

**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,  
INTEGRITY 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.

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**RECEIVER’S RESPONSE IN OPPOSITION TO PETER BECK’S MOTION FOR RECONSIDERATION OF THE ORDER DENYING “DEFENDANT’S MOTION TO CANCEL UMC HEARING SCHEDULED FOR DECEMBER 4, 2024, AND FOR SANCTIONS” FOR THAT PORTION OF THE MOTION REGARDING SANCTIONS**

Daniel J. Stermer, in his capacity as Receiver (the “**Receiver**” or “**Plaintiff**”), files this Response in Opposition to Peter Beck’s (“**Beck**”) *Motion for Reconsideration of the Order Denying “Defendants Motion to Cancel UMC Hearing Scheduled For December 4, 2024, and For Sanctions” for that Portion of the Motion regarding Sanctions* (“**Motion to Reconsider**”) and in support thereof states:

1. Mr. Todd A. Zuckerbrod, Esq. (“Mr. Zuckerbrod”) represents several defendants in the supplementary proceeding styled *Daniel J. Stermer, Receiver v. Jason Sussman*, Case No. 2023-CA-015245-XXXA-MB (the “**Sussman Supplemental Action**”).

2. Mr. Zuckerbrod does not represent any named party in this OFR Enforcement Action yet he continues to file inappropriate and inflammatory pleadings in this case (but which purport to relate to his clients in the Sussman Supplemental Action) that only serve to waste this Court’s time and cause the Receiver to incur unnecessary attorneys’ fees and costs to the detriment of the Receivership Estate and ultimately the noteholders (the same noteholders allegedly victimized by Mr. Zuckerbrod’s clients).

3. Notably, in the Receiver’s regular communications with noteholders, he has started to receive feedback from several commenting on the apparent waste of time, resources and money for the Receiver and counsel having to continue to address meritless filings and arguments.

4. Unfortunately, Mr. Zuckerbrod continues to try to bully the Receiver and make completely misguided motions and correspondence that include scandalous unfounded allegations and incorrect factual allegations.

5. The Receiver does not see the need to address each of these allegations individually, but strongly refutes the spurious allegations against the Receiver and counsel in the Motion to Reconsider.

6. The Receiver will remain focused on continuing his efforts to progress these cases and claims against the Defendants in the Sussman Supplemental Action Defendants, including those represented by Mr. Zuckerbrod, for the benefit of the Receivership Estate. The Receiver and undersigned counsel have been successful in amicably and efficiently working through the majority of these matters. For whatever reason, the matters on which Mr. Zuckerbrod is counsel have taken a different path. Unlike Mr. Zuckerbrod, the Receiver and his counsel will not engage in *ad hominem* attacks and will rely on the facts and the law to support the Receiver's positions and arguments to this Court.

7. As to the instant Motion to Reconsider (which is Mr. Zuckerbrod's second)(the first was denied by the Court, appealed to the 4<sup>th</sup> DCA, which appeal was dismissed by the 4<sup>th</sup> DCA for lack of jurisdiction), it is just another attempt to further hinder, delay, and protract this process while making unsupported and nonsensical allegations against the Receiver and his professionals. While, a trial court has the inherent authority to reconsider any nonfinal rulings before entry of a final judgment. *Siegler v. Bell*, 148 So. 3d 473, 479 (Fla. 5th DCA 2014), the Court should not entertain Mr. Zuckerbrod's efforts here and should deny the Motion to Reconsider on the papers submitted.

**WHEREFORE**, the Receiver respectfully requests the Court enter an order denying the Motion to Reconsider.

Dated: December 6, 2024.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on December 6, 2024, a true and correct copy of the foregoing was filed using the Florida E-filing Portal, which will serve electronic notice upon all parties on the attached Service List.

**I FURTHER CERTIFY** that on December 6, 2024, a true and correct copy of the foregoing was served by upon all parties in the Supplemental Action identified on the attached Supplemental Action Service List, in the manner indicated.

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

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