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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,
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,

Relief Defendants.
_____/

JOINT MOTION BY PLAINTIFF AND RECEIVER FOR CLARIFICATION OF THE ORDER OF DISMISSAL UPON NOTIFICATION OF SETTLEMENT AND DIRECTIONS TO CLERK TO CLOSE FILE

Plaintiff, State of Florida Office of Financial Regulation ("Plaintiff" or "OFR"), and Daniel J. Stermer, as Court-appointed Receiver (the "Receiver") for the property, assets, and business of the thirty-three (33) Receivership entities[1] (the "Receivership Defendants" and, formerly the "Consenting Corporate Defendants", and, together with the Receiver, collectively, the "Receivership Estate") pursuant to the *Order Appointing Receiver* (the "Receivership Order") dated May 12, 2023, file this joint motion requesting the Court to clarify the *Order of Dismissal Upon Notification of Settlement and Directions to Clerk to Close File* (the "Dismissal Order") to confirm that the case will not be dismissed or closed until the Receiver fulfills all responsibilities under the Receivership Order. In support of this Motion, the Plaintiff and Receiver state as follows:

[1] The Consenting Corporate Defendants include: NATIONAL SENIOR INSURANCE, INC. D/B/A SEEMAN HOLTZ, CENTURION INSURANCE SERVICES GROUP, LLC, 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, 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, PARA GLOBAL 2019, LLC, ALLOY ASSETS, LLC, SEEMAN HOLTZ WEALTH MANAGEMENT, INC. AGENCY ACQUISITION FUNDING, LLC, AMERICA'S FAVORITE INSURANCE SERVICES LLC, and GRACE HOLDINGS FINANCIAL, LLC.

Background

1. On September 5, 2025, this Court issued the Dismissal Order, which dismissed the matter based on the settlement of the parties and directed the Clerk of Court to close the file.

2. On May 12, 2023, this Court appointed Daniel J. Stermer as the Receiver for the Receivership Defendants, granting him extensive powers to manage and liquidate the assets of the Receivership Defendants for the benefit of their creditors

3. The Dismissal Order does not explicitly address the status of the Receivership and the Receiver's ongoing responsibilities under the Receivership Order. It is imperative to confirm that the case will not be dismissed or closed until the Receiver completes his duties as outlined in the Receivership Order.

4. The Plaintiff and Receiver respectfully request that this Court clarify the Dismissal Order to confirm that the case will remain open and under the Court's jurisdiction until the Receiver has fulfilled all responsibilities under the Receivership Order, including the liquidation and distribution of assets to creditors.

5. The Court's Dismissal Order retains jurisdiction for the purpose of enforcing the settlement and determining reasonable attorney's fees and costs, if any. This retention of jurisdiction should further extend to overseeing the completion of the Receiver's duties.

WHEREFORE, Plaintiff and Receiver respectfully request entry of a proposed Order in the form attached hereto as **Exhibit 1**: (i) granting the Motion; (ii) clarifying the Order of Dismissal to confirm that the case will not be dismissed or closed until the Receiver completes his responsibilities under the Receivership Order; and (iii) granting such other and additional relief as

the Court deems just and proper.

DATED: September 16, 2025

STATE OF FLORIDA OFFICE OF FINANCIAL REGUATION OFFICE OF GENERAL COUNSEL *Counsel for Plaintiff OFR* 200 East Gaines Street Tallahassee, FL 32309 Tel. (813) 218-5327 Fax (850) 410-9663 By: */s/ A. Gregory Melchior* A. Gregory Melchior, FBN 407290 greg.melchior@flofr.gov George Bedell, FBN 363385 george.bedell@flofr.gov	BERGER SINGERMAN LLP *Counsel for Receiver* 201 E. Las Olas Boulevard Suite 1500 Fort Lauderdale, FL 33301 Tel. (954) 525-9900 Fax (954) 523-2872 By: /s/ *Brian G. Rich* Brian G. Rich, FBN 38229 brich@bergersingerman.com Gavin C. Gaukroger, FBN 76489 ggaukroger@bergersingerman.com Michael J. Niles, FBN 107203 mniles@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 16, 2025, the foregoing was filed using the Florida Court's E-Filing Portal, which served a copy of the foregoing electronically upon all electronic service parties. I further certify that a true and correct copy of the foregoing was served by electronic transmission upon all parties on the attached Service List.

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

SERVICE LIST

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EXHIBIT 1

PROPOSED ORDER

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,
INTERGRITY ASSETS, LLC,
PARA LONGEVITY 2014-5, LLC,
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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.
_____/

ORDER GRANTING JOINT MOTION BY PLAINTIFF AND RECEIVER FOR CLARIFICATION OF THE ORDER OF DISMISSAL UPON NOTIFICATION OF SETTLEMENT AND DIRECTIONS TO CLERK TO CLOSE FILE

THIS MATTER came before the Court, without a hearing, upon the *Joint Motion by Plaintiff and Receiver For Clarification of the Order of Dismissal Upon Notification of Settlement and Directions to Clerk to Close File* (the "Motion") filed jointly by the Plaintiff, State of Florida Office of Financial Regulation ("Plaintiff") and Receiver, Daniel J. Stermer, Receiver ("Receiver"). The Motion seeks the entry of an order clarifying the Court's *Order of Dismissal Upon Notification of Settlement and Directions to Clerk to Close File* entered on September 5, 2025, to confirm that the case will not be dismissed or closed until the Receiver fulfills all responsibilities under the Receivership Order.[1] The Court, having considered the Motion, finding good cause for the granting thereof, and being advised in the premises, does

ORDER as follows:

1. The Motion is **GRANTED**.

2. The instant case captioned *State of Florida Office of Financial Regulation v. National Senior Insurance, Inc. d/b/a Seeman Holtz, et al.*, Case No. 50-2021-CA-008718-XXXX-

[1] Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

MB shall not be dismissed or closed until such time as the Receiver has completed his responsibilities under the Receivership Order.

3. This Order does not impact or alter the resolution of the claims between the Plaintiff and the Defendants.

DONE AND ORDERED in Chambers at West Palm Beach, Florida this _____ day of _____, 2025.

_____
BRADLEY HARPER
CIRCUIT COURT JUDGE

Copies to: Counsel of Record and Receiver

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