

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION**

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

CASE NO.: 50-2021-CA-008718-XXXX-MB

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ,
MARSHAL SEEMAN,
CENTURION INSURANCE SERVICES
GROUP, LLC, BRIAN J. SCHWARTZ,
EMERALD ASSETS 2018, LLC,
INTEGRITY ASSETS 2016, LLC,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
PARA LONGEVITY 2015-3, LLC,
PARA LONGEVITY 2015-5, LLC,
PARA LONGEVITY 2016-3, LLC,
PARA LONGEVITY 2016-5, LLC,
PARA LONGEVITY 2018-3, LLC,
PARA LONGEVITY 2018-5, LLC,
PARA LONGEVITY 2019-3, LLC,
PARA LONGEVITY 2019-5, LLC,
PARA LONGEVITY 2019-6, LLC,
PARA LONGEVITY VI, LLC,
SH GLOBAL, LLC N/K/A PARA
LONGEVITY V, LLC, ALTRAI GLOBAL,
LLC A/K/A ALTRAI HOLDINGS, LLC,
VALENTINO GLOBAL HOLDINGS, LLC,
AMERITONIAN ENTERPRISES, LLC,
SEEMAN-HOLTZ CONSULTING CORP.,
CENTURION ISG Holdings, LLC,
CENTURION ISG Holdings II, LLC,
CENTURION ISG (Europe) Limited,
CENTURION ISG SERVICES, LLC,
CENTURION ISG FINANCE GROUP, LLC,
CENTURION FUNDING SPV I LLC,
CENTURION FUNDING SPV II LLC,
GRACE HOLDINGS FINANCIAL, LLC,
PRIME SHORT TERM CREDIT INC.,

Defendants.

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY,
INC., SHPC HOLDINGS I, LLC,

Relief Defendants.

NOTICE OF FILING

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”), by and through undersigned counsel, hereby gives notice of and files a copy of the Stipulation of Dismissal without Prejudice (the “Dismissal”) entered in the Federal action *Fanny B. Millstein v. Marshall Seeman, et al.*, U.S. District Court Case No. 21-cv-61179-RAR. The Dismissal dismisses the entities subject of the Corporate Monitor’s authority from the Federal action commenced prior to the appointment of the Corporate Monitor. A true and correct copy of the Dismissal is attached hereto as **Exhibit “A”**.

DATED: October 7, 2021

BERGER SINGERMAN LLP
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By: /s/ Gavin C. Gaukroger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 7, 2021, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties.

By: /s/ Gavin C. Gaukroger
Gavin C. Gaukroger

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

Case Number: 21-CV-61179-RAR

**FANNY B. MILLSTEIN, on behalf
of herself and all others similarly situated,**

Plaintiff,

v.

**MARSHAL SEEMAN, NATIONAL
SENIOR INSURANCE, INC., a Florida
corporation d/b/a SEEMAN HOLTZ,
CENTURION INSURANCE SERVICES
GROUP, LLC, an Ohio limited liability
company, BRIAN J. SCHWARTZ, PARA
LONGEVITY HOLDINGS VI, LLC, a
Georgia limited liability company,
EMERALD ASSETS HOLDINGS, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2014-5, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2015-3, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2015-5, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2016-3, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2016-5, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2018-3, LLC, a
Georgia limited liability company,
PARA LONGEVITY 2018-5, LLC, a
Georgia limited liability company, PARA
LONGEVITY 2019-3, LLC, a Georgia
limited liability company, PARA
LONGEVITY 2019-5, LLC, a Georgia
limited liability company, PARA
LONGEVITY 2019-6, LLC, a Georgia
limited liability company,
EMERALD ASSETS 2018, LLC, a Georgia
limited liability company, INTEGRITY
ASSETS 2016, LLC, a Georgia limited**



