

**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.

NOTICE OF HEARING
(Motion Calendar)

THIS MATTER is set for hearing before **The Honorable Bradley Harper** in **Courtroom 9D** via ZOOM at the Palm Beach County Courthouse, 205 North Dixie Highway, West Palm Beach, Florida:

DATE OF HEARING: Thursday, January 11, 2024

TIME OF HEARING: 8:45 A.M.

TIME RESERVED FOR HEARING: MOTION CALENDAR

MATTER(s) TO BE HEARD:

**RECEIVER'S MOTION FOR (I) ORDER RELIEVING RECEIVER FROM TAX
OBLIGATIONS, (II) DECLARATION OF CONSTRUCTIVE TRUST OVER
RECEIVERSHIP ASSETS, AND (III) DECLARATION OF
SATISFACTION OF 31 U.S.C. § 3713(b)**

ZOOM INFORMATION:

Join Zoom Meeting

<https://us02web.zoom.us/j/94110438096?pwd=TjVsQ3ROYWZQcklZbjV3RkdRTUd5Zz09>

Meeting ID: 94110438096; Password: 208540

Dial-in Information:

1 8778535257 US Toll-Free

1 8884754499 US Toll-Free

Local Rule 4* Certification

XXX *Movant's attorney has spoken in person or by telephone with the attorney(s) for all parties who may be affected by the relief sought in the motion in a good faith effort to resolve or narrow the issues raised.*

_____ *Movant's attorney has attempted to speak in person or by telephone with the attorney(s) for all parties who may be affected by the relief sought in the motion.*

_____ *One or more of the parties who may be affected by the motion are self represented.*

Dated: December 29, 2023

BERGER SINGERMAN LLP
Counsel for Receiver
525 Okeechobee Boulevard, Suite 1250
West Palm Beach, FL 33401
Tel. (850) 561-3010
Fax (850) 561-3013

By: /s/ Brian G. Rich
Brian G. Rich
Florida Bar No. 38229
brich@bergersingerman.com
Gavin C. Gaukroger
Florida Bar No. 76489
ggaukroger@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
mniles@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 29, 2023, a copy of the foregoing was filed with the Clerk of the Court via the E-filing Portal, which served a copy of the foregoing electronically upon all electronic service parties on the attached Electronic Service Parties List.

I FURTHER CERTIFY that a true and correct copy of the foregoing was served by first class, U.S. Mail on December 29, 2023, upon all taxing authorities identified on the attached Service List.

By: /s/ Brian G. Rich
Brian G. Rich

ELECTRONIC SERVICE PARTIES LIST

<p>A. Gregory Melchior, Esq., Chief Counsel George C. Bedell, III, Esq., Chief Counsel <i>Office of General Counsel</i> <i>Florida Office of Financial Regulation</i> 200 East Gaines Street Tallahassee, FL 32309 Greg.Melchior@flofr.gov George.Bedell@flofr.gov Sharon.Sutor@flofr.gov <i>Counsel for Plaintiff</i></p>	<p>Scott Alan Orth, Esq. <i>Law Offices of Scott Alan Orth</i> 3860 Sheridan Street, Ste. A Hollywood, FL 33021 scott@orthlawoffice.com service@orthlawoffice.com eserviceSAO@gmail.com <i>Attorney for Defendant Marshal Seeman, Twenty-six Defendant Entities</i></p>
<p>Daniel J. Stermer, Esq. <i>Development Specialists, Inc.</i> 500 W. Cypress Creek Road, Suite 400 Fort Lauderdale, Florida 33309 dsterner@DSIConsulting.com <i>Receiver</i></p>	<p>Gary A. Woodfield, Esq. <i>Nason Yeager Gerson Harris & Fumero, P.A.</i> 3001 PGA Boulevard, Suite 305 Palm Beach Gardens, FL 33410 gwoodfield@nasonyeager.com sdaversa@nasonyeager.com <i>Counsel for The Estate of Eric Charles Holtz</i></p>
<p>Victoria R. Morris, Esq. Andrew C. Lourie, Esq. Kobre & Kim LLP 201 South Biscayne Boulevard, Suite 1900 Miami, FL 33131 Andrew.Lourie@kobrekim.com Victoria.Morris@kobrekim.com <i>Attorneys for Relief Defendant Seeman Holtz Property and Casualty LLC</i></p>	<p>David L. Luikart III, Esq. Hill, Ward & Henderson, P.A. 101 East Kennedy Boulevard, Suite 3700 Tampa, FL 33602 Dave.luikart@hwlaw.com Michelle.armstrong@hwlaw.com <i>Attorneys for Prime Short Term Credit, Inc.</i></p>
<p>Joshua W. Dobin, Esq. James C. Moon, Esq. Meland Budwick, P.A. 3200 Southeast Financial Center 200 South Biscayne Boulevard Miami, FL 33131 jdobin@melandbudwick.com jmoon@melandbudwick.com mramos@melandbudwick.com <i>Attorneys for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC</i></p>	<p>Bernard Charles Carollo, Jr., Esq. John J. Truitt, Esq. William Leve, Esq. Vernon Litigation Group 8985 Fontana Del Sol Way Naples, FL 34109 bcarollo@vernonlitigation.com jtruitt@vernonlitigation.com wleve@vernonlitigation.com nzumaeta@vernonlitigation.com <i>Attorneys for Edwin and Karen Ezrine, Intervenor And Tom Echolds, Interested Party</i></p>

