

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.

**NOTICE OF WITHDRAWAL OF JUNE 2, 2022 MOTION
OF PELICAN CAPITAL MANAGEMENT, LLC, TO INTERVENE**

Proposed Intervenor, PELICAN CAPITAL MANAGEMENT, LLC, by and through its undersigned attorney's, hereby gives notice of withdrawal of its Motion to Intervene served on June 2, 2022. Henceforth, PELICAN CAPITAL MANAGEMENT, LLC, in accordance with its 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.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 7th 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@sflaw.com iross@sflaw.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@hwhlaw.com michelle.armstrong@hwhlaw.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>
--	---

Daniel J. Stermer, Esquire
Development Specialists, Inc.
500 West Cypress Creek Road, Suite 400
Fort Lauderdale, Florida 33309
dstermer@DSIConsulting.com
Corporate Monitor

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
Counsel for Corporate Monitor, Daniel J. Stermer

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
*Counsel for Teleios LS Holdings V DE, LLC
and Teleios LS Holdings IV DE, LLC*

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
*Counsel for Edwin and Karen Ezrine,
Intervenors and Tom Echolds, Interested
Party*

Harris J. Koroglu, Esquire
Shutts & Bowen LLP
200 South Biscayne Blvd., Suite 4100
Miami, Florida 33131
hkoroglu@shutts.com
Counsel for MCM 301 Yamato LLC

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
*Counsel for Zoe Seijas and Victor Seijas, Jr.,
Trustees of Victor Seijas Living Trust*