

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 DEFENDANT PRIME SHORT TERM
CREDIT, INC'S CROSSCLAIM**

Defendant, Gary A. Woodfield, as Personal Representative for the Estate of Eric Holtz (the "Personal Representative"), by and through his undersigned attorneys answers the crossclaim filed by Prime Short Term Credit Fund, Inc's ("Prime") and alleges as follows:

1. Defendant, Personal Representative, lacks knowledge or information sufficient to form a belief as to the allegations in paragraphs 221 through 262 of the Crossclaim, and therefore denies same.
2. Defendant files no response to the allegations of paragraphs 263 through 269 which seeks no relief as to Defendant.
3. As to paragraph 270 of the Crossclaim, Defendant incorporates his response to the General Allegations as though fully set forth herein.
4. Defendant, Personal Representative, lacks knowledge or information sufficient to form a belief as to the allegations in paragraph 271 through 281 of the Crossclaim, and therefore denies same.

5. As to paragraph 282 of the Crossclaim, Defendant incorporates his response to the General Allegations as though fully set forth herein.

6. Defendant, Personal Representative, lacks knowledge or information sufficient to form a belief as to the allegations in paragraph 283 through 292 of the Crossclaim, and therefore denies same.

7. As to paragraph 293 of the Crossclaim, Defendant incorporates his response to the General Allegations as though fully set forth herein.

8. Defendant, Personal Representative, lacks knowledge or information sufficient to form a belief as to the allegations in paragraph 294 through 295 of the Crossclaim, 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 Defendant Prime Short Term Credit, Inc, dismissing the Crossclaim, 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.

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By: /s/ Gary A. Woodfield
Gary A. Woodfield, Esq.
FL Bar No. 0563102

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed using the Florida Court's E-Filing Portal on this 28th day of July 2022, which served a copy of the foregoing electronically upon all electronic service parties on the attached service list in compliance with Fla. Admin. Order No. 13-49.

By: /s/ Gary A. Woodfield
Gary A. Woodfield, Esq.
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SERVICE LIST

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