest on loans .1	DMG2	0.20
07/11/24	Review court order .1; review and respond to Pete Valori email re: Mazur .1; review and respond to email(s) from Peter Valori re: retainer .2; review and respond to Peter Valori email re: status conference .1	DMG2	0.50
07/30/24	Review and respond to Reesea Setae re: meeting .1; review and respond to Peter Valori re: administrator .1	DMG2	0.20
07/31/24	Review new court motion filed .1	DMG2	0.10

### Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	750.00	1.50	1,125.00

**TOTAL FOR SERVICES** **\$1,125.00**

### Outstanding Statements as of August 14, 2024

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
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<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
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Statement No 21497136	January 26, 2024	\$3,400.00
Statement No 21503476	February 7, 2024	\$2,715.00
Statement No 21538132	March 22, 2024	\$1,575.00
Statement No 21550055	April 10, 2024	\$4,575.00
Statement No 21575686	May 14, 2024	\$4,465.00
Statement No 21601874	June 18, 2024	\$4,330.00
Statement No 21619540	July 11, 2024	\$2,550.00
<b>Total Accounts Receivable Balance:</b>		<b>\$85,949.97</b>

---

# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

100 Pringle Avenue, Suite 300  
Walnut Creek CA 94596-3580  
(510) 463-8600  
Tax ID: 94-1617026

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

August 14, 2024  
ID: GERSP 1299620  
Invoice No. 21646597  
Gersten, David M.

RE: Baptiste v. New World Condominium

---

## BILLING SUMMARY THROUGH July 31, 2024

Fees For Professional Services:	\$1,125.00
Expenses and Advances:	<u>0.00</u>
<b>Current Bill:</b>	<b>\$1,125.00</b>

---

### 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: 21646597

### LOCKBOX ADDRESS FOR CHECKS

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

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

# INVOICE

Invoice # 949  
 Date: 07/31/2024

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

## MME1676

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

#### Professional Fees

Date	Description	Staff	Hours	Rate	Amount
05/01/2024	Work on stipulation as to entry of default final judgment concerning V. Higgs and Y. Barnes.	JS	0.80	\$295.00	\$236.00
05/01/2024	Met with P. Valori regarding New World service issues and strategy for resolving same (.3); review background materials, complaint, amended complaint, and motion for summary judgment prepare notes and annotations concerning same (1.0).	RPS	1.30	\$450.00	\$585.00
05/01/2024	Draft email to process server regarding status update and review response to same.	RPS	0.10	\$450.00	\$45.00
05/01/2024	Review file regarding unit of deceased owner for potential opening of estate (.5); draft email to L. Landry regarding same (.2); draft amended notice of voluntary dismissal for Aegis (.2); email to counsel regarding same in partition action (.1); review court file and motion for default final judgment (.3); conference with P. Valori regarding stipulation to motion to defendants Volrick Higgs and Yvonne Barnes in case against roofers (.3).	rs	1.60	\$100.00	\$160.00
05/01/2024	Review email from class counsel regarding owner class.	PFV	0.10	\$550.00	\$55.00
05/01/2024	Draft email to receiver and counsel regarding status and planning.	PFV	0.10	\$550.00	\$55.00

05/01/2024	Review affidavit regarding unit 129 regarding title matters as to partition case.	PFV	0.10	\$550.00	\$55.00
05/01/2024	Email and call regarding Cardinal Andrews estate.	PFV	0.30	\$550.00	\$165.00
05/02/2024	Email regarding financing needs and next steps before sale.	MME	0.40	\$550.00	\$220.00
05/02/2024	Draft memorandum regarding all pending service of process on defendants in partition action.	rs	1.50	\$100.00	\$150.00
05/02/2024	Work on stipulation regarding final judgment in Elite case.	PFV	0.20	\$550.00	\$110.00
05/02/2024	Call with Eric Thompson and Receiver regarding insurance matters as to Prestige claims.	PFV	0.70	\$550.00	\$385.00
05/02/2024	Email regarding hydroseed quote.	PFV	0.10	\$550.00	\$55.00
05/02/2024	Research and email regarding request for second hydro seed quote.	PFV	0.20	\$550.00	\$110.00
05/02/2024	Email with counsel for owner class and with Receiver regarding Prestige policies.	PFV	0.30	\$550.00	\$165.00
05/03/2024	Review list of unserved defendants and notes concerning past service attempts and prepare notes concerning same (1.7); teleconference with process server regarding status and potential use of substituted service (.4).	RPS	2.10	\$450.00	\$945.00
05/03/2024	Review e-mail from interested purchaser regarding status of demolition and partition case.	PFV	0.10	\$550.00	\$55.00
05/06/2024	Research regarding the movants' lack of standing to intervene in the partition action.	JS	0.90	\$295.00	\$265.50
05/06/2024	Review file regarding potential purchasers in partition action (.3); emails to V. Higgs and Y. Barnes regarding stipulation as to motion for default final judgment in case against roofers (.2).	rs	0.50	\$100.00	\$50.00
05/07/2024	Attend hearing on motion for extension of time to effectuate service.	JS	0.40	\$295.00	\$118.00
05/07/2024	Work on the Receiver's response in opposition to the motion to intervene; update research regarding the necessary interest to intervene; research regarding accepting the pleadings and record as they are when movants seek to intervene; research regarding the inability to inject new or contingent issues into the pending litigation.	JS	1.20	\$295.00	\$354.00
05/07/2024	(No charge) Review file in connection with remaining unserved defendants. Prepared notes concerning same (.7); correspondence with D. Marin and phone call regarding pending skip traces (.4); internet and social media research on Good Deeds, LLC to locate	RPS	2.90	\$0.00	\$0.00

