

**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 AFFIDAVIT IN SUPPORT OF BERGER SINGERMAN LLP'S
FIRST INTERIM MOTION FOR COMPENSATION FOR PROFESSIONAL
SERVICES AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM SEPTEMBER 14, 2021 THROUGH JULY 31, 2022**

Daniel J. Stermer, as Court-appointed Corporate Monitor (the “Corporate Monitor”) for the property, assets and business of the thirty-two (32) corporate-entities¹, by and through undersigned counsel, hereby files the attached *Affidavit in Support of Berger Singerman LLP's First Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From September 14, 2021 Through July 31, 2022* dated October 31,

¹ The Consenting Corporate Defendants include: NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, 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, 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, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC., AGENCY ACQUISITION FUNDING, LLC, and AMERICA'S FAVORITE INSURANCE SERVICES LLC.

2022.

DATED: November 7 2022

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for Corporate Monitor
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Telephone: (561) 241-9500
Facsimile: (561) 998-0028

By: /s/ Brian G. Rich

Brian G. Rich
Florida Bar No. 38229
brich@bergersingerman.com
Gavin C. Gaukroger
Florida Bar No. 76489
ggaukroger@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
mniles@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 2022, 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. I further certify that a true and correct copy of the foregoing was served by electronic transmission upon all parties on the attached Service List.

By: /s/ Brian G. Rich
Brian G. Rich

SERVICE LIST

<p>A. Gregory Melchior, Esq., Chief Counsel George C. Bedell, III, Esq., Chief Counsel <i>Office of General Counsel</i> <i>Florida Office of Financial Regulation</i> 200 East Gaines Street Tallahassee, FL 32309 Greg.Melchior@flofr.gov George.Bedell@flofr.gov Sharon.Sutor@flofr.gov <i>Counsel for Plaintiff</i></p>	<p>Scott Alan Orth, Esq. <i>Law Offices of Scott Alan Orth</i> 3860 Sheridan Street, Ste. A Hollywood, FL 33021 scott@orthlawoffice.com service@orthlawoffice.com eserviceSAO@gmail.com <i>Attorney for Defendant Marshal Seeman, Twenty-six Defendant Entities</i></p>
<p>Jeffrey H. Sloman, Esq. <i>Stumphauzer Foslid Sloman & Kolaya, PLLC</i> One Biscayne Tower 2 South Biscayne Boulevard, Suite 1600 Miami, FL 33131 jsloman@sfslaw.com <i>Attorneys for Defendants Brian J. Schwartz and Ameritonian Enterprises, LLC</i></p>	<p>Daniel J. Stermer, Esq. <i>Development Specialists, Inc.</i> 500 W. Cypress Creek Road, Suite 400 Fort Lauderdale, Florida 33309 dsterner@DSIConsulting.com <i>Corporate Monitor</i></p>
<p>Gary A. Woodfield, Esq. <i>Nason Yeager Gerson Harris & Fumero, P.A.</i> 3001 PGA Boulevard, Suite 305 Palm Beach Gardens, FL 33410 syoffee@nasonyeager.com gwoodfield@nasonyeager.com <i>Counsel for The Estate of Eric Charles Holtz</i></p>	<p>Victoria R. Morris, Esq. Andrew C. Lourie, Esq. Kobre & Kim LLP 201 South Biscayne Boulevard, Suite 1900 Miami, FL 33131 Andrew.Lourie@kobrekim.com Victoria.Morris@kobrekim.com <i>Attorneys for Relief Defendant Seeman Holtz Property and Casualty LLC</i></p>
<p>David L. Luikart III, Esq. Hill, Ward & Henderson, P.A. 101 East Kennedy Boulevard, Suite 3700 Tampa, FL 33602 Dave.luikart@hwlaw.com Michelle.armstrong@hwlaw.com <i>Attorneys for Prime Short Term Credit, Inc.</i></p>	<p>Joshua W. Dobin, Esq. James C. Moon, Esq. Meland Budwick, P.A. 3200 Southeast Financial Center 200 South Biscayne Boulevard Miami, FL 33131 jdobin@melandbudwick.com jmoon@melandbudwick.com mramos@melandbudwick.com <i>Attorneys for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC</i></p>

