

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

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

STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION,

Plaintiff,

vs.

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

Defendants.

_____/

**DEFENDANT, GARY A. WOODFIELD, AS PERSONAL REPRESENTATIVE FOR
THE ESTATE OF ERIC HOLTZ'S ANSWER TO COMPLAINT**

Defendant, Gary A. Woodfield, as Personal Representative for the Estate of Eric Holtz (the “Personal Representative”), by and through his undersigned attorneys answers the complaint and alleges as follows:

1. Defendant, Personal Representative, admits the allegations in paragraphs 8 through 19 of the Complaint.
2. Defendant, Personal Representative, lacks knowledge or information sufficient to form a belief as to the remaining allegations of the Complaint, and, therefore denies same.

WHEREFORE, Defendant, Gary A. Woodfield, as Personal Representative for the Estate of Eric Holtz, requests that this Court enter judgment in his favor and against Plaintiff, dismissing the complaint, and for such other and further relief as the Court deems appropriate in the circumstances, together with an award of attorney’s fees and costs.

Dated: November 22, 2021

NASON YEAGER GERSON HARRIS & FUMERO, P.A.
3001 PGA Boulevard, Suite 305
Palm Beach Gardens, FL 33410
Phone: (561) 686-3307

Fax: (561) 686-5442
syoffee@nasonyeager.com
sdaversa@nasonyeager.com

By: /s/ Susan Yoffee
Susan Yoffee, Esq.
FL Bar No. 511919

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49 on this 22nd day of November, 2021 to A. Gregory Melchior, Esq., 200 East Gaines Street, Tallahassee, Florida 32309, email: Greg.Melchior@flofr.gov and sharon.sutor@flofr.com.

By: /s/ Susan Yoffee
Susan Yoffee, Esq.
FL Bar No. 511919