liability company, INTEGRITY ASSETS, LLC, a Georgia limited liability company, SH GLOBAL, LLC n/k/a PARA LONGEVITY V, LLC, a Georgia limited liability company, ALTRAI GLOBAL, LLC a/k/a ALTRAI HOLDINGS, LLC, a Delaware limited liability company, VALENTINO GLOBAL HOLDINGS, LLC, a Delaware limited liability company, AMERITONIAN ENTERPRISES, LLC, a Delaware limited liability company, SEEMAN-HOLTZ CONSULTING CORP., a Florida corporation, CENTURION ISG HOLDINGS, LLC, a Delaware limited liability company, CENTURION ISG HOLDINGS II, LLC, a Delaware limited liability company, CENTURION ISG (EUROPE) LIMITED, an entity formed under the laws of Ireland, CENTURION ISG SERVICES, LLC, a Delaware limited liability company, CENTURION ISG FINANCE GROUP, LLC, a Delaware limited liability company, CENTURION FUNDING SPV I, LLC, a Delaware limited liability company, CENTURION FUNDING SPV II, LLC, a Delaware limited liability company, SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC f/k/a SEEMAN HOLTZ PROPERTY CASUALTY, INC., a Delaware limited liability company, SHPC HOLDINGS I, LLC, a Delaware limited liability company,

Defendants,

**THE ESTATE OF ERIC CHARLES
HOLTZ,**

Relief Defendant.

STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Plaintiff Fanny B. Milstein, on behalf of herself and all those similarly situated, and Daniel J. Stermer, the Corporate Monitor appointed by the Circuit Court of the Fifteenth Judicial

Circuit in and for Palm Beach County, through its Agreed Order Granting Plaintiff's Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief ("Appointment Order"), for and on behalf of the Defendants for whom he was appointed Corporate Monitor, hereby stipulate and agree that, with regard to the following Defendants only:

NATIONAL SENIOR INSURANCE, INC., a Florida corporation d/b/a SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, an Ohio limited liability company, PARA LONGEVITY HOLDINGS VI, LLC, a Georgia limited liability company, PARA LONGEVITY 2014-5, LLC, a Georgia limited liability company, PARA LONGEVITY 2015-3, LLC, a Georgia limited liability company, PARA LONGEVITY 2015-5, LLC, a Georgia limited liability company, PARA LONGEVITY 2016-3, LLC, a Georgia limited liability company, PARA LONGEVITY 2016-5, LLC, a Georgia limited liability company, PARA LONGEVITY 2018-3, LLC, a Georgia limited liability company, PARA LONGEVITY 2018-5, LLC, a Georgia limited liability company, PARA LONGEVITY 2019-3, LLC, a Georgia limited liability company, PARA LONGEVITY 2019-5, LLC, a Georgia limited liability company, PARA LONGEVITY 2019-6, LLC, a Georgia limited liability company, EMERALD ASSETS 2018, LLC, a Georgia limited liability company, INTEGRITY ASSETS 2016, LLC, a Georgia limited liability company, INTEGRITY ASSETS, LLC, a Georgia limited liability company, SH GLOBAL, LLC n/k/a PARA LONGEVITY V, LLC, a Georgia limited liability company, VALENTINO GLOBAL HOLDINGS, LLC, a Delaware limited liability company, AMERITONIAN ENTERPRISES, LLC, a Delaware limited liability company, SEEMAN-HOLTZ CONSULTING CORP., a Florida corporation, CENTURION ISG HOLDINGS, LLC, a Delaware limited liability company, CENTURION ISG HOLDINGS II, LLC, a Delaware limited liability company, CENTURION ISG (EUROPE) LIMITED, an entity formed under the laws of Ireland, CENTURION ISG SERVICES, LLC, a Delaware limited liability company, CENTURION ISG FINANCE GROUP, LLC, a Delaware limited liability company, CENTURION FUNDING SPV I, LLC, a Delaware limited liability company, CENTURION FUNDING SPV II, LLC, a Delaware limited liability company,

that this matter is dismissed as to them without prejudice, with each side to bear its own fees and costs, for the reasons set forth more fully in the Tolling Agreement entered into contemporaneously with this Stipulation and filed with this Court. This matter is not dismissed

and shall continue as to Defendants Marshal Seeman, the Estate of Eric Charles Holtz, and Brian J. Schwartz.

IN WITNESS WHEREOF, the Parties have executed this Stipulation of Dismissal Without Prejudice on this 6th day of October, 2021.

For Daniel J. Sterner, as the Corporate Monitor

For Plaintiff Fanny B. Millstein

By:  CORPORATE MONITOR

By: 

Name: DANIEL J. STERNER

Name: David Buckner

Title: CORPORATE MONITOR 10/1/21

Title: Attorney for Plaintiff



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 6, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: s/ David M. Buckner
David M. Buckner, Esq.
Fla. Bar: 60550
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