	additional addresses or contact information (.8); internet and social media research on Beneficial Florida Inc (1.0).				
05/07/2024	Update research on service of process statute and identify requirements for substituted service; prepared annotated index concerning same.	RPS	2.10	\$450.00	\$945.00
05/07/2024	Draft proposed order on motion for extension of time to effectuate service in partition action.	rs	0.30	\$100.00	\$30.00
05/07/2024	Conference with Robert Santiago regarding status of service of process and review file regarding same.	PFV	0.20	\$550.00	\$110.00
05/07/2024	Prepare for (.2); and attend (.4); hearing on motion to extend time to complete service to process upon remaining respondents in partition action.	PFV	0.60	\$550.00	\$330.00
05/08/2024	Review affidavit of service for Rusol & Co; teleconference with D. Marin regarding same, suggested revisions regarding same.	RPS	0.60	\$450.00	\$270.00
05/08/2024	Review file regarding lienholder, Deutsche Bank in partition action.	rs	0.30	\$100.00	\$30.00
05/08/2024	Prepare order on motion for extension of time to serve respondents in partition action.	PFV	0.10	\$550.00	\$55.00
05/08/2024	Review email regarding service of Rusol company.	PFV	0.10	\$550.00	\$55.00
05/08/2024	Review invoice from real estate transactional lawyer regarding matters concerning clearing title as to partition case.	PFV	0.10	\$550.00	\$55.00
05/08/2024	Email regarding status of global mediation conference regarding Prestige matters.	PFV	0.10	\$550.00	\$55.00
05/09/2024	Work on stipulation as to motion for default final judgment by V. Higgs (.2); email to V. Higgs regarding same (.2); telephone conference with daughter of Y. Barnes regarding stipulation as to motion for default final judgment (.3); email to daughter regarding same in case against roofers (.2).	rs	0.90	\$100.00	\$90.00
05/09/2024	Email regarding stipulation by owner defendants and non-military service issue regarding motion for final default.	PFV	0.30	\$550.00	\$165.00
05/09/2024	Email regarding status of service of process.	PFV	0.20	\$550.00	\$110.00
05/09/2024	Work on update of potential purchaser list.	PFV	0.30	\$550.00	\$165.00
05/10/2024	Continue working on the Receiver's response in opposition to motion to intervene, with a focus on the inability to introduce new or contingent issues to the pending litigation and research regarding same.	JS	4.00	\$295.00	\$1,180.00
05/10/2024	(No charge) Review order on Receiver's motion for	JS	0.10	\$0.00	\$0.00

	extension of time to complete service of process.				
05/10/2024	Correspondence with P. Valori regarding status of service of process.	RPS	0.20	\$450.00	\$90.00
05/13/2024	Continue working on the Receiver's fifth report.	JS	1.20	\$295.00	\$354.00
05/13/2024	Work on declaration regarding E. Phillips' nonmilitary affidavit, with a focus on the thoroughness of the search conducted by the Servicemembers Civil Relief Act Centralized Verification Service.	JS	1.40	\$295.00	\$413.00
05/13/2024	Attend hearing on motion for default final judgment as to E. Phillips, Y. Barnes, and V. Higgs.	JS	0.10	\$295.00	\$29.50
05/13/2024	Work on proposed order granting default final judgment as to Elite Innovation Construction, Inc. and E. Phillips, with a focus on quieting title to the Condominium Property, the Higgs unit, and the Barnes unit, and with a focus on discharging the mechanic's lien as to same.	JS	3.80	\$295.00	\$1,121.00
05/13/2024	Work on supplemental declaration regarding non-military status of E. Phillips.	PFV	0.20	\$550.00	\$110.00
05/13/2024	Review service of process status report and draft email regarding same.	PFV	0.30	\$550.00	\$165.00
05/14/2024	Continue working on the Receiver's fifth report and fee application, with a focus on the standardized fund accounting report, the partition action, the Prestige action, the mechanic's lien action, and the finances and assets of the Association and receivership estate.	JS	3.70	\$295.00	\$1,091.50
05/14/2024	Continue working on proposed order for default final judgment as to Elite Innovation, Inc. and E. Phillips (.3); correspondence with R. Zelman regarding same (.1).	JS	0.40	\$295.00	\$118.00
05/14/2024	Review order granting motion for extension of time to complete service process in partition case and draft e-mail to Receiver regarding status.	PFV	0.20	\$550.00	\$110.00
05/14/2024	Review and revise lien discharge and quiet title order as to claim against elite innovation.	PFV	0.20	\$550.00	\$110.00
05/14/2024	Conference regarding preparation of quarterly report in receivership action.	PFV	0.20	\$550.00	\$110.00
05/14/2024	Work on Receiver's fifth status report.	PFV	0.80	\$550.00	\$440.00
05/15/2024	Continue working on the Receiver's fifth report and fee application, with a focus fees incurred by the Receiver, Lead Counsel, and Special Counsel and legal proceedings filed against the Association.	JS	1.70	\$295.00	\$501.50
05/15/2024	Conference with R. Zelman regarding legal description of New World Condominium and proof of service as to E. Phillips and Elite Innovation, Inc (.1); correspondence with R. Zelman regarding motion for	JS	0.20	\$295.00	\$59.00

