

**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,
BRIAN J. SCHWARTZ, EMERALD ASSETS 2018, LLC,
CENTURION INSURANCE SERVICES GROUP, 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.,

Defendants,

THE ESTATE OF ERIC CHARLES HOLTZ,
SEEMAN HOLTZ PROPERTY AND CASUALTY, LLC
F/K/A SEEMAN HOLTZ PROPERTY AND CASUALTY, INC.,
and SHPC HOLDINGS I, LLC,

Relief Defendants.

**NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILING
AS TO LIMITED OBJECTION OF PELICAN CAPITAL MANAGEMENT, LLC, TO
SALE OF CENTURION ASSETS**

Pursuant to Florida Rule of Judicial Administration 2.420(d)(2), the undersigned hereby certifies that:

- (1) We are filing herewith a document containing confidential information as described in Rule 2.420(d)(1)(B);
- (2) The title/type of document is LIMITED OBJECTION OF PELICAN CAPITAL MANAGEMENT, LLC TO SALE OF CENTURION ASSETS;
- (3) The confidential information within the document is precisely located at pdf:
 - Page 5, ¶11
 - Page 6, ¶¶11, 12, 13
 - Page 7, ¶¶13, 14
 - Page 8, ¶17
 - Page 9, ¶¶18, 19
 - Page 10
 - Page 14
 - Page 29
 - Page 31
 - Page 33
 - Page 34
 - Page 49
 - Page 51
 - Page 53
 - Page 54
 - Page 73
 - Page 74

Respectfully submitted this 2nd day of June, 2022.

/s/ Angela C. Flowers

Angela C. Flowers
Florida Bar No.: 510408
Kubicki Draper
1396 N.E. 20th Avenue, Building 500
Ocala, Florida 34470
Telephone: (352) 622-4222
Facsimile: (352) 622-9122
E-Mail: af-kd@kubickidraper.com

and

ARENT FOX SCHIFF
Adam J. Ruttenberg
(applying for admission *pro hac vice*)
800 Boylston Street, 32nd Floor
Boston, Massachusetts 02199
Telephone: (617) 973-6279
E-Mail: adam.ruttenberg@afslaw.com

*Attorneys for Intervenor,
Pelican Capital Management, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of June, 2022, a true and correct copy of the foregoing was served electronically through the Florida Court's E-Filing Portal upon all registered users and served by U.S. Mail to non-registered users listed in the Service List below.

/s/ Angela C. Flowers

Angela C. Flowers
Florida Bar No.: 510408
Kubicki Draper
1396 N.E. 20th Avenue, Building 500
Ocala, Florida 34470
Telephone: (352) 622-4222
Facsimile: (352) 622-9122
E-Mail: af-kd@kubickidraper.com

SERVICE LIST

<p>A. Gregory Melchior, Esquire, Chief Counsel George C. Bedell, III, Esquire, Chief Counsel Office of General Counsel Florida Office of Financial Regulation 200 East Gaines Street Tallahassee, Florida 32309 Greg.Melchior@flofr.gov George.Bedell@flofr.gov Sharon. Sutor@flofr.gov <i>Counsel for Plaintiff</i></p> <p>Jeffrey H. Sloman, Esquire Ian M. Ross, Esquire Stumphauzer Foslid Sloman Ross & Kolaya, PLLC One Biscayne Tower 2 South Biscayne Blvd., Suite 1600 Miami, Florida 33131 jsloman@sflaw.com iross@sflaw.com <i>Counsel for Defendants, Brian J. Schwartz and Ameritonian Enterprises, LLC</i></p> <p>Susan Yoffee, Esquire Gary A. Woodfield, Esquire Nason Yeager Gerson Harris & Fumero, P.A. 3001 PGA Blvd., Suite 305 Palm Beach Gardens, Florida 33410 Counsel for The Estate of Eric Charles Holtz</p> <p>Victoria R. Morris, Esquire Andrew C. Lourie, Esquire Kobre & Kim LLP 201 South Biscayne Blvd., Suite 1900 Miami, Florida 33131 andrew.lourie@kobrekim.com victoria.morris@kobrekim.com <i>Counsel for Relief Defendant Seeman Holtz Property and Casualty LLC</i></p>	<p>David L. Luikart, III, Esquire Hill, Ward & Henderson, P.A. 101 East Kennedy Blvd., Suite 3700 Tampa, Florida 33602 dave.luikart@hwhlaw.com michelle.armstrong@hwhlaw.com <i>Counsel for Prime Short Term Credit, Inc.</i></p> <p>Scott Alan Orth, Esquire Law Offices of Scott Alan Orth 3860 Sheridan Street, Suite A Hollywood, Florida 33021 scott@orthlawoffice.com service@orthlawoffice.com eserviceSAO@gmail.com <i>Counsel for Defendant, Marshal Seeman, Twenty-six Defendant Entities</i></p> <p>Daniel J. Stermer, Esquire Development Specialists, Inc. 500 West Cypress Creek Road, Suite 400 Fort Lauderdale, Florida 33309 dsterner@DSIConsulting.com <i>Corporate Monitor</i></p> <p>Brian G. Rich, Esquire Gavin C. Gaukroger, Esquire Berger Singerman LLP 525 Okeechobee Blvd., Suite 1250 West Palm Beach, Florida 33401 brich@bergersingerman.com ggaukroger@bergersingerman.com <i>Counsel for Corporate Monitor, Daniel J. Stermer</i></p>
---	---

<p>Joshua W. Dobin, Esquire James C. Moon, Esquire Meland Budwick, P.A. 3200 Southeast Financial Center 200 South Biscayne Blvd. Miami, Florida 33131 jdobin@melandbudwick.com jmoon@melandbudwick.com mramos@melandbudwick.com <i>Counsel for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC</i></p> <p>Bernard Charles Carollo, Esquire John J. Truitt, esquire William Leve, Esquire Vernon Litigation Group 8985 Fontana Del Sol way Naples, Florida 34109 bcarollo@vernonlitigation.com jtruitt@vernonlitigation.com wleve@vernonlitigation.com nzumaeta@vernonlitigation.com <i>Counsel for Edwin and Karen Ezrine, Intervenors</i></p>	<p>Harris J. Koroglu, Esquire Shutts & Bowen LLP 200 South Biscayne Blvd., Suite 4100 Miami, Florida 33131 hkoroglu@shutts.com <i>Counsel for MCM 301 Yamato LLC</i></p> <p>Gary M. Murphree, Esquire Brandy Abreu, Esquire AM Law, LC 10743 S.W. 14th Street Miami, Florida 33186 gmm@amlaw-miami.com babreau@amlaw-miami.com mramirez@amlaw-miami.com pleadings@amlaw-miami.com <i>Counsel for Zoe Seijas and Victor Seijas, Jr., Trustees of Victor Seijas Living Trust</i></p> <p>Nathan Evans Mirna Hammoud. Maple Life Analytics 4350 East-West Highway, Suite 905 Bethesda, Maryland 20814 nevans@maplelf.com mhammoud@maplelifeanalytics.com <i>Maple Life Analytics</i></p>
--	---