

**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,  
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PARA LONGEVITY 2018-3, LLC,  
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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 UNOPPOSED MOTION FOR EXTENSION OF TIME TO CONDUCT  
MANDATORY MEDIATIONS FOR RECOVERY ACTIONS  
FILED BY THE RECEIVER**

Daniel J. Stermer, as Court-appointed Receiver (the “**Receiver**”) for the property, assets, and business of the thirty-three (33) Receivership entities (collectively, the “**Consenting Corporate Defendants**”)<sup>1</sup>, files this *Receiver’s Unopposed Motion for Extension of Time to Conduct Mandatory Mediations For Recovery Actions Filed By the Receiver*, seeking the entry of an order extending the deadline to conduct mediations in the five recovery actions filed to date by the Receiver. In support of this Motion, the Receiver states:

**Background**

1. On July 12, 2021, the OFR filed a *Complaint for Temporary and Permanent Injunction, Appointment of Receiver, Restitution, Civil Penalties, and Other Statutory and Equitable Relief* (the “**Complaint**”) against the Consenting Corporate Defendants, certain individuals and other entities, and Relief Defendants (the “**OFR Action**”). The Complaint seeks entry of a judgment to restrain acts and practices of the Defendants, including the Consenting

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<sup>1</sup> The Consenting Corporate Defendants include: NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, 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, 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, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC., AGENCY ACQUISITION FUNDING, LLC, AMERICA’S FAVORITE INSURANCE SERVICES LLC, and GRACE HOLDINGS FINANCIAL, LLC.

Corporate Defendants, from violations of various provisions of Chapter 517, Florida Statutes, including sections 517.301, 517.12 and 517.07, and “halt the securities fraud scheme and common enterprise operated and controlled by Defendant Marshal Seeman (“**Seeman**”) and Seeman’s deceased business partner, Eric Charles Holtz (“**Holtz**”).” The Complaint also seeks entry of a judgment against the Consenting Corporate Defendants in the form of the appointment of a receiver, restitution, an award of civil penalties, and disgorgement of ill-gotten gains and unjust enrichment.

2. The Complaint alleges that Seeman and Holtz were assisted in the scheme and enterprise (the “**SH Enterprise**”) by Defendant, Brian J. Schwartz (“**Schwartz**”)<sup>2</sup>, who allegedly acted as the SH Enterprise’s untitled chief financial officer. The Complaint further alleges that as part of the SH Enterprise, Seeman, Holtz and Schwartz created and operated a myriad of corporate entities, certain of which are named as Defendants or Relief Defendants in the Complaint and certain of which are no longer active corporate entities; that the SH Enterprise raised more than \$400 Million in capital since 2011, through the sale of unregistered securities in the form of purportedly secured promissory notes which were purportedly secured by viaticated life settlement policies and other insurance-related assets; that investors were misled regarding the SH Enterprise’s profitability, the existence of sufficient life settlements and other assets securing their investments and the perfection of security interests in those assets; and that the SH Enterprise is a scheme in which new investor monies were commingled within the common enterprise and used to repay prior investors in the ongoing scheme thereby providing the appearance of profitability.<sup>3</sup>

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<sup>2</sup> Mr. Schwartz is now deceased.

<sup>3</sup> The Receiver aware that the Individual Defendants dispute the allegations. Further, the Consenting Corporate Defendants, while they consented to the entry of the Order, did not admit the allegations in the Complaint. *See* Order at ¶ 62 (“Nothing in this Order shall be construed as an admission by the Consenting Defendants, including but not limited to the Consenting Individual Defendants, to any of the allegations in the Complaint, nor shall in any way preclude the Consenting Defendants from contesting Plaintiff’s claims and allegations or raising any defenses and affirmative defenses to the same.”)

3. On September 10, 2021, the OFR filed a *Consent Motion for Appointment of Corporate Monitor*, seeking the appointment of the Corporate Monitor for the property, assets, and businesses of the initial Consenting Corporate Defendants, as well as a temporary injunction against the Consenting Corporate Defendants and two natural-person Defendants, Marshal Seeman and Brian J. Schwartz (the “**Consenting Individual Defendants**”).