	default final judgment and proof of service (.1).				
05/15/2024	Continue working on the Receiver's response in opposition to motion to intervene, with a focus on the movants' lack of standing to intervene and research regarding same.	JS	1.80	\$295.00	\$531.00
05/15/2024	Additional work on Receiver's fifth report.	PFV	0.40	\$550.00	\$220.00
05/15/2024	Conference and analysis of legal arguments in opposition to motion to intervene filed by Thomas Plaintiffs in partition case.	PFV	0.40	\$550.00	\$220.00
05/16/2024	Email correspondence with R. Zelman regarding legal description for New World Condominium Apartments.	JS	0.10	\$295.00	\$29.50
05/16/2024	Continue working on default final judgment as to Elite Innovation Construction, Inc. and E. Phillips, with a focus on the legal description for New World Condominium Apartments.	JS	0.30	\$295.00	\$88.50
05/16/2024	Review and respond to correspondence from P. Valori and R. Saetae regarding service of process issues in the partition case.	RPS	0.50	\$450.00	\$225.00
05/16/2024	Conference with counsel for Ms. Anderson regarding service of process issues in the partition case.	PFV	0.20	\$550.00	\$110.00
05/16/2024	Draft email regarding waiver of service of process regarding Ms. Anderson.	PFV	0.10	\$550.00	\$55.00
05/16/2024	Email regarding form of order as to claim against Elite Innovation regarding title issues.	PFV	0.30	\$550.00	\$165.00
05/17/2024	Review status updates form G. Santa Cruz regarding service of process issues in the partition case.	RPS	0.40	\$450.00	\$180.00
05/17/2024	Work on second amended complaint.	RPS	0.60	\$450.00	\$270.00
05/17/2024	Draft notice of filing waivers in partition action.	rs	0.50	\$100.00	\$50.00
05/19/2024	Review notice of filing waivers of service of process and draft litigation planning instructions to paralegal.	PFV	0.20	\$550.00	\$110.00
05/20/2024	Review joint motion to withdraw as counsel as to Daniel Wagner - The Law Firm and Prieto Law Group.	JS	0.10	\$295.00	\$29.50
05/20/2024	Emails to and from R. Zellman regarding unit 245 in partition action.	rs	0.30	\$100.00	\$30.00
05/20/2024	Review US Bank National's answer and affirmative defenses.	PFV	0.40	\$550.00	\$220.00
05/21/2024	Review entry of default final judgment as to Elite Innovation Construction, Inc. and E. Phillips.	JS	0.10	\$295.00	\$29.50
05/21/2024	Continue working on response in opposition to the motion to intervene, with a focus on movants' status as	JS	0.80	\$295.00	\$236.00

	former lessees of the property.				
05/21/2024	Review email regarding crime policy.	PFV	0.20	\$550.00	\$110.00
05/21/2024	Review proposed motion and order on motion to withdraw filed by 40 year's counsel and draft email regarding same.	PFV	0.20	\$550.00	\$110.00
05/22/2024	Email correspondence with C. Prieto regarding motion to withdraw.	JS	0.10	\$295.00	\$29.50
05/22/2024	Teleconference with D. Marin regarding service of process issues.	RPS	0.20	\$450.00	\$90.00
05/23/2024	Continue working on the response in opposition to motion to intervene, with a focus on the movants introducing new and contingent issues to the litigation.	JS	0.60	\$295.00	\$177.00
05/23/2024	Teleconference with D. Marin regarding service of process issues (.2); attempt to contact R. Kinel (.1); conference with G. Santa Cruz regarding status of service of process issues (.4).	RPS	0.70	\$450.00	\$315.00
05/23/2024	Email with demolition company regarding demolition completion and hydroseed application.	PFV	0.20	\$550.00	\$110.00
05/23/2024	Draft status email to Receiver.	PFV	0.10	\$550.00	\$55.00
05/24/2024	Continue working on the Receiver's response in opposition to the motion to intervene, with a focus on the movants' lack of standing to intervene.	JS	0.40	\$295.00	\$118.00
05/24/2024	Correspondence with R. Saetae regarding motion for substitution of parties (.2); teleconference with D. Marin regarding status of service of process (.2); draft revised memorandum of outstanding parties to be served, efforts and status, and recommendations concerning same (.8).	RPS	1.20	\$450.00	\$540.00
05/25/2024	(No charge) Work on proposed order granting the Receiver's application for order authorizing payment of fees and expenses and for authorization to distribute funds.	JS	0.30	\$0.00	\$0.00
05/25/2024	Review file regarding Safe Financial (.3); emails from and to counsel for Safe Financial (.2); email to R. Zellman regarding same in partition action (.1).	rs	0.60	\$100.00	\$60.00
05/27/2024	Review email regarding units requiring attention as to partition case.	PFV	0.30	\$550.00	\$165.00
05/27/2024	Email regarding unit owner account summaries.	PFV	0.20	\$550.00	\$110.00
05/27/2024	Review update email regarding demolition.	PFV	0.10	\$550.00	\$55.00
05/27/2024	Review correspondence regarding governmental liens.	PFV	0.10	\$550.00	\$55.00
05/27/2024	Review non-identity affidavit regarding Simpson unit.	PFV	0.10	\$550.00	\$55.00