<p>Gary M. Murphree, Esq. Brandy Abreu, Esq. AM Law, LC 10743 SW 104th Street Miami, FL 33186 gmm@amlaw-miami.com babreu@amlaw-miami.com mramirez@amlaw-miami.com pleadings@amlaw-miami.com <i>Attorneys for Zoe Seijas and Victor Seijas, Jr., Trustees of Victor Seijas Living Trust</i></p>	<p>Harris J. Koroglu, Esq. Shutts & Bowen LLP 200 South Biscayne Boulevard, Suite 4100 Miami, FL 33131 hkoroglu@shutts.com <i>Attorneys for MCM 301 Yamato LLC</i></p>
<p>Carey D. Schreiber, Esq. Winston & Strawn LLP 200 Park Avenue New York, NY 10166-4193 cschreiber@winston.com <i>Attorneys for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC</i></p>	<p>Robert W. Pearce, Esq. Robert Wayne Pearce, P.A. 1499 W. Palmetto Park Road, Suite 400 Boca Raton, FL 33486 pearce@rwpearce.com adam@rwpearce.com telly@rwpearce.com</p>

SERVICE LIST

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346	Special Asst. U.S. Attorney P.O. Box 9, Stop 8000 51 W 1st Avenue, #1114 Miami, FL 33130
Special Asst. U.S. Attorney IRS District Counsel 1000 Pine Island Road, Suite 340 Plantation, FL 33324-3906	The Hon. Merrick B. Garland Attorney General of the U.S. 950 Pennsylvania Ave., NW, Room 4400 Washington, DC 20530-0001
The Hon. Juan Antonio Gonzalez Office of the U.S. Attorney 500 Australian Ave., Ste. 400 West Palm Beach, FL 33401	Florida Department of Revenue 5050 Tennessee Street Tallahassee, FL 32399
Florida Department of Revenue 2468 Metrocentre Blvd. West Palm Beach, FL 33407	Palm Beach County Tax Collector P.O. Box 3715 West Palm Beach, FL 33402-3715
Office of the Palm Beach County Attorney 301 Olive Avenue, Ste. 601 West Palm Beach, FL 33401	State of Florida Office of Financial Regulation 400 North Congress Avenue, Suite 310 West Palm Beach, FL 33401
State of Florida Office of Financial Regulation 101 E. Gaines Street Tallahassee, FL 32399	Florida Department of Financial Services 200 East Gaines Street Tallahassee, FL 32399
Florida Department of Business and Professional Regulation 2601 Blair Stone Road Tallahassee, FL 32399	Florida Commissioner of Insurance Regulation 200 E. Gaines Street Tallahassee, FL 32399
Delaware Division of Revenue 820 N. French Street Wilmington, DE 19801	Georgia Department of Revenue P.O. Box 740380 Atlanta, GA 30374
Ohio Department of Taxation 4485 Northland Ridge Blvd. Columbus, OH 43229	The Hon. Kathy Jennings Office of the Attorney General 102 W. Water Street, Ste. 2 Dover, DE 19904
The Hon. Chris Carr Office of the Attorney General 40 Capitol Square, SW Atlanta, GA 30334	The Hon. Dave Yost 30 E. Broad Street, 14th Floor Columbus, OH 43215

This notice is provided pursuant to Administrative Order No. 2.207-1/15

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Tammy Anton, Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Tammy Anton, 205 N. Dixie Highway, West Palm Beach, Florida 33401; teléfono número (561) 355-4380, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte Tammy Anton, kòdonatè pwogram Lwa pou ameriken ki Enfim yo nan Tribinal Konte Palm Beach la ki nan 205 North Dixie Highway, West Palm Beach, Florida 33401; telefòn li se (561) 355-4380 nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”