

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

CASE NO.: 50-2021-CA-008718

STATE OF FLORIDA  
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

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,  
INTEGRITY 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 k/n/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 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.

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**VERIFIED MOTION FOR ADMISSION TO APPEAR PRO HAC VICE  
PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

COMES NOW, Adam J. Ruttenberg, Movant herein, and respectfully represents the following:

1. Movant resides in Massachusetts and is not a resident of the State of Florida.
2. Movant is an attorney and member of the law firm of Arent Fox Schiff, LLP, with offices at 800 Boylston Street, 32nd Floor, Boston, Massachusetts 02199; telephone number (617) 973-6279.
3. Movant has been retained as an attorney with the above-named law firm on July 23, 2021, to represent proposed Intervenor, Pelican Capital Management, LLC, and to provide legal representation in connection with the above-styled matter now pending before the above-named court in the State of Florida.
4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions:
  - Massachusetts Board of Bar Overseers No. 553158
5. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against Movant in the preceding five years.
6. Movant, either by resignation, withdrawal, or otherwise, has never terminated or

attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

7. Movant is not an inactive member of The Florida Bar.

8. Movant is not now a member of The Florida Bar.

9. Movant is not a suspended member of The Florida Bar.

10. Movant is not a disbarred member of The Florida Bar nor has Movant received disciplinary resignation or disciplinary revocation from The Florida Bar.

11. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida rule of Judicial Administration 2.510.

12. Movant has not filed any motion to appear as counsel in Florida state courts during the past five (5) years.

13. Local counsel of record associated with Movant in this matter is Angela C. Flowers (Florida Bar No.: 510408), who is an active member in good standing of The Florida Bar and has an office at 1396 N.E. 20th Avenue, Building 500, Ocala, Florida 34470; Telephone No.: (352) 622-4222.


14. Movant has read the applicable provisions of the Florida Rule of Judicial Administration 2.510 and rule 1-3.10 of the Rules Regulating the Florida Bar and certifies that this verified motion complies with those rules.

15. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.


DATED this 1<sup>st</sup> day of June, 2022.

ARENT FOX SCHIFF, LLP

  
\_\_\_\_\_  
Adam J. Ruttenberg  
800 Boylston Street, 32nd Floor  
Boston, MA 02199  
Telephone (617) 973-6279  
E-Mail: adam.ruttenberg@afslaw.com

STATE OF Massachusetts  
COUNTY OF Suffolk

I, Adam J. Ruttenberg, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents therefore, and the contents are true of my own knowledge and belief.

  
\_\_\_\_\_  
Adam J. Ruttenberg

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED this 7<sup>th</sup> day of June, 2022.

  
\_\_\_\_\_  
Angela C. Flowers  
Florida Bar No.: 510408  
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**CERTIFICATE OF SERVICE**

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I HEREBY CERTIFY that on June 7<sup>th</sup>, 2022, a true and correct copy of the foregoing was served by U.S. mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333, served electronically through the Florida Court's E-Filing Portal upon all registered users, and served by U.S. mail to non-registered users listed in the Service List below.

By: Angela C. Flowers  
Angela C. Flowers  
Florida Bar No.: 510408

## SERVICE LIST

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