05/27/2024	Email regarding tax return filing status.	PFV	0.10	\$550.00	\$55.00
05/28/2024	Teleconference with D. Marin regarding skip trace results and updates on service process issues.	RPS	0.40	\$450.00	\$180.00
05/28/2024	(No charge) Conference with G. Santa Cruz regarding status of task list and revisions to same.	RPS	0.70	\$0.00	\$0.00
05/28/2024	Review and revise draft notices of dismissal.	RPS	0.50	\$450.00	\$225.00
05/29/2024	Review order granting Receiver's application for order authorizing payment of fees and expenses and for authorization to distribute funds.	JS	0.10	\$295.00	\$29.50
05/29/2024	Conference with P. Valori and G. Santa Cruz regarding status of parties to be served with process and status of parties seeking dismissal; prepared notes and action items regarding same (1.0); research regarding method of service for fictitious entity (.7).	RPS	1.70	\$450.00	\$765.00
05/29/2024	Teleconfernce with D. Marin regarding status of service (.4); teleconference with C. Black to negotiate manner of service of process and discussion regarding the purpose and status of the action and associated questions (.8).	RPS	1.20	\$450.00	\$540.00
05/29/2024	Conference regarding status and planning as to remaining persons to be served and requests for dismissal and amendments to complaint needed.	PFV	1.00	\$550.00	\$550.00
05/29/2024	Conference and case analysis regarding service by publication and amendments made after service of process.	PFV	0.50	\$550.00	\$275.00
05/30/2024	Telecon with R. Kinel.	RPS	0.20	\$450.00	\$90.00
05/30/2024	Correct with D. Marin regarding status of service issues (.2); research regarding specific requirements for substituted service and comparison to prior version of service statute for compliance with current and former requirements. Prepare brief memorandum concerning same (1.9).	RPS	2.10	\$450.00	\$945.00
05/30/2024	Emails from and to R. Zellman regarding various defendants to be dismissed from action (.2); email to counsel for Safe Financial regarding status of affidavit by homeowner (.2).	rs	0.40	\$100.00	\$40.00
05/30/2024	Work on financing the next round needed before sale.	MME	0.30	\$550.00	\$165.00
05/31/2024	Conference with R. Zelman, P. Valori, and G. Santa Cruz (1.0); telecon with Cordell Black regarding service of process and status of the action (.7); correspondence with D. Marin to arrange for service (.2).	RPS	1.90	\$450.00	\$855.00
05/31/2024	Conference regarding case planning as to status and planning as to problem units.	PFV	1.00	\$550.00	\$550.00

06/02/2024	Review email regarding service of process on Cordell Black.	PFV	0.20	\$550.00	\$110.00
06/03/2024	Teleconference and follow up correspondence regarding the estate of Cardinal Andrews (.5); prepare follow up correspondence regarding same (.1); conference with process server regarding preparation of diligence affidavits and discuss plan regarding further service attempts (.6).	RPS	1.20	\$450.00	\$540.00
06/03/2024	Review voluntary dismissals as to certain defendants in partition action with resolved interests.	PFV	0.20	\$550.00	\$110.00
06/04/2024	Receipt and review of emails from R. Zellman regarding dismissal of various defendants (.2); draft notices of voluntary dismissal with prejudice for various defendants (.5).	rs	0.70	\$100.00	\$70.00
06/05/2024	Review affidavit of service for Cordell Black and prepared correspondence regarding same.	RPS	0.40	\$450.00	\$180.00
06/05/2024	Review disclaimer regarding Tradition Community Association regarding unit 208.	PFV	0.10	\$550.00	\$55.00
06/10/2024	Prepare for and attend Global Mediation regarding Prestige cases.	PFV	2.90	\$550.00	\$1,595.00
06/12/2024	(No charge) Review file regarding defendants requesting dismissals (2); email to R. Zellman regarding Tradition Community Assoc. (.1).	rs	0.30	\$0.00	\$0.00
06/12/2024	Teleconference with Cordell Black explaining nature of the case, answering his inquiries and arranging for his acceptance of service of process (.9); telecon with R. Kinel regarding status of Cardinal Andrews estate (.4).	RPS	1.30	\$450.00	\$585.00
06/12/2024	Teleconference with process server regarding status of service issues and arranging for service upon Cordell Black (.4); correspondence with process server x3 (.5); internet research regarding Good Deeds LLC (.6).	RPS	1.50	\$450.00	\$675.00
06/13/2024	Review affidavits of diligence in connection with service by publication x4 and suggested revisions regarding same (.6); telecon with process server regarding additional requirements for affidavits and correspondence regarding same (.6).	RPS	1.20	\$450.00	\$540.00
06/13/2024	Receipt and review of email from R. Zellman (.1); draft notice of voluntary dismissal with prejudice as to Tradition Community Association (.2); update spreadsheet regarding same (.2).	rs	0.50	\$100.00	\$50.00
06/14/2024	Working on new financing.	MME	0.50	\$550.00	\$275.00
06/14/2024	Email with counsel for renter class action plaintiff regarding request for expert witness information.	PFV	0.20	\$550.00	\$110.00
06/14/2024	Review list of requested documents by renter group	PFV	0.20	\$550.00	\$110.00



