

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.

MOTION TO WITHDRAW AS ATTORNEYS OF RECORD

The law firm of Kubicki Draper and Angela C. Flowers, Esquire, and the law firm of ArentFox Schiff and Adam J. Ruttenberg, Esquire, pursuant to Rule 2.505(f), Fla. R. Gen. Prac. & Jud. Admin., and Florida Bar Rule 4-1.16(b), hereby move to withdraw as counsel for Potential Intervenor, PELICAN CAPITAL MANAGEMENT, LLC (“Pelican Capital”), in this action and as good cause would show:

1. The law firm of Kubicki Draper and Angela C. Flowers, Esquire, and the law firm of ArentFox Schiff and Adam J. Ruttenberg, Esquire, are counsel of record for Potential Intervenor, Pelican Capital.

2. On April 7, 2023, Pelican Capital served its Notice of Withdrawal of June 2, 2022 Motion to Intervene.

3. Pelican Capital, in accordance with the withdrawal of its Motion to Intervene, will proceed as a claimant having submitted Proofs of Claim to the Corporate Monitor pursuant to the Court-ordered Claims Process. Pelican Capital’s Consent to Withdrawal is hereby attached as Exhibit A.

4. Pursuant to Rule 2.505(f) and Florida Bar Rule 4-1.16(b), good cause exists for this Court to enter an Order permitting withdrawal and relieving counsel of any further obligations to

Pelican Capital.

WHEREFORE, the law firm of Kubicki Draper and Angela C. Flowers, Esquire, and the law firm of ArentFox Schiff and Adam J. Ruttenberg, Esquire, move to withdraw as counsel for Potential Intervenor, PELICAN CAPITAL MANAGEMENT, LLC, and request entry of an order granting the relief requested herein.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 10th day of April, 2023, a true and correct copy of the foregoing was served electronically through the Florida Court's E-Filing Portal upon all registered users listed in the Service List below.

/s/ Angela C. Flowers

Angela C. Flowers
Florida Bar No.: 510408
Kubicki Draper
1396 N.E. 20th Avenue, Building 500
Ocala, Florida 34470
Telephone: (352) 622-4222
Facsimile: (352) 622-9122
E-Mail: af-kd@kubickidraper.com

ARENTFOX SCHIFF
Adam J. Ruttenberg
(admitted *pro hac vice*)
800 Boylston Street, 32nd Floor
Boston, Massachusetts 02199
Telephone: (617) 973-6279
E-Mail: adam.ruttenberg@afslaw.com