4. On September 14, 2021, the Court entered an *Agreed Order Granting Plaintiff’s Consent Motion for Appointment of Corporate Monitor and Related Injunctive Relief* (the “**September 14, 2021 Order**”), thereby approving and appointing, *inter alia*, Daniel J. Stermer as the Corporate Monitor for the Consenting Corporate Defendants and their affiliates, subsidiaries, successors, and assigns, until further Order of the Court (the “**Corporate Monitor**”). On January 6, 2022, the Court entered an agreed order expanding the scope of the corporate monitorship to include five (5) additional corporate entities as Consenting Corporate Defendants (the “**January 6, 2022 Order**”).

5. On March 23, 2023, the Corporate Monitor and the OFR filed a *Joint Motion To Appoint Receiver and Stipulation of Settlement* (the “**Joint Motion**”) seeking the appointment of the Corporate Monitor as Receiver to facilitate the wind-down of the Consenting Corporate Defendants affairs, including the liquidation of assets, disposition and prosecution of claims, and to facilitate litigation against third-parties.

6. The Court entered the Receivership Order (the “**Order Appointing Receiver**”) on May 12, 2023, which provides that Daniel J. Stermer shall serve as Receiver (the “**Receiver**”) for the Receivership Entities and their respective affiliates, subsidiaries, successors, and assigns (individually, each a “**Receivership Estate**,” and collectively, the “**Receivership Estates**”).

7. On September 5, 2023, the Court entered an *Order Establishing Procedures Governing Recovery Actions to be Commenced by the Receiver* (the “**Procedures Order**”), which

established procedures governing all recovery actions to be filed by the Receiver. As set forth in paragraph 5 of the Procedures Order, the Court directed the parties to each recovery action to conduct and complete mandatory mediation within 90 days after each complaint is filed (the “**Mediation Deadline**”), provided, however, that the Receiver may, in his sole discretion, extend the Mediation Deadline without further Order of the Court for an additional thirty (30) days (so that extended mediations must be completed within one hundred and twenty (120) days after the filing of a complaint).

8. On October 25, 2023, the Receiver commenced the following five recovery actions (collectively, the “**Five Recovery Actions**”):

a. *Daniel J. Stermer, Receiver v. Jason Sussman*, Case No. 50-2023-CA-015245-XXXAMB, seeking the recovery of fraudulent transfers totaling \$2,686,122.00;

b. *Daniel J. Stermer, Receiver v. Jeffrey Abramson*, Case No. 50-2023-CA-015224-XXXAMB, seeking the recovery of fraudulent transfers totaling \$503,429.00;

c. *Daniel J. Stermer, Receiver v. Dean Emmets*, Case No. 50-2023-CA-015250XXXAMB, seeking the recovery of fraudulent transfers totaling \$244,031.00;

d. *Daniel J. Stermer, Receiver v. Daniel Tepper*, Case No. 50-2023-CA-15241XXXAMB, seeking the recovery of fraudulent transfers totaling \$405,958.00; and

e. *Daniel J. Stermer, Receiver v. Antonio Dicembrino*, Case No. 50-2023-CA-015228XXXAMB, seeking the recovery of fraudulent transfers totaling \$528,122.00.

9. Pursuant to the Procedures Order, the Mediation Deadline of January 23, 2024 (90 days from October 25, 2023) was extended by the Receiver for an additional thirty (30) days, up through and including February 22, 2024, for the Five Recovery Actions.

10. Mediations were scheduled for (i) February 14, 2024, for the actions against defendants, Daniel Tepper, Antonio Dicembrino, and Dean Emmets, and (ii) February 15, 2024,

for the action filed against Jason Sussman. However, on February 12, 2024, those mediations were postponed due to scheduling conflicts of undersigned counsel. The Receiver has not yet scheduled the mediation in the action filed against defendant Jeffrey Abramson but has engaged with opposing counsel.