	from expert witness.				
06/14/2024	Email regarding CGL carrier position as to Prestige litigation and continuation of mediation.	PFV	0.20	\$550.00	\$110.00
06/14/2024	Review photos and videos regarding response to request for documents by renter class action plaintiffs.	PFV	0.50	\$550.00	\$275.00
06/14/2024	Review affidavit of diligent search as to certain remaining unserved defendants in the partition action.	PFV	0.20	\$550.00	\$110.00
06/17/2024	Follow up with process server regarding diligence affidavit for Good Deeds, LLC. and status.	RPS	0.60	\$450.00	\$270.00
06/17/2024	Email with counsel for renter class regarding response to request for fire photos and response to request for access to physical evidence.	PFV	0.40	\$550.00	\$220.00
06/17/2024	Additional email regarding compensation for expert for inspection of physical evidence.	PFV	0.30	\$550.00	\$165.00
06/19/2024	Working on additional financing, telephone call with Receiver regarding same.	MME	0.40	\$550.00	\$220.00
06/20/2024	Teleconference with process server regarding status of unserved defendants and plan going forward (.6); draft correspondence to R. Kinel regarding Cardinal Andrews estate (.3); teleconference with attorney from family regarding estate (.3).	RPS	1.20	\$450.00	\$540.00
06/21/2024	Reviewing status and working on financing.	MME	0.30	\$550.00	\$165.00
06/23/2024	Email with class counsel for owners regarding continued mediation and planning regarding same.	PFV	0.40	\$550.00	\$220.00
06/24/2024	Update response in opposition to motion to intervene, with a focus on the underlying facts.	JS	0.70	\$295.00	\$206.50
06/24/2024	Prepare for and attend mediation session.	PFV	1.30	\$550.00	\$715.00
06/25/2024	Analysis regarding response in opposition to motion to intervene, with a focus on the purpose of the partition action.	JS	0.80	\$295.00	\$236.00
06/25/2024	Attending hearing on motion to withdraw filed by 40 Year.	PFV	0.20	\$550.00	\$110.00
06/25/2024	Review Notice of dismissal regarding Tradition Community Association.	PFV	0.20	\$550.00	\$110.00
06/27/2024	Update outline regarding response in opposition to motion to intervene, with a focus on prejudgment attachment.	JS	1.10	\$295.00	\$324.50
06/27/2024	Emails from Receiver forwarding signed proposal for General Liability insurance and review same.	KDM	0.20	\$525.00	\$105.00
06/27/2024	Update call with Receiver (.2); update call with co-	MME	0.60	\$550.00	\$330.00

	counsel(.2); handle funding and payment of demolition (.2).				
06/28/2024	Call with demolition company and contractors regarding hydroseed and permitting issues.	PFV	0.50	\$550.00	\$275.00
06/28/2024	Call with R. Santiago regarding status of service of process.	PFV	0.20	\$550.00	\$110.00
06/28/2024	Call with M. Damian regarding loan and status and planning.	PFV	0.20	\$550.00	\$110.00
07/01/2024	Correspondence with R. Kenol regarding opening an estate of Cardinal Andrews.	RPS	0.30	\$450.00	\$135.00
07/05/2024	Email regarding request for Prestige documents from counsel in insurance defended case.	PFV	0.20	\$550.00	\$110.00
07/09/2024	Attend hearing on joint motion of counsel for Forty Year Investment, LLC to withdraw as counsel.	JS	0.80	\$295.00	\$236.00
07/09/2024	Draft email to process server regarding status of service; (.1); revision of copy for publication and revisions; (.3); draft affidavit of diligence in connection with Flores defendants and revisions; (.8).	RPS	1.20	\$450.00	\$540.00
07/09/2024	Draft email to R. Kenol regarding opening an estate of Mr. Andrews.	RPS	0.20	\$450.00	\$90.00
07/11/2024	(No charge) Review order of withdrawal as attorney of record as to Forty Year Investment, LLC.	JS	0.10	\$0.00	\$0.00
07/11/2024	Meeting with P. Valori and R. Santiago on advancing service and partition action (.4); emails regarding financing (.3).	MME	0.70	\$550.00	\$385.00
07/11/2024	Conferences and review email regarding status of service of process and motion for summary judgment.	PFV	0.40	\$550.00	\$220.00
07/11/2024	Email regarding seed spreading at property regarding past demolition work.	PFV	0.10	\$550.00	\$55.00
07/11/2024	Review order regarding status conference.	PFV	0.10	\$550.00	\$55.00
07/12/2024	Legal research regarding methods to foreclose property interests in partition proceedings expanded nationally and extent of court's power in connection with same; (4.3); work on draft proposed summary judgment order and revisions; (1.8); correspondence regarding draft summary judgment motion (.2); review of two additional affidavits of diligent search and revisions (.5); correspondence with Miami New Times regarding quote for publications (.1); legal research regarding publication requirements for trust entities (.7)	RPS	7.60	\$450.00	\$3,420.00
07/15/2024	Work on summary judgment motion (2.1); review file in connection with same (1.6); research regarding partition statute and foreclose of property interests	RPS	6.10	\$450.00	\$2,745.00

