

**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 FILING AFFIDAVIT IN SUPPORT OF BERGER SINGERMAN LLP'S  
SECOND INTERIM MOTION FOR COMPENSATION FOR PROFESSIONAL  
SERVICES AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM AUGUST 1, 2022 THROUGH MAY 11, 2023**

Daniel J. Stermer (the “Corporate Monitor” and now “Receiver”) for the property, assets and business of the thirty-two (32) corporate-entities<sup>1</sup>, by and through undersigned counsel, hereby files the attached *Affidavit in Support of Berger Singerman LLP's Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period*

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<sup>1</sup> The Receivership 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.

*From August 1, 2022 Through May 11, 2023 dated October 17, 2023.*

DATED: October 17, 2023

Respectfully submitted,

BERGER SINGERMAN LLP  
*Counsel for Corporate Monitor/Receiver*  
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  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 17, 2023, 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>Daniel J. Stermer, Esq.  <i>Development Specialists, Inc.</i>  500 W. Cypress Creek Road, Suite 400  Fort Lauderdale, Florida 33309  dsterner@DSIConsulting.com  <i>Receiver</i></p>	<p>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  <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@hwhlaw.com  Michelle.armstrong@hwhlaw.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 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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GRACE HOLDINGS FINANCIAL, LLC,  
PRIME SHORT TERM CREDIT INC.,

Defendants.



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 \$274,234.80 and costs in the amount of \$4,989.98 sought through *Berger Singerman LLP's Second Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From August 1, 2022 Through May 11, 2023* (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 559.90 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 has voluntarily reduced its fee request by 20%, or \$68,558.70, 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.

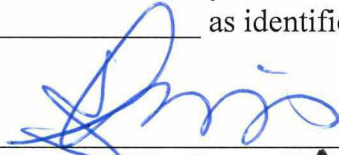
8. I have no interest in the outcome of this litigation and I am not associated with or employed by any party to this action or by the attorneys involved in this matter.

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 17<sup>th</sup> day of October, 2023, by Glenn D. Moses who is personally known to me or who has produced \_\_\_\_\_ as identification.

  
\_\_\_\_\_  
Notary Public, State of Florida  
My Commission Expires:

