

**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, *et al.*,

Plaintiffs,

v.

Case No.: 50-2021-CA-008718-XXXX-MB

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

Defendants.

**INTERVENORS EDWIN AND KAREN EZRINE'S FIRST REQUEST FOR
COPIES OF DOCUMENTS AND RECORDS**

COMES NOW, requesting Parties, Intervenors, EDWIN EZRINE (“Mr. Ezrine”), and KAREN EZRINE (“Mrs. Ezrine”) (collectively, “the Ezrines” or “Requesting Parties”), by and through their undersigned attorneys, pursuant to Fla. R. Civ. P. 1.351(d) and other applicable Florida law, and hereby requests that the Corporate Monitor, Daniel J. Stermer (hereinafter, “Corporate Monitor”), and the Corporate Monitor’s attorneys, provide the Requesting Parties with legible copies of each and every document, record of information, object, video, and/or photographs provided to them in response to the following Subpoenas to Produce Documents, Information, or Objects (hereinafter, “Requests” or “Requests for Copies”):

DEFINITIONS

1. The term “related to” shall mean having as its subject, concerning, referring to, describing, evidencing or, in whole or in part, constituting.

INSTRUCTIONS

2. Each Request shall be deemed to call to produce only those documents or tangible things that are related to the Requesting Parties Motion to Intervene (Doc. Nos. 83-84) including, but not limited to, those documents or tangible things related to the following entities:

- a. CENTURION INSURANCE SERVICES GROUP, LLC;
- b. EMERALD ASSETS 2018, LLC;
- c. PARA LONGEVITY 2016-5, LLC;
- d. CENTURION ISG HOLDINGS, LLC;
- e. CENTURION ISG HOLDINGS II, LLC;
- f. CENTURION ISG (Europe) Limited;
- g. CENTURION ISG SERVICES, LLC;
- h. CENTURION FUNDING SPV I, LLC; and
- i. CENTURION FUNDING SPV II, LLC.

3. These Requests for Copies are directed to the Corporate Monitor and his agents, servants, assigns, representatives, and attorneys, past and present, unless otherwise protected by privilege as defined under applicable Florida law.

4. If an objection is made to any of the following Requests, the reason for the objection shall be stated.

5. In accordance with Fla. R. Civ. P. 1.280(b)(6), where a claim of privilege is asserted in objecting to any Request or part thereof, and information is not provided on the basis of such assertion, the Corporate Monitor and his attorneys shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable the Requesting Parties to assess the applicability of the privilege or protection. *See* Fla. R. Civ. P. 1.280.

6. In asserting the privilege, the responding party shall, in the objection to the Request, or part thereof, identify with specificity the nature of the privilege (including work product) that is being claimed;

i. The following information should be provided in the objection, if known or reasonably available, unless divulging such information would cause disclosure of the allegedly privileged information:

a. For oral communications:

1. the name of the person making the communication and the names of persons present while the communication was made, and, where not apparent, the relationship of the persons present to the person making the communication;
2. the date and place of the communication; and
3. the general subject matter of the communication

b. For documents:

1. the type of document;
2. the general subject matter of the document;
3. the date of the document; and
4. such other information as is sufficient to identify the document, including, where appropriate, the author, addressee, custodian, and any other recipient of the document, and where not apparent, the relationship of the author, addressee, custodian, and any other recipient to each other.

7. Each Request shall be deemed to call to produce copies of the original document or tangible thing to the extent that it is in or subject to, directly or indirectly, the Corporate Monitor's control. In addition, each request shall be deemed to include all copies and, to the extent applicable, preliminary drafts of documents differing in any respect from copies of the original or final draft

or from each other, e.g., by reason of differences in form or content or by reason of handwritten notes or comments having been added to one copy of a document but not on the original or other copies thereof.