	through partition and work on identifying exhibits to motion (2.4).				
07/15/2024	[Israel Lopez-Morillo]: Research regarding required notice of constructive service	pl	1.00	\$150.00	\$150.00
07/15/2024	[Israel Lopez-Morillo]: Contacting newspaper to handle notice of publication of service.	pl	0.50	\$150.00	\$75.00
07/16/2024	Reviewing status of constructive service and approving ad expense and notice.	MME	0.50	\$550.00	\$275.00
07/16/2024	Work on proposed summary judgment order (1.4); legal research on methods for foreclosing interests (1.8); work on exhibit regarding security interests and pay out balances of same (3.4).	RPS	6.60	\$450.00	\$2,970.00
07/16/2024	[Israel Lopez-Morillo]: Locate newspapers which qualify for publication of service.	pl	0.50	\$150.00	\$75.00
07/16/2024	[Israel Lopez-Morillo]: Negotiating regarding notice of publication of service.	pl	0.50	\$150.00	\$75.00
07/17/2024	Review proposed publication notice and revise same.	PFV	0.20	\$550.00	\$110.00
07/17/2024	Email regarding summary judgment content as to mortgage and lienholder information.	PFV	0.20	\$550.00	\$110.00
07/17/2024	Email regarding status and planning as to lienholder spreadsheet.	PFV	0.10	\$550.00	\$55.00
07/17/2024	Work on affidavits of diligent search in connection with constructive service of process. Revisions to affidavits.	RPS	1.70	\$450.00	\$765.00
07/17/2024	Review lienholder spreadsheet and revisions to same (2.3); review copy for service by publication and revisions to same (.3).	RPS	2.60	\$450.00	\$1,170.00
07/17/2024	Research in connection with opposition to motion to intervene.	RPS	2.10	\$450.00	\$945.00
07/17/2024	[Israel Lopez-Morillo]: Work on publication for constructive service of process.	pl	1.50	\$150.00	\$225.00
07/18/2024	Additional work on proposed summary judgment orders (.6); document review for compilation of property interests and methodology of disbursing funds (2.6).	RPS	3.20	\$450.00	\$1,440.00
07/19/2024	Work on opposition to motion to intervene.	RPS	3.40	\$450.00	\$1,530.00
07/22/2024	Work on the Receiver's Sixth Status Report.	JS	1.10	\$295.00	\$324.50
07/24/2024	Conference with P. Valori and R. Santiago regarding motion to intervene, lack of standing, and movants' contingent interest.	JS	0.20	\$295.00	\$59.00
07/24/2024	Update response in opposition to motion to intervene.	JS	0.20	\$295.00	\$59.00

07/24/2024	Email correspondence with S. Goldberg regarding interrogatories.	JS	0.10	\$295.00	\$29.50
07/24/2024	Conferences regarding status and planning as to title related issues, motion for summary judgment, service of process, estate of Andrews, and opposition to motion to intervene.	PFV	0.90	\$550.00	\$495.00
07/26/2024	Update research regarding the tenant's inability to sue for prejudgment attachment.	JS	1.80	\$295.00	\$531.00
07/28/2024	Review email regarding Cardinal Andrews estate case.	PFV	0.10	\$550.00	\$55.00
07/30/2024	Continue working on the Receiver's Sixth Status Report.	JS	0.40	\$295.00	\$118.00
07/30/2024	Review draft response to interrogatories in renter class case regarding request by insurance defense counsel for assistance in completing discovery responses.	PFV	0.40	\$550.00	\$220.00
07/30/2024	Email from class counsel in owner class regarding status of proposed settlement agreement and proposed administrator position and draft email to receiver regarding same.	PFV	0.20	\$550.00	\$110.00
07/30/2024	Email regarding owner meeting.	PFV	0.10	\$550.00	\$55.00
07/30/2024	(No charge) Conference regarding extension of time to complete service.	PFV	0.10	\$0.00	\$0.00
07/30/2024	Review proposed retainer regarding probate counsel as to Cardinal Andrews estate.	PFV	0.10	\$550.00	\$55.00
07/30/2024	Draft email regarding same.	PFV	0.10	\$550.00	\$55.00
07/30/2024	Work on proposed interrogatory response in renter class case.	PFV	0.90	\$550.00	\$495.00
07/30/2024	[Israel Lopez-Morillo]: (No charge) Quote and proof for two new publication notices.	pl	0.50	\$0.00	\$0.00
07/31/2024	Continue working on response in opposition to motion to intervene.	JS	0.20	\$295.00	\$59.00
07/31/2024	Work on response to Plaintiff's interrogatories in renter class case.	PFV	0.40	\$550.00	\$220.00
07/31/2024	(No charge) Review motion for extension of time to serve process based on the death of Mr. Andrews et. al.	PFV	0.20	\$0.00	\$0.00