### **Relief Requested**

11. By this Motion, the Receiver respectfully requests an extension of the deadline to conduct mandatory mediations for the Five Recovery Actions by an additional sixty-eight (68) days, up through and including April 30, 2024. The Receiver is in the process of rescheduling the mediations with defendants Tepper, Dicembrino, and Emmets, and Sussman in mid-April.

12. The Receiver has communicated with counsel for each of the defendants in the Five Recovery Actions and has been advised that the defendants do not oppose the relief requested herein.

**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 deadline, by sixty-eight (68) days, up through and including April 30, 2024, to conduct mandatory mediations with respect to the Five Recovery Actions; and (iii) granting such other relief as the Court deems just and proper.

Dated: February 22, 2024

BERGER SINGERMAN LLP  
*Counsel for Receiver*  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
Telephone: (850) 561-3010  
Facsimile: (850) 561-3013

By: /s/ Brian G Rich

Brian G. Rich  
Florida Bar No. 38229  
[brich@bergersingerman.com](mailto:brich@bergersingerman.com)  
Gavin Gaukroger  
Florida Bar No. 76489  
[ggaukroger@bergersingerman.com](mailto:ggaukroger@bergersingerman.com)  
Michael J. Niles  
Florida Bar No. 107203  
[mniles@bergersingerman.com](mailto:mniles@bergersingerman.com)

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on February 22, 2024, 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 and listed below.

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

Thomas U. Graner, Esq.  
Graner Platzek & Allison, P.A.  
*Counsel for Daniel Tepper, Dean Emmets,  
and Antonio Dicembrino*  
1699 S. Federal Highway  
Boca Raton, FL 33432  
[tom@granerlaw.com](mailto:tom@granerlaw.com)  
[ivy@granerlaw.com](mailto:ivy@granerlaw.com)  
[kristin@granerlaw.com](mailto:kristin@granerlaw.com)

Robert W. Pearce, Esq.  
Robert Wayne Pearce, P.A.  
*Counsel for Jason Sussman*  
1499 W. Palmetto Park Road, Suite 400  
Boca Raton, FL 33486  
[pearce@rwpearce.com](mailto:pearce@rwpearce.com)

Cody S. Zadanosky, Esq.  
Schwed Kahle & Kress, P.A.  
*Counsel for Jeffrey Abramson*  
11390 North Jog Road, Suite 102  
Palm Beach Gardens, FL 33418  
[czadanosky@schwedpa.com](mailto:czadanosky@schwedpa.com)



## SERVICE 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>Susan Yoffee, Esq.  Gary A. Woodfield, Esq.  <i>Nason Yeager Gerson Harris &amp; Fumero, P.A.</i>  3001 PGA Boulevard, Suite 305  Palm Beach Gardens, FL 33410  syoffee@nasonyeager.com  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 &amp; 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 &amp; 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>

Gary M. Murphree, Esq.  
Brandy Abreu, Esq.  
AM Law, LC  
10743 SW 104<sup>th</sup> Street  
Miami, FL 33186  
gmm@amlaw-miami.com  
babreu@amlaw-miami.com  
mramirez@amlaw-miami.com  
pleadings@amlaw-miami.com  
*Attorneys for Zoe Seijas and Victor Seijas,  
Jr., Trustees of Victor Seijas Living Trust*

Harris J. Koroglu, Esq.  
Shutts & Bowen LLP  
200 South Biscayne Boulevard, Suite 4100  
Miami, FL 33131  
hkoroglu@shutts.com  
*Attorneys for MCM 301 Yamato LLC*

**EXHIBIT A**  
**(Proposed Order)**

**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,  
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CENTURION ISG SERVICES, LLC,  
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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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**ORDER GRANTING RECEIVER’S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO CONDUCT MANDATORY MEDIATIONS FOR RECOVERY ACTIONS  
FILED BY THE RECEIVER**

**THIS CASE** having come before the Court upon the *Receiver’s Unopposed Motion for Extension of Time to Conduct Mandatory Mediations for Recovery Actions Filed by the Receiver* (the “**Motion**”), filed by Daniel J. Stermer (the “**Receiver**”), seeking the entry of an Order extending the deadline by sixty-eight (68) days, up through and including April 30, 2024, to conduct mediations in the Five Recovery Actions<sup>1</sup> filed by the Receiver. The Court, having considered the Motion, having noted that all affected parties have no objection to the relief requested in the Motion, and good cause existing, the Court

**ORDERS** as follows:

1. The Motion is **GRANTED**.
2. The deadline for the parties to the Five Recovery Actions to conduct mandatory mediations pursuant to the Procedures Order, is extended up through and including April 30, 2024.
3. All other terms and conditions set forth in the Procedures Order shall remain in full force and effect.

**DONE AND ORDERED** in Chambers at West Palm Beach, Florida this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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BRADLEY HARPER  
CIRCUIT COURT JUDGE

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

Copies to:

A. Gregory Melchior, Esq. and George Bedell, Esq.  
Office of General Counsel  
Florida Office of Financial Regulation  
200 East Gaines Street  
Tallahassee, Florida 32309  
greg.melchior@flofr.gov  
george.bedell@flofr.gov  
*Attorneys for Plaintiff*

Law Offices of Scott Alan Orth  
3860 Sheridan Street, Ste. A  
Hollywood, FL 33021  
scott@orthlawoffice.com  
service@orthlawoffice.com  
eserviceSAO@gmail.com  
*Attorney for Defendant Marshal Seeman and Twenty-six Defendant Entities*

Daniel J. Stermer, Esq.  
Development Specialists, Inc.  
500 W. Cypress Creek Road, Suite 400  
Fort Lauderdale, Florida 33309  
dsterner@DSIConsulting.com  
*Receiver*

Brian G. Rich, Esq. and Gavin C. Gaukroger, Esq.  
Berger Singerman LLP  
525 Okeechobee Boulevard, Suite 1250  
West Palm Beach, FL 33401  
brich@bergersingerman.com  
ggaukroger@bergersingerman.com  
*Attorneys for Receiver, Daniel J. Stermer*

Gary A. Woodfield, Esq.  
*Nason Yeager Gerson Harris & Fumero, P.A.*  
3001 PGA Boulevard, Suite 305  
Palm Beach Gardens, FL 33410  
gwoodfield@nasonyeager.com  
sdaversa@nasonyeager.com  
*Counsel for The Estate of Eric Charles Holtz*

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  
*Attorneys for Relief Defendant Seeman Holtz Property and Casualty LLC*

David L. Luikart III, Esq.  
Hill, Ward & Henderson, P.A.  
101 East Kennedy Boulevard, Suite 3700  
Tampa, FL 33602  
Dave.luikart@hwhlaw.com  
Michelle.armstrong@hwhlaw.com  
*Attorneys for Prime Short Term Credit, Inc.*

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  
*Attorneys for Teleios LS Holdings V DE, LLC and Teleios LS Holdings IV DE, LLC*

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  
*Attorneys for Edwin and Karen Ezrine, Intervenors and Tom Echolds, Interested Party*

Gary M. Murphree, Esq.

Brandy Abreu, Esq.

AM Law, LC

10743 SW 104<sup>th</sup> Street

Miami, FL 33186

[gmm@amlaw-miami.com](mailto:gmm@amlaw-miami.com)

[babreu@amlaw-miami.com](mailto:babreu@amlaw-miami.com)

[mramirez@amlaw-miami.com](mailto:mramirez@amlaw-miami.com)

[pleadings@amlaw-miami.com](mailto:pleadings@amlaw-miami.com)

*Attorneys for Zoe Seijas and Victor Seijas, Jr., Trustees of Victor Seijas Living Trust*

Harris J. Koroglu, Esq.

Shutts & Bowen LLP

200 South Biscayne Boulevard, Suite 4100

Miami, FL 33131

[hkoroglu@shutts.com](mailto:hkoroglu@shutts.com)

*Attorneys for MCM 301 Yamato LLC*