

**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,

**MOTION TO TOLL COLLECTION OF JUDGMENT PENDING MOTION TO VACATE**

COMES NOW the Defendant, Richard Donoff (“Donoff”), by and through his undersigned counsel, respectfully moves this Honorable Court for an Order tolling the collection of the judgment entered in the above-captioned matter pending the outcome of the Motion to Vacate the Judgment, and as grounds states as follows:

1. On August 19, 2024, this Court entered a Final Judgment in favor of Plaintiff and against Defendant in the amount of \$796,295 plus post-judgment interest at the rate of 18% per year from the date of entry until satisfied.
2. On January 17, 2025 Defendant filed a Motion to Vacate the Judgment, citing grounds that the order was signed the day before the hearing was held and by failing to provide Donoff the right to a hearing on the issue of breach of the settlement agreement both of which matters violated Donoff’s due process rights.
3. The Defendant contends that there is a legitimate basis to vacate the judgment, and the outcome of the Motion to Vacate is pending.
4. The Defendant is currently unable to satisfy the judgment due to insufficient funds.
5. In order to preserve Defendant’s right and prevent undue hardship, Defendant respectfully requests the Court toll or stay collection efforts pending the Court’s

determination of the Motion to Vacate.

6. The Plaintiff will not suffer prejudice by the tolling of collection, as it is requested in good faith and will allow the Court to fully consider the merits of the Motion to Vacate.
7. This Motion is made in good faith and is not intended for purposes of delay.

WHEREFORE, Defendant, Richard Donoff, respectfully requests that this Honorable Court enter an Order tolling or staying all collection efforts related to the judgment entered on August 19, 2024 pending the outcome of the Motion to Vacate.

Dated: January 17, 2024

Respectfully submitted

A handwritten signature in blue ink that reads "Todd A. Zuckerbrod". The signature is written in a cursive style with a large, stylized "Z".

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 2025, 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: January 17, 2025

  
Todd A. Zuckerbrod, Esq.

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