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,

 \mathbf{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,

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Rel	1et	L)eter	idants.

AFFIDAVIT IN SUPPORT OF (I) DANIEL J. STERMER,
RECEIVER, THIRD INTERIM MOTION FOR COMPENSATION
FOR PROFESSIONAL SERVICES AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM MAY 12, 2023 THROUGH SEPTEMBER 30, 2024;
AND (II) AND DEVELOPMENT SPECIALISTS, INC., AS FINANCIAL ADVISOR
TO CORPORATE MONITOR/RECEIVER DANIEL J. STERMER, THIRD INTERIM
MOTION FOR COMPENSATION FOR PROFESSIONAL SERVICES AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
MAY 12, 2023 THROUGH SEPTEMBER 30, 2024

STATE OF FLORIDA)
) ss:
COUNTY OF BROWARD)

BEFORE ME, this date, personally appeared Philip J. Von Kahle, who being first duly sworn, deposes and says:

- 1. My name is Philip J. Von Kahle. I am over the age of 18 and competent to testify.
- 2. I am the President of Michael Moecker & Associates, Inc., located at 1885 Marina Mile Boulevard, Suite 103, Fort Lauderdale, FL 3315, and I have over 20 years of experience as a professional fiduciary.
- 3. I have acted as court-appointed fiduciary for the assignment for the benefit of creditors, receiver, chief restructuring officer, and trustee, and have interacted with lending institutions, secured and unsecured creditors, shareholders, bondholders and business owners.
 - 4. I have reviewed the pleadings and docket in the above captioned case.
- 5. I have reviewed Daniel J. Stermer, Receiver, Third Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period from May 12, 2023 Through

September 30, 2024 (the "Receiver's Fee Motion") specifically as to Daniel J. Stermer's ("Receiver") entitlement to fees, and Development Specialists, Inc., as Financial Advisor to Corporate Monitor/Receiver Daniel J. Stermer Third Interim Motion for Compensation for Professional Services and Reimbursement of Expenses For the Period From May 12, 2023 Through September 30, 2024 (the "DSI Fee Motion"), as to Development Specialists, Inc.'s ("DSI") entitlement to fees and reasonableness of expenses.

- 6. I have reviewed the Receiver and DSI's detailed time records and the pleadings in connection with the above captioned case.
- 7. Based upon the foregoing, it is my opinion that the fees totaling \$449,454.50 sought through the Receiver Fee Motion, and the fees in the amount of \$456,032.00 and expenses in the amount of \$119.81 sought through the DSI Fee Motion are fair and reasonable considering each and every factor contemplated by *Florida Patient's Compensation Fund v. Rowe,* 472 So. 2d 1145 (Fla. 1985) and the principles of *Lewis v. Gramil Corp.*, 94 So. 2d 174, 177 (Fla. 1957). The 1,128.70 hours worked, as set forth in the Receiver Fee Motion, and the 1,869.90 hours worked, as set forth in the DSI Fee Motion, are fair and reasonable. The hourly rates in the Application are reasonable. I base that opinion on, among other things, the significant skill and knowledge necessary to successfully administer this monitorship estate and a review of the records. The services rendered by the Receiver and DSI have substantially benefited the receivership estate.
- 8. I have no interest in the outcome of this litigation and I am not associated with or employed by any party to this action or by the attorneys involved in this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Philip J. Von Kahle

STATE OF FLORIDA)
) ss:
COUNTY OF BROWARD	
The foregoing instrument wa	as acknowledged before me by means of physical presence
or \square online notarization, this 18	day of November, 2024, by Philip J. Von Kahle, who is
personally known to me or who has	produced as identification.

NADIRA B. JOSEPH
MY COMMISSION # HH 186500
EXPIRES: December 11, 2025
Bonded Thru Notary Public Underwriters

Notary Public, State of Florida My Commission Expires: