

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, ET AL,

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.

NONPARTY SHANNON HOLTZ' RESPONSE
TO RECEIVER'S SUBPOENA DUCES TECUM

Nonparty, Shannon Holtz, files this response to Receiver, Daniel J. Stermer's Subpoena Duces Tecum, dated October 23, 2023, served upon Shannon Holtz (the "Subpoena"), and states as follows:

1. Copies of all life insurance policies in the name of Eric Holtz or Eric C. Holtz, including the premiums paid, sources of funds for payment of such premiums, and the proceeds you received therefrom.

RESPONSE: Copies of life insurance policies and documents within Shannon Holtz's possession, custody or control evidencing the payment of premiums and the proceeds she received from such policies will be produced.

2. Documents sufficient to identify all income, gifts, property, assets, or other monetary amounts you received from Eric C. Holtz, Marshal Seeman, or any of the Defendants, including by date, amount, and purpose for such transfer.

RESPONSE: Shannon Holtz did not receive any income, gifts, property, assets, or other monetary amounts from Marshal Seeman or any of the Defendants. Further, she did not receive income, property, assets or other monetary amounts from Eric C. Holtz. Shannon Holtz did receive personal gifts from Eric Holtz, none of which exceeded a value of \$1,500 for which she has no documents.

3. Documents sufficient to identify all proceeds from life insurance policies, Trust distributions, or other income, gift, or other monetary benefit you received from Trust, Eric C. Holtz, or the Estate of Eric C. Holtz, from January 1, 2017 to the present.

RESPONSE: Shannon Holtz received no proceeds from the Trust as defined in the Subpoena's Definitions, which is assumed to be the Eric Holtz Living Trust, dated June 25, 2014. Documents within Shannon Holtz's possession, custody or control identifying proceeds from life insurance policies will be produced.

4. Records of payment(s) for properties owned by Eric C. Holtz, individually, and/or jointly with Shannon Holtz, including real property in Colorado property and/or other states, and 17 Gatehouse Rd., Sea Ranch Lakes, FL 33308 (each and collectively, "Property").

- a. The sources of funds for each mortgage, tax, insurance, or other payment to maintain each Property.

RESPONSE: Shannon Holtz will produce responsive documents within her possession, custody or control.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49 on this 4th day of December, 2023 to Brian G. Rich, Esq., Gavin C. Gaukroger, Esq., Berger Singerman LLP, *Counsel for Corporate Monitor*, 525 Okeechobee Boulevard, Suite 1250, West Palm Beach, FL 33401, brich@bergersingerman.com, drt@bergersingerman.com, zmorton@bergersingerman.com, ggaukroger@bergersingerman.com, efile@bergersingerman.com, ablanco@bergersingerman.com.

NASON YEAGER GERSON HARRIS & FUMERO, P.A.
3001 PGA Boulevard, Suite 305
Palm Beach Gardens, FL 33410
Tel: (561) 686-3307
Fax: (561) 686-5442
gwoodfield@nasonyeager.com
sdaversa@nasonyeager.com

By: /s/ Gary Woodfield
Gary Woodfield
FL Bar No. 0563102