

**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,  
CENTURION INSURANCE SERVICES GROUP, LLC,  
BRIAN J. SCHWARTZ,  
EMERALD ASSETS 2018, LLC,  
INTEGRITY ASSETS 2016, LLC,  
INTERGRITY 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.,  
SHPC HOLDINGS I, LLC,

Relief Defendants.

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**RECEIVER'S *EX-PARTE* MOTION TO EXTEND DEADLINES IN ORDER  
ESTABLISHING PROCEDURES GOVERNING RECOVERY ACTIONS  
TO BE COMMENCED BY THE RECEIVER**

Daniel J. Stermer, as Court-appointed Receiver (the “Receiver” and formerly the “Corporate Monitor”), by and through undersigned counsel, files this *ex parte* motion to extend certain deadlines in the *Order Establishing Procedures Governing Recovery Actions to Be Commenced By The Receiver* (“Procedures Order”). In support of this Motion, the Receiver states:

1. On September 5, 2023, entered the Procedures Order<sup>1</sup> governing certain recovery actions the Receiver intends to file against third-parties (the “Recovery Actions”).

2. Paragraph 6 of the Procedures Order provides:

Within thirty (30) days of entry of this Order, the Receiver shall identify a mediator that will serve as the default mediator for all of the Actions (the “**Mediator**”). If the Mediator has a scheduling conflict or if the Mediator has a conflict with respect to a particular defendant, then the Receiver shall, in his sole discretion, select another mediator to mediate such Proceeding. In the event a party objects to the Mediator or any other mediator selected by the Receiver, and are unable to come to an agreement on an alternate mediator, the parties shall notify the Court, which will ultimately decide the mediator for that particular Proceeding. (the “Mediator Deadline”).

3. Paragraph 20 of the Procedures Order provides:

The Receiver will file a list of Key Witnesses within thirty (30) days of an order approving this Motion. (the “Key Witness Deadline”).

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<sup>1</sup> Capitalized terms used herein shall have the same meaning as set forth in the Procedures Order.

4. The current Mediator Deadline and Key Witness Deadline is October 5, 2023.

5. The Receiver has been diligently drafting Complaints to be filed and additional demand letters to be sent in connection with the Recovery Actions. However, as of the date of this Motion, the Receiver has not yet filed the Recovery Actions.

6. By this Motion, the Receiver respectfully requests that the Court extend the Mediator Deadline and the Key Witness Deadline identified in the Procedures Order for an additional thirty (30) days.

7. The continued drafting of complaints may impact the identification of the Key Witnesses and the identification of the Mediator may be premature since no complaints have yet been filed. This is the first motion filed by the Receiver requesting a continuance of the Mediator Deadline and the Key Witness Deadline and the Receiver submits no parties will be prejudiced by requested extension of time.

8. Receiver has not conferred with anyone regarding the extension requested herein but does not believe conferral is necessary, as no Recovery Actions have yet been filed.

9. This Motion is not being made for purposes of undue.

**WHEREFORE**, the Receiver respectfully requests that the Court enter an Order in the form attached as **Exhibit A** (i) granting this Motion; (ii) extending the Mediator Deadline and the Key Witness Deadline to November 6, 2023; and (iii) granting such other and further relief

as the Court deems just and proper.

**DATED:** October 5, 2023

BERGER SINGERMAN LLP  
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By: /s/ *Brian G. Rich*

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**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on October 5, 2023, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties. I further certify that a true and correct copy of the foregoing was served by electronic transmission and first class, U.S. Mail upon all parties on the attached Service List.

By: /s/ *Brian G. Rich*

Brian G. Rich

## SERVICE LIST

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# **EXHIBIT A**

**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,

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

NATIONAL SENIOR INSURANCE, INC.  
D/B/A SEEMAN HOLTZ,  
MARSHAL SEEMAN,  
CENTURION INSURANCE SERVICES GROUP, LLC,  
BRIAN J. SCHWARTZ,  
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CENTURION FUNDING SPV I LLC,  
CENTURION FUNDING SPV II LLC,  
GRACE HOLDINGS FINANCIAL, LLC,  
PRIME SHORT TERM CREDIT INC.,

Defendants.

**EXHIBIT A**



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

Relief Defendants.

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**ORDER GRANTING RECEIVER'S EX-PARTE MOTION TO EXTEND  
DEADLINES IN ORDER ESTABLISHING PROCEDURES GOVERNING  
RECOVERY ACTIONS TO BE COMMENCED BY THE RECEIVER**

**THIS MATTER** came before the Court on the *Receiver, Daniel J. Stermer's Motion to Extend Deadlines in Order Establishing Procedures Governing Recovery Actions To Be Commenced by the Receiver* (the "Motion"). The Court, having considered the Motion, having reviewed the Court file, and being otherwise fully advised in the premises, it is hereupon,

**ORDERED and ADJUDGED** that:

1. The Motion is **GRANTED**.
2. The Mediator Deadline<sup>1</sup> and the Key Witness Deadline is extended through November 6, 2023.

**DONE AND ORDERED** in Chambers at West Palm Beach, Florida this \_\_\_\_ day of \_\_\_\_\_, 2023.

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BRADLEY HARPER  
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Corporate Monitor

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<sup>1</sup> Capitalized terms used herein shall have the same meaning as set forth in the Motion.

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