

UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF
FLORIDA MIAMI DIVISION

CASE NO. 24-22142-CIV-GAYLES/GOODMAN

**FANNY B. MILLSTEIN and
MARTIN KLEINBART,**

Plaintiffs,

**v.
WELLS FARGO BANK, N.A.,**

Defendant.

**PARTIES' NOTICE OF FILING ACKNOWLEDGEMENT FORM IN
COMPLIANCE WITH COURT ORDER (D.E. 61)**

Plaintiffs Fanny Millstein and Martin Kleinbart (“Plaintiffs”) and Defendant Wells Fargo Bank, N.A. (“Wells Fargo”) (collectively “Parties”); Receiver Daniel Stermer (“Receiver”) as Plaintiff in the related matter *Stermer et al v. Wells Fargo Bank, N.A.*, Case No. 24-cv-80722 (“*Stermer v. Wells Fargo*”), which is consolidated for discovery purposes with the above styled case; and Non-Party State of Florida, Office of Financial Regulation (“OFR”), which has received discovery requests in the above styled case, hereby file the attached Acknowledge Form referenced as Exhibit A to the proposed order attached to the Parties’ Motion for Entry of Confidentiality Order as to Non-Party Florida OFR’s Discovery Responses by Plaintiffs Millstein and Kleinbart, Defendant Wells Fargo Bank, Daniel Stermer As Receiver, and Non-Party Florida OFR, in compliance with this Court’s Order dated January 29, 2025 (D.E. 61).

Dated: January 30, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by CM/ECF on January 30, 2025, on all counsel or parties of record on the Service List below.

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EXHIBIT A

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, _____ [print or type full name], of _____
[print or type full address], declare under penalty of perjury that I have read in its entirety and understand the Confidentiality Stipulation that was agreed to by Plaintiffs Fanny Millstein and Martin Kleinbart, Wells Fargo Bank, N.A., Daniel Stermer as receiver for National Senior Insurance, Inc (and its related entities), and the Florida Office of Financial Regulation, in the case of *Millstein v. Wells Fargo Bank, N.A.*, Case No. 1:24-cv-22142- GAYLES/GOODMAN. I agree to comply with and to be bound by all the terms of this Confidentiality Stipulation, and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Confidentiality Stipulation to any person or entity except in strict compliance with the provisions of this Confidentiality Stipulation.

I further agree to submit to the jurisdiction of the United States District Court for the Southern District of Florida for the purpose of enforcing the terms of this Confidentiality Stipulation, even if such enforcement proceedings occur after termination of this action.

I hereby appoint _____ [print or type full name] of _____ [print or type full address and telephone number] as my agent for service of process in connection with this action or any proceedings related to enforcement of this Confidentiality Stipulation.

Date: _____

City and State where sworn and signed: _____

Printed name: _____

Signature: _____