**Hours Subtotal 138.3**

**Fees Subtotal \$53,857.00**

**Expenses**

Type	Date	Description	Quantity	Rate	Amount
Expense	05/06/2024	Postage	1.00	\$0.64	\$0.64
Expense	05/31/2024	Photocopies	344.00	\$0.25	\$86.00
Expense	05/31/2024	Lexis Nexis Research Fee	1.00	\$139.00	\$139.00
Expense	06/01/2024	OTR legal Process. Invoice 2024000286. Summons to be served on Cordell L. Black. additional addresses, Rush, copies, skip trace. 06.01.24	1.00	\$407.00	\$407.00
Expense	06/14/2024	OTR Legal process. Invoice 2024000287. Skip Trace for Claude Cooper/Affidavit of due diligent search and inquiry. 06.14.24	1.00	\$195.00	\$195.00
Expense	06/14/2024	OTR Legal Process. Invoice 2024000288. Skip Trace for Ira D. Cohen Family Trust/Affidavit of due diligent search and inquiry. 06.14.24	1.00	\$195.00	\$195.00
Expense	06/14/2024	OTR Legal Process. Invoice 2024000289. Skip Trace for Joye Antoinette Green/Affidavit of Due diligent search and inquiry. 06.14.24	1.00	\$195.00	\$195.00
Expense	06/14/2024	OTR Legal Process. Invoice 2024000290. Skip Trace for beneficial Florida , Inc./ Affidavit of due diligent search and inquiry. 06.14.24	1.00	\$195.00	\$195.00
Expense	06/14/2024	OTR Legal Process. Invoice 2024000291. Skip Trace for Good Deeds Capital , LLC/ Affidavit due diligent search and inquiry. 06.14.24	1.00	\$195.00	\$195.00
Expense	06/28/2024	Loan to Receivership for final payment to Demolition Gods, Insurance premium and other association expenses	1.00	\$111,000.00	\$111,000.00
Expense	06/30/2024	Webmaster. Post demolition notice to home page and other information regarding important dates on March, hosting and renewal for Apr, May and June.	1.00	\$77.85	\$77.85
Expense	06/30/2024	Photocopies	106.00	\$0.25	\$26.50
Expense	06/30/2024	Lexis Nexis Research Fee	1.00	\$40.25	\$40.25
Expense	07/01/2024	OTR Legal. Invoice #2024000026. Summons to be served on Nerilanda Destave. 3/7/24.	1.00	\$55.00	\$55.00
Expense	07/12/2024	OTR Legal Process. Invoice 2024000299. Summons to be served on Flora M. Ramirez. Additional address, skip trace. Non-served. 07.12.24	1.00	\$555.00	\$555.00
Expense	07/18/2024	Miami New Times. Service by publication. 07.18.24	1.00	\$3,132.00	\$3,132.00
Expense	07/31/2024	Photocopies	18.00	\$0.25	\$4.50

Expense	07/31/2024	Lexis Nexis Research Fee	1.00	\$62.89	\$62.89
Expense	07/31/2024	Miami New Times. Service by publication. 7.31.24	1.00	\$1,548.00	\$1,548.00
Expense	07/31/2024	Interest on loan	1.00	\$890.29	\$890.29
				<b>Expenses Subtotal</b>	<b>\$118,999.92</b>

Name	Hours	Rate	Amount	
Melanie Damian	3.7	\$550.00	\$2,035.00	
Kenneth Murena	0.2	\$525.00	\$105.00	
Law Clerk/ Paralegal	4.0	\$150.00	\$600.00	
Law Clerk/ Paralegal	0.5	\$0.00	\$0.00	
Robert Santiago	60.4	\$450.00	\$27,180.00	
Robert Santiago	3.6	\$0.00	\$0.00	
Joseph Seara	31.6	\$295.00	\$9,322.00	
Joseph Seara	0.5	\$0.00	\$0.00	
Peter Valori	25.1	\$550.00	\$13,805.00	
Peter Valori	0.3	\$0.00	\$0.00	
Reesea Saetae	8.1	\$100.00	\$810.00	
Reesea Saetae	0.3	\$0.00	\$0.00	
			<b>Hours Total</b>	<b>138.3</b>
			<b>Subtotal</b>	<b>\$172,856.92</b>
			<b>Amount</b>	<b>\$172,856.92</b>

**Statement of Account**

Outstanding Balance	New Charges	Payments Received	<b>Total Amount Outstanding</b>
( \$329,947.20	+ \$172,856.92	) - ( \$0.00	) = <b>\$502,804.12</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
63	12/31/2023	\$267,345.48	\$0.00	\$267,345.48
242	01/31/2024	\$28,262.38	\$0.00	\$28,262.38
948	04/30/2024	\$34,339.34	\$0.00	\$34,339.34

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
949	07/31/2024	\$172,856.92	\$0.00	\$172,856.92
<b>Outstanding Balance</b>				<b>\$502,804.12</b>
<b>Total Amount Outstanding</b>				<b>\$502,804.12</b>

Please make all amounts payable to: Damian Valori Culmo

LawPay link: <https://secure.lawpay.com/pages/damianandvalori/operating-2>

Payment is due upon receipt.

# **COMPOSITE EXHIBIT 3**



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

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

May 25, 2024  
Invoice Number 113325

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

PROFESSIONAL SERVICES

Hours

04/26/24	RMZ	Review Affidavit for Morel, Unit 129.	0.20
05/01/24	IC	Review Morel affidavit - correspondence to Gabriela re: notarized affidavit.	0.50
05/09/24	IC	Forward Morel affidavit for recording	0.20
05/13/24	IC	Review email regarding Unit 245. Review Title Commitment. Correspondence to Gabriela re Satisfaction of Mortgage.	0.50
05/14/24	RMZ	Telephone call with Joseph Seara, Esq. regarding default final judgments-Elite Innovation.	0.20

May 25, 2024

Invoice 113325

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

05/15/24	RMZ	Review draft final default judgment; telephone call with Joseph Seara, Esq. (2); review title, mortgage, assignment and correspondence regarding Unit 245; telephone call with Deb Ullman, Esq. of the Fund.	1.20	
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		TOTAL HOURS AND FEES	2.80	942.00
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DISBURSEMENTS

05/08/24		Recording Fees		20.42
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		TOTAL COST		20.42
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		TOTAL STATEMENT		962.42
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<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	1.60	792.00
Iris Castillo	1.20	150.00
Total Fees	2.80	942.00

04/25/24	PREVIOUS BALANCE	3,909.10
	Total this Bill	962.42
	<u>NEW BALANCE</u>	<u>4,871.52</u>

Accounts Receivable Aging	
Current	962.42
30 Days	2,025.00
60 Days	1,435.50
90 Days	448.60
120 Days	0.00

