

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA**

State of Florida
Office of Financial Regulation,
Plaintiff,

Case No.: **50-2021-CA-008718-XXXX-MB**
CIVIL DIVISION

v.

National Senior Insurance, Inc.

et. al.

Defendants,

OBJECTION TO ENTRY OF AGREED FINAL JUDGMENT AGAINST DEFENDANT

Defendant, Richard Donoff (“Donoff”), through his undersigned counsel, files this opposition to Plaintiff’s Motion for Entry of Agreed Final Judgment Against Donoff, and in furtherance thereof, states as follows:

Opposing counsel is misinformed that there is an agreement to the entry of a final judgment against Defendant, Richard Donoff (“Donoff”). The Court is aware that there is a pending motion to set aside the settlement agreement for breach of contract and bad faith, filed on behalf of Donoff. There can be no argument that a motion to set aside a settlement agreement constitutes an objection to the finalizing of such agreement. Yet, the Receiver purports to unilaterally dispense with Donoff’s pleading by stating that he has filed his Motion to Strike and Opposition. In addition, Receiver purports that there is some basis for the Court to issue a final ruling while Defendant’s motion is pending. There is not.

Defendant’s Motion seeking to set aside the Donoff settlement sets forth a cogent and compelling basis for this Court to vitiate said settlement. Moreover, Receiver’s self-serving motion to strike fails to respond to any of the substantive allegations set forth in Defendant’s motion.

Therefore, Donoff respectfully requests that the Court reject the entry of a final

judgment as to Donoff, in favor of a hearing on Donoff's motion on the merits.

Dated: August 16, 2024

Respectfully submitted



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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2024, the foregoing document was filed using the Florida E-Portal Filing System, which will serve a copy of the foregoing electronically upon electronic service to the Plaintiff and all parties listed below.

Dated: August 16, 2024


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