REQUESTS FOR COPIES OF DOCUMENTS AND RECORDS

8. That certain *Subpoena Duces Tecum Without Deposition* dated September 29, 2021, and directed to:

**Wells Fargo Bank, N.A.
Attn: Corporation Service Company, Registered Agent
1201 Hayes Street
Tallahassee, FL 32301-2525**

See Doc. No. 20.

9. That certain *Supplemental Subpoena Duces Tecum Without Deposition* dated November 19, 2021, and directed to:

**Wells Fargo Bank, N.A.
Attn: Corporation Service Company, Registered Agent
1201 Hayes Street
Tallahassee, FL 32301-2525**

**Timothy J. Lindquist, Paralegal
Wells Fargo Legal Department
90 South 7th Street, 17th Floor
Minneapolis, MN 55479
Timothy.j.lindquist@wellsfargo.com**

**Jonathan B. Morton, Esq.
K&L Gates
Southeast Financial Center, Suite 3900
200 South Biscayne Blvd.
Miami, FL 33131
Jonathan.morton@klgates.com**

See Doc. No. 45.

10. That certain *Subpoena Duces Tecum Without Deposition* dated September 29, 2021, and directed to:

**First National Bank of Coffee County
d/b/a First National Bank Costal Community (FNBCC)
301 Yamato Road, Suite 1111
Boca Raton, FL 33431**

See Doc. No. 21.

11. That certain *Supplemental Subpoena Duces Tecum Without Deposition* dated November 12, 2021, and directed to:

**First National Bank of Coffee County (FNBCC)
c/o Richard Pearlman, Esq.
Igler Pearlman, P.A.
2457 Care Drive, Suite 203
Tallahassee, FL 32308
Richard.pearlman@iglerlaw.com**

See Doc. No. 37.

12. That certain *Second Supplemental Subpoena Duces Tecum Without Deposition* dated April 14, 2022, and directed to:

**First National Bank of Coffee County
d/b/a First National Bank Costal Community (FNBCC)
301 Yamato Road, Suite 1111
Boca Raton, FL 33431**

**First National Bank of Coffee County (FNBCC)
c/o Richard Pearlman, Esq.
Igler Pearlman, P.A.
2457 Care Drive, Suite 203
Tallahassee, FL 32308
Richard.pearlman@iglerlaw.com**

13. That certain *Subpoena Duces Tecum Without Deposition* dated October 1, 2021, and directed to:

**Coral Gables Collateral Agency, Inc.
f/k/a Coral Gables Title and Escrow, Inc.
Attn: Jeffery L. Baxter, Esq., Registered Agent
One Datran Centre
9100 S. Dadeland Boulevard,
Suite 700
Miami, FL 33156**

See Doc. No. 22.

14. That certain *Subpoena Duces Tecum Without Deposition* dated November 4, 2021,
and directed to:

Brighthouse Life Insurance Company
Attn: Chief Financial Officer, Registered Agent
200 Gaines Street
Tallahassee, FL 32399

See Doc. No. 33.

15. That certain *Subpoena Duces Tecum Without Deposition* dated October 11, 2021,
and directed to:

AXA Equitable Life Insurance Co.
Attn: Tammy Blume
1290 Avenue of the Americas
New York, NY 10104
Tammy.blume@equitable .com

See Doc. No. 18.

16. The Requesting Parties agree to pay a reasonable cost for copying these documents.
If the reproduction cost is over \$350, please contact the undersigned for approval prior to copying
the documents requested.

Respectfully submitted this 27th day of April 2022.

VERNON LITIGATION GROUP
Attorneys for Edwin and Karen Ezrine,
Intervenors/Plaintiffs

/s/ Bernard Charles Carollo, Jr.
Bernard Charles Carollo, Jr.
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E-mail: nzumaeta@vernonlitigation.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was electronically filed with this Court via the Florida Courts E-Filing Portal on this 27th day of April 2022, which will send notification of such filing and serve a true and correct copy thereof, via e-mail upon all electronic service parties.

By: /s/ Bernard Charles Carollo, Jr.
Bernard Charles Carollo, Jr.