

**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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**SHUTTS & BOWEN LLP'S OBJECTIONS AND RESPONSES TO  
THE RECEIVER'S SUBPOENA *DUCES TECUM* WITHOUT DEPOSITION**

Shutts & Bowen LLP ("Shutts") hereby serves its objections and responses to the Subpoena *Duces Tecum* Without Deposition (the "Requests") issued by Daniel J. Stermer, as Receiver (the "Receiver").

**RESERVATION OF RIGHTS**

1. Shutts specifically notes that its objections and responses are provided subject to, and with waiver of, its right to object to the admission into evidence of any of the information and/or documents produced in response to the Requests on the grounds that such information and/or documents are not admissible.

2. Shutts' responses are based solely on its current knowledge, understanding, and belief as to the facts and information presently known to it from the investigation and analysis it has conducted to date. As a result, Shutts' responses reflect only the current state of its knowledge, understanding and belief respecting the matters about which inquiry is made. Shutts reserves all rights related to the information and documents produced pursuant to the Requests.

3. Shutts further reserves the right to rely, in future proceedings, on: (i) subsequently discovered evidence, information, facts, documents or witnesses; and (ii) additional evidence, information, facts, or documents omitted from or inconsistent with these responses in good faith,

either as a result of mistake, error, or oversight, or as a result of Shutts' inability to locate, collect, and analyze all potentially responsive information and/or documents within the time permitted. Shutts further reserves the right to change or supplement these responses if different or additional responsive information and/or documents is/are forthcoming.

### **GENERAL OBJECTIONS**

1. Shutts' responses to the Requests are subject to the General Objections set forth below, which are incorporated (as applicable) into Shutts' responses to the specific Requests.

2. Shutts objects to the Requests to the extent they seek documents that are repetitive, cumulative, or duplicative, or are obtainable from some other source that is more convenient, less burdensome, less expensive, and/or equally available to and accessible by the requesting party.

3. Shutts objects to the Requests to the extent that they are burdensome, oppressive or harassing or they purport to impose obligations on Shutts beyond those contemplated by applicable rules or law.

4. Shutts objects to providing documents that are not relevant to the issues in the receivership and/or are not reasonably calculated to lead to the discovery of admissible evidence in these proceedings.

5. The response that requested documents will be produced does not mean that any and/or all of the documents exist. It means only that, subject to and as limited by these general objections, the documents will be produced to the extent they exist, are under Shutts' control, and are able to be located by Shutts based on a reasonable search.

6. By responding to the Requests, Shutts does not waive these General Objections or the specific objections set forth in its response to a particular Request. Shutts' responses to these

Requests are made without prejudice to, or waiver of, any objections to any future discovery that the Receiver may serve upon Shutts relating to the same or different subject matter.

1. The responses contained herein are made on behalf of Shutts. To prepare these responses, counsel for Shutts has collected information as required by law. Nothing in this document shall constitute a waiver of any right, claim or defense by Shutts.

2. Where Shutts agrees below to produce documents, those documents will be produced electronically under separate cover.

### **DOCUMENTS TO BE PRODUCED**

1. Any and all documents and communications in your possession relating to (i) Receivership Defendants, (ii) Consenting Individual Defendants, (iii) Defendants; and (iv) Relief Defendants during the period of January 1, 2015 through the present.

**RESPONSE:** Shutts objects that to this request on the grounds that it is vague, ambiguous, compound and overly broad in that it seeks “all documents and communications...”, which includes conceivably tens of thousands of documents which may tangentially meet the improperly overbroad definitions.

Subject to and without waiving its General Objections and those set forth in this response, Shutts will electronically produce, under separate cover, a volume of 4,502 documents bearing numbers NSI000001 to NSI068301. The volume contains all relevant, non-privileged documents located after a reasonable search of documents and communications in Shutts’ possession. Shutts has likewise designated certain responsive documents as privileged. A privilege log will likewise be produced under separate cover.

Dated: December 11, 2023

**SHUTTS & BOWEN LLP**  
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/s/ Harris J. Koroglu  
Harris J. Koroglu, Esq.  
Florida Bar No. 32597

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 11, 2023, a true and correct copy of the forgoing was furnished via email to counsel for the Receiver at: [brich@bergersingerman.com](mailto:brich@bergersingerman.com); and [miles@bergersingerman.com](mailto:miles@bergersingerman.com).

/s/ Harris J. Koroglu  
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