

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CIVIL DIVISION

STATE OF FLORIDA,
OFFICE OF FINANCIAL REGULATION,

CASE NO.: 50-2021-CA-008718-XXXX-MB

Plaintiff,

vs.

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et al.*,

Defendants.

**NOTICE OF INTENT
TO SEEK PRODUCTION FROM A NON-PARTY**

NOTICE IS HEREBY GIVEN that, pursuant to Fla. R. Civ. P. 1.351, after ten (10) days from the date of service of this notice, if service is by delivery or e-mail and fifteen (15) days before the subpoena is issued if the service is by mail, and if no objection is received from any party, the undersigned will issue or apply to the clerk of this court for issuance, the attached subpoena directed to **RECORDS CUSTODIAN, HUDSON STRUCTURED CAPITAL MANAGEMENT, LTD., 2187 Atlantic St., 4th Floor, Stamford, CT 06902**, to produce the items listed at the time and place specified in the subpoena.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been filed, served and furnished to

A. Gregory Melchior, Esq., Greg.Melchior@flofr.gov

via the Florida Courts e-Filing Portal on this 27th day of October, 2021.

/s/ Scott Alan Orth, Esq.

SCOTT ALAN ORTH, ESQ.

Florida Bar No. 436313

Counsel for Defendants

LAW OFFICES OF SCOTT ALAN ORTH, P.A.

3860 Sheridan Street, Suite A

Hollywood, FL 33021

305.757.3300 / 305.757.0071 Fax

scott@orthlawoffice.com

service@orthlawoffice.com (primary)

eserviceSAO@gmail.com (secondary)

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Plaintiff,

vs.

NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et al.*,

Defendants.

SUBPOENA FOR PRODUCTION OF DOCUMENTS FROM NON-PARTY

THE STATE OF FLORIDA

**TO: RECORDS CUSTODIAN
HUDSON STRUCTURED CAPITAL MANAGEMENT, LTD
2187 Atlantic St., 4th Floor
Stamford, CT 06902**

YOU ARE COMMANDED to go to Law Offices of Scott Alan Orth, P.A., 3860 Sheridan Street, Suite A, Hollywood, Florida 33021, **no later than 2:00 pm on November 19, 2021**, and bring with you at that time and place the documents listed below. These items will be inspected and may be copied at that time. You will not have to leave the original items.

You may obey this subpoena by providing readable copies of the items to be produced to the party or his/her attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon payment in advance of the reasonable cost of preparation. If you mail or deliver the copies to the attorney whose name appears on this subpoena before the date indicated above, you do not have to appear in person.

You may be in contempt of court if you fail to: (1) appear as specified; (2) furnish the records instead of appearing as provided above; or (3) object to this subpoena.

You can only be excused by the person whose name appears on this subpoena and, unless excused by that person or the Court, you shall respond as directed.

1. We are requesting the following:
 - a. Any and all correspondence and communications with State of Florida, Office of Financial Regulation regarding any of the Defendants in this case as specifically set forth in **Schedule A** attached hereto.
2. A declaration will be needed to verify the authenticity of the copies provided.
3. No deposition testimony will be needed at this time.
4. Records may be produced electronically to service@orthlawoffice.com.

I CERTIFY that I gave notice to every other party to this action of my intent to serve a subpoena upon a person who is not a party to this action directing that person to produce documents or things without deposition. I also certify that no objection under Florida Rule of Civil Procedure 1.351 has been received by the undersigned within ten (10) days of service of this notice, if service was by hand delivery or email, and within fifteen (15) days if service was by mail.

DATED on this ____ day of October, 2021.

SCOTT ALAN ORTH, ESQ.
Florida Bar No. 436313
Counsel for Defendants
LAW OFFICES OF SCOTT ALAN ORTH, P.A.
3860 Sheridan Street, Suite A
Hollywood, FL 33021
305.757.3300 / 305.757.0071 Fax
scott@orthlawoffice.com
service@orthlawoffice.com (primary)
eserviceSAO@gmail.com (secondary)

SCHEDULE A

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 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.