<p>Bernard Charles Carollo, Jr., Esq. John J. Truitt, Esq. William Leve, Esq. Vernon Litigation Group 8985 Fontana Del Sol Way Naples, FL 34109 bcarollo@vernonlitigation.com jtruitt@vernonlitigation.com wleve@vernonlitigation.com nzumaeta@vernonlitigation.com <i>Attorneys for Edwin and Karen Ezrine, Intervenors And Tom Echolds, Interested Party</i></p>	<p>Gary M. Murphree, Esq. Brandy Abreu, Esq. AM Law, LC 10743 SW 104th Street Miami, FL 33186 gmm@amlaw-miami.com babreu@amlaw-miami.com mramirez@amlaw-miami.com pleadings@amlaw-miami.com <i>Attorneys for Zoe Seijas and Victor Seijas, Jr., Trustees of Victor Seijas Living Trust</i></p>
<p>Harris J. Koroglu, Esq. Shutts & Bowen LLP 200 South Biscayne Boulevard, Suite 4100 Miami, FL 33131 hkoroglu@shutts.com <i>Attorneys for MCM 301 Yamato LLC</i></p>	<p>Angela C. Flowers, Esq. Kubicki Draper 13906 N.E. 20th Avenue, Building 500 Ocala, FL 34470 Af-kd@kubickidraper.com <i>Attorneys for Pelican Capital Management, LLC</i></p>
<p>Adam J. Ruttenberg, Esq. Argent Fox Schiff, LLP 800 Boylston Street, 32nd Floor Boston, MA 02199 Adam.ruttenberg@afslaw.com <i>Attorney for Pelican Capital Management, LLC</i></p>	

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THE ESTATE OF ERIC CHARLES HOLTZ,
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Relief Defendants.

_____ /

**AFFIDAVIT IN SUPPORT OF BERGER SINGERMAN LLP’S FIRST INTERIM
 MOTION FOR COMPENSATION FOR PROFESSIONAL SERVICES AND
 REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
SEPTEMBER 14, 2021 THROUGH JULY 31, 2022**

STATE OF FLORIDA)
) ss:
 COUNTY OF MIAMI-DADE)

BEFORE ME, this date, personally appeared Glenn D. Moses, who being first duly sworn, deposes and says:

1. My name is Glenn D. Moses. I am over the age of 18 and competent to testify.
2. I am a shareholder with Genovese Joblove & Battista, P.A., with offices located in Miami, Fort Lauderdale and Tampa, Florida. I have been practicing law for 30 years, with a focus on insolvency, restructuring and related commercial litigation. I am a member in good standing of the Florida Bar.
3. With respect to the legal services rendered in this action, I am familiar with the issues involved, the time and labor required, the novelty and difficulty of the questions involved, the skills required to perform those legal services properly, and the fee customarily charged for similar legal services.
4. In order to render an opinion as to the hourly rates charged and the reasonableness of the hours expended by Berger Singerman LLP, as counsel for the Corporate Monitor, Daniel J. Stermer (the “Corporate Monitor”), I have reviewed counsel’s time entries, pleadings, and papers filed in this matter

5. I am familiar with Rule 4-1.5(b) of the Rules Regulating the Florida Bar, and have taken into consideration the factors set forth in such Rule for the determination of reasonable attorneys' fees.

6. In arriving at my opinion of the reasonableness of the attorneys' fees charged in this action, I have considered the following criteria:

a. The time and labor required, the novelty, complexity and difficulty of the questions involved, and the skill requisite to perform the legal service properly.

b. The likelihood that the acceptance of the particular employment will preclude other employment by the lawyer.

c. The fee, or rate of fee, customarily charged in this locality for legal services of a comparable or a similar nature.

d. The significance of, or amount involved in, the subject matter of the representation, the responsibility involved in the representation, and the results obtained.

7. Based upon the foregoing, it is my opinion that the fees totaling \$767,391.00 and costs in the amount of \$8,666.76 sought through *Berger Singerman LLP's First Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From September 14, 2021 Through July 31, 2022* (the "Fee Motion") are fair and reasonable considering each and every factor contemplated by *Florida Patient's Compensation Fund v. Rowe*, 472 So. 2d 1145 (Fla. 1985) and the principles of *Lewis v. Gramil Corp.*, 94 So. 2d 174, 177 (Fla. 1957). The 1,603.90 hours worked by Berger Singerman LLP are fair and reasonable. The hourly rates in the Fee Motion are reasonable. I base that opinion on, among other things, the significant skill and knowledge necessary to successfully administer this monitorship estate and a review of the records. I also take note that Berger Singerman LLP has voluntarily reduced its fee request by \$194,220.50, further supporting the reasonableness of the Fee Motion. The services rendered by Berger Singerman LLP

have substantially benefited the Corporate Monitor and the monitorship estate.

8. I have no interest in the outcome of this litigation and I am not associated with or employed by any party to this action or by the attorneys involved in this matter.

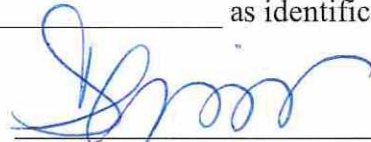
FURTHER AFFIANT SAYETH NAUGHT.



Glenn D. Moses, Esq.
Florida Bar No. 174556

STATE OF FLORIDA)
) ss:
COUNTY OF MIAMI-DADE)

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 31st day of October, 2022, by Glenn D. Moses who is personally known to me or who has produced _____ as identification.



Notary Public, State of Florida
My Commission Expires:

