

**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.

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**NOTICE OF HEARING**  
*(Motion Calendar)*

**THIS MATTER** is set for hearing before **The Honorable Bradley Harper** in **Courtroom 9D** via ZOOM at the Palm Beach County Courthouse, 205 North Dixie Highway, West Palm Beach, Florida:

**DATE OF HEARING:** Wednesday, August 23, 2023

**TIME OF HEARING:** 8:45 A.M.

**TIME RESERVED FOR HEARING:** MOTION CALENDAR

**MATTER(s) TO BE HEARD:**

**RECEIVER, DANIEL J. STERMER'S MOTION TO APPROVE SETTLEMENT  
AGREEMENT AND MUTUAL GENERAL RELEASE WITH AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS NATIONAL BANK, AND AMERICAN  
EXPRESS TRAVEL RELATED SERVICES COMPANY**

**ZOOM INFORMATION:**

Join Zoom Meeting

<https://us02web.zoom.us/j/94110438096?pwd=TjVsQ3ROYWZQcklZbjV3RkdRTUd5Zz09>

Meeting ID: 94110438096; Password: 208540

Dial-in Information:

1 8778535257 US Toll-Free

1 8884754499 US Toll-Free

**Local Rule 4\* Certification**

XXX      *Movant's attorney has spoken in person or by telephone with the attorney(s) for all parties who may be affected by the relief sought in the motion in a good faith effort to resolve or narrow the issues raised.*

\_\_\_\_\_      *Movant's attorney has attempted to speak in person or by telephone with the attorney(s) for all parties who may be affected by the relief sought in the motion.*

\_\_\_\_\_      *One or more of the parties who may be affected by the motion are self represented.*

Dated: August 4, 2023

BERGER SINGERMAN LLP  
*Counsel for Receiver*  
525 Okeechobee Boulevard, Suite 1250  
West Palm Beach, FL 33401  
Tel. (850) 561-3010  
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By: /s/ Brian G. Rich  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on August 4, 2023, a copy of the foregoing was filed with the Clerk of the Court via the 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.

**I FURTHER CERTIFY** that on August 4, 2023, a true and correct copy of the foregoing, along with a copy of the Motion, were served by electronic transmission upon counsel for American Express, Frank N. White, Esq., Arnall Golden Gregory LLP, 171 17<sup>th</sup> Street NW, Suite 2100 Atlanta, GA 30363, [frank.white@agg.com](mailto:frank.white@agg.com).

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>Daniel J. Stermer, Esq.  <i>Development Specialists, Inc.</i>  500 W. Cypress Creek Road, Suite 400  Fort Lauderdale, Florida 33309  dstermer@DSIConsulting.com  <i>Receiver</i></p>	<p>Susan Yoffee, Esq.  Gary A. Woodfield, Esq.  <i>Nason Yeager Gerson Harris &amp; Fumero, P.A.</i>  3001 PGA Boulevard, Suite 305  Palm Beach Gardens, FL 33410  syoffee@nasonyeager.com  gwoodfield@nasonyeager.com  sdaversa@nasonyeager.com  <i>Counsel for The Estate of Eric Charles Holtz</i></p>
<p>Victoria R. Morris, Esq.  Andrew C. Lourie, Esq.  Kobre &amp; 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 &amp; 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, Intervenor And Tom Echolds, Interested Party</i></p>

<p>Gary M. Murphree, Esq.  Brandy Abreu, Esq.  AM Law, LC  10743 SW 104<sup>th</sup> 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 &amp; Bowen LLP  200 South Biscayne Boulevard, Suite 4100  Miami, FL 33131  hkoroglu@shutts.com  <i>Attorneys for MCM 301 Yamato LLC</i></p>
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This notice is provided pursuant to Administrative Order No. 2.207-1/15

**“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Tammy Anton, Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”**

**“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Tammy Anton, 205 N. Dixie Highway, West Palm Beach, Florida 33401; teléfono número (561) 355-4380, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.”**

**“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte Tammy Anton, kòòdonatè pwogram Lwa pou ameriken ki Enfim yo nan Tribinal Konte Palm Beach la ki nan 205 North Dixie Highway, West Palm Beach, Florida 33401; telefòn li se (561) 355-4380 nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”**