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

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

June 25, 2024  
Invoice Number 113346

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

PROFFESIONAL SERVICES

			Hours
05/30/24	RMZ	Review correspondence from Reesea, et al; review related title searches, Affidavits.	0.40
05/31/24	RMZ	Telephone call with Peter Valori, Esq; Robert Santiago, Esq. and Gabriela and Iris Castillo regarding curative procedures; conference with Iris Castillo; conference with Iris Castillo and Jennifer Zelman.	2.00
06/07/24	RMZ	Review County Liens; conference with Iris Castillo; prepare correspondence to Miami-Dade County.	0.40
06/07/24	IC	Review County liens, conference with Richard Zelman.	0.20

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

06/11/24	JEZ	Revise Mortgages regarding payoff letters; review commitment; check files for Affidavits and Satisfactions; review Judgments.	3.00	
06/12/24	JEZ	Review files regarding judgments.	2.00	
06/14/24	JEZ	Preparation of correspondence requesting personal information required to obtain payoff letters.	2.50	
06/19/24	JEZ	Telephone calls with Unit Owners regarding payoff information.	2.00	
06/19/24	RMZ	Telephone call with Iris and Jennifer Zelman regarding correspondence to Unit Owners and mortgages.	0.20	
06/20/24	JEZ	Telephone calls with banking institutions-re requirements to obtain payoff letters.	3.00	
06/25/24	RMZ	Telephone call with Iris Castillo.	0.20	
		TOTAL HOURS AND FEES	15.90	3,171.50
		DISBURSEMENTS		
01/11/24		Court webpay		6.00
06/12/24		Credit and Collection Section		75.00
		TOTAL COST		81.00
		TOTAL STATEMENT		3,252.50

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Jennifer E. Zelman	12.50	1,562.50
Richard M. Zelman	3.20	1,584.00
Iris Castillo	0.20	25.00
<b>Total Fees</b>	<b>15.90</b>	<b>3,171.50</b>

05/25/24	PREVIOUS BALANCE	4,871.52
	Total this Bill	3,252.50
	<u>NEW BALANCE</u>	<u>8,124.02</u>

Accounts Receivable Aging

Current	3,252.50
30 Days	962.42
60 Days	2,025.00
90 Days	1,435.50
120 Days	448.60

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July 25, 2024  
Invoice Number 113396

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

PROFFESIONAL SERVICES

			Hours
07/15/24	IC	Preparation of additional Non-Id Affidavits; correspondence to Unit owners; telephone call with Louis J. Baptiste of Unit 131 explaining the purpose of the Affidavit; telephone call with Herbert Touzallin of Unit 125/126 explaining the purpose of the Affidavit.	5.00
07/18/24	RMZ	Telephone call with Iris Castillo; telephone call with Brian Stringer, Esq. of the Fund.	0.50
07/23/24	RMZ	Telephone call with Brian Stringer of the Fund; telephone call with Iris Castillo; review Units 125-6 correspondence.	0.40

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

07/24/24 RMZ Telephone call with Iris Castillo 1.60  
 regarding mortgages and judgments;  
 telephone conference with Iris  
 Castillo, Peter and Robert regarding  
 title insurance and cleaning title.

07/24/24 IC Review judgment creditor search; 3.50  
 review mortgage payoff status;  
 preparation of updated list re  
 creditors; conference call with  
 Richard M. Zelman, Esq., and Peter  
 Valori, Esq; telephone conversation  
 with Herbert Touzallin, owner of  
 Units 125/126 regarding Affidavit.

TOTAL HOURS AND FEES 11.00 2,300.00

TOTAL STATEMENT 2,300.00

<u>Fee Summary</u>	<u>Hours</u>	<u>Amount</u>
Richard M. Zelman	2.50	1,237.50
Iris Castillo	8.50	1,062.50
<b>Total Fees</b>	<b>11.00</b>	<b>2,300.00</b>

06/25/24	PREVIOUS BALANCE	8,124.02
	Total this Bill	2,300.00
	<u>NEW BALANCE</u>	<u>10,424.02</u>

<b>Accounts Receivable Aging</b>	
Current	2,300.00
30 Days	3,252.50
60 Days	962.42
90 Days	2,025.00
120 Days	1,884.10

# **EXHIBIT 4**



IN THE CIRCUIT COURT FOR THE 11<sup>TH</sup>  
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.

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**[PROPOSED] ORDER GRANTING RECEIVER'S APPLICATION  
FOR ORDER AUTHORIZING PAYMENT OF FEES AND  
EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE FUNDS [D.E.53]**

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 \$8,005.00 for the period from May 1, 2024, to July 31, 2024;
- (b) Damian | Valori | Culmo, as Lead Counsel to the Receiver, incurred fees in the amount of \$53,857.00 and costs in the amount of \$118,999.92, for a total of \$172,856.92 for the period from May 1, 2024, to July 31, 2024; and
- (c) Sacher Zelman Harman, P.A., as Special Counsel to the Receiver, incurred fees in the amount of \$6,413.50 and costs in the amount of \$101.42, for a total of \$6,514.92 for the period from April 26, 2024, to July 31, 2024.

3. The Receiver is authorized to use funds in account(s) of the New World Condominium Apartments Condominium Association, Inc. to pay the fees and costs in 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 \_\_\_\_\_, 2024.

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CIRCUIT COURT JUDGE

Copies to all Counsel of Record