*Attorneys for Intervenor,
Pelican Capital Management, LLC*

SERVICE LIST

<p>A. Gregory Melchior, Esquire, Chief Counsel George C. Bedell, III, Esquire, Chief Counsel Office of General Counsel Florida Office of Financial Regulation 200 East Gaines Street Tallahassee, Florida 32309 Greg.Melchior@flofr.gov George.Bedell@flofr.gov Sharon. Sutor@flofr.gov <i>Counsel for Plaintiff</i></p> <p>Jeffrey H. Sloman, Esquire Ian M. Ross, Esquire Stumphauzer Foslid Sloman Ross & Kolaya, PLLC One Biscayne Tower 2 South Biscayne Blvd., Suite 1600 Miami, Florida 33131 jsloman@sfslaw.com iross@sfslaw.com <i>Counsel for Defendants, Brian J. Schwartz and Ameritonian Enterprises, LLC</i></p> <p>Susan Yoffee, Esquire Gary A. Woodfield, Esquire Nason Yeager Gerson Harris & Fumero, P.A. 3001 PGA Blvd., Suite 305 Palm Beach Gardens, Florida 33410 syoffee@nasonyeager.com gwoodfield@nasonyeager.com <i>Counsel for The Estate of Eric Charles Holtz</i></p> <p>Victoria R. Morris, Esquire Andrew C. Lourie, Esquire Kobre & Kim LLP 201 South Biscayne Blvd., Suite 1900 Miami, Florida 33131 andrew.lourie@kobrekim.com victoria.morris@kobrekim.com <i>Counsel for Relief Defendant Seeman Holtz Property and Casualty LLC</i></p>	<p>David L. Luikart, III, Esquire Hill, Ward & Henderson, P.A. 101 East Kennedy Blvd., Suite 3700 Tampa, Florida 33602 dave.luikart@hwlaw.com michelle.armstrong@hwlaw.com <i>Counsel for Prime Short Term Credit, Inc.</i></p> <p>Scott Alan Orth, Esquire Law Offices of Scott Alan Orth 3860 Sheridan Street, Suite A Hollywood, Florida 33021 scott@orthlawoffice.com service@orthlawoffice.com eserviceSAO@gmail.com <i>Counsel for Defendant, Marshal Seeman, Twenty-six Defendant Entities</i></p> <p>Daniel J. Stermer, Esquire Development Specialists, Inc. 500 West Cypress Creek Road, Suite 400 Fort Lauderdale, Florida 33309 dsterner@DSIConsulting.com <i>Corporate Monitor</i></p> <p>Brian G. Rich, Esquire Gavin C. Gaukroger, Esquire Berger Singerman LLP 525 Okeechobee Blvd., Suite 1250 West Palm Beach, Florida 33401 brich@bergersingerman.com ggaukroger@bergersingerman.com <i>Counsel for Corporate Monitor, Daniel J. Stermer</i></p>
---	---

<p>Joshua W. Dobin, Esquire James C. Moon, Esquire Meland Budwick, P.A. 3200 Southeast Financial Center 200 South Biscayne Blvd. Miami, Florida 33131 jdobin@melandbudwick.com jmoon@melandbudwick.com mramos@melandbudwick.com <i>Counsel for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC</i></p> <p>Bernard Charles Carollo, Jr., Esquire John J. Truitt, Esquire William Leve, Esquire Vernon Litigation Group 8985 Fontana Del Sol Way Naples, Florida 34109 bcarollo@vernonlitigation.com jtruitt@vernonlitigation.com wleve@vernonlitigation.com nzumaeta@vernonlitigation.com <i>Counsel for Edwin and Karen Ezrine, Intervenors and Tom Echolds, Interested Party</i></p>	<p>Harris J. Koroglu, Esquire Shutts & Bowen LLP 200 South Biscayne Blvd., Suite 4100 Miami, Florida 33131 hkoroglu@shutts.com <i>Counsel for MCM 301 Yamato LLC</i></p> <p>Gary M. Murphree, Esquire Brandy Abreu, Esquire AM Law, LC 10743 S.W. 14th Street Miami, Florida 33186 gmm@amlaw-miami.com babreu@amlaw-miami.com mramirez@amlaw-miami.com pleadings@amlaw-miami.com <i>Counsel for Zoe Seijas and Victor Seijas, Jr., Trustees of Victor Seijas Living Trust</i></p>
---	---

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.

CONSENT TO MOTION TO WITHDRAW AS ATTORNEYS OF RECORD

I, Robert Logan, as Principal of Pelican Capital Management, LLC, consent to the withdrawal of the law firm of Kubicki Draper and Angela C. Flowers, Esquire, and the law firm of ArentFox Schiff and Adam J. Ruttenberg, Esquire, in this action and further stipulate and agree to the entry of an order providing for the withdrawal of the law firm of Kubicki Draper and Angela C. Flowers, Esquire, and the law firm of ArentFox Schiff and Adam J. Ruttenberg, Esquire, and additionally providing that they are released from any further obligation to Pelican Capital Management, LLC, with respect to this matter and in accordance with its intention to proceed as a claimant having submitted Proofs of Claim to the Corporate Monitor pursuant to the Court-ordered Claims Process.



Robert Logan

MANAGER

Title

4/5/23

Date