

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

CIVIL DIVISION

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

STATE OF FLORIDA,  
OFFICE OF FINANCIAL REGULATION,

Plaintiff,

v.

NATIONAL SENIOR INSURANCE, INC.  
(d/b/a Seeman Holtz); *et al*,

Defendants.

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**MOTION TO (I) AMEND ORDER IMPLEMENTING  
CASE MANAGEMENT PLAN AND (II) DESIGNATE CASE AS COMPLEX**

Defendant, MARSHAL SEEMAN, by and through undersigned counsel, pursuant to Fla. R. Civ. P. 1.201(a) and AO 3.107, hereby moves this Court to (i) amend the Order Implementing Civil Differentiated Case Management Plan (entered on February 22, 2022); and (ii) designate this case for proceedings on the Complex Track and in support thereof, states as follows:

1. The Court entered an order on February 22, 2022 setting forth the case management plan and designating this case on the streamlined track.
2. Based on the complex issues involved in this case, the dollar amounts involved, and the number of entities involved and virtually represented, this case qualifies and should proceed under the “complex” track.
3. As this Court is aware, the matters have become complex as the parties have been to date dealing primarily with the Monitorship and pleading issues. As those issues are starting to wind down or shift to areas that could further achieve recoveries, the parties (OFR, the

Corporate Monitor and Defendant Seeman, among others) have had certain discussions and have agreed that a complex designation and progress deadlines should be implemented.

***WHEREFORE***, Defendant, MARSHAL SEEMAN, respectfully requests that the Court designate this case as complex and issue a new case management order in accordance therewith and any other relief deemed just and proper.

**CERTIFICATE OF SERVICE**

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

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via the Florida Courts e-Filing Portal this 27th day of September, 2022.

/s/ Scott Alan Orth, Esq.  
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