IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

IN RE: CHAMPLAIN TOWERS SOUTH COLLAPSE LITIGATION,

CLASS REPRESENTATION

CASE NO: 2021-015089-CA-01

COMPLEX BUSINESS LITIGATION DIVISION

8701 COLLINS DEVELOPMENT, LLC'S SUPPLEMENT TO THE JOINT REPORT REGARDING LITIGATION AND SETTLEMENT INFORMATION

Pursuant to this Court's January 19, 2022, Order, 8701 Collins Development, LLC, without

waiving and instead fully reserving any attorney client or work product privileges, supplements its

response to the Joint Report Regarding Litigation and Settlement Information as follows:

E. a good faith estimate of the total attorney's fees and costs to be incurred by each party (or its insurers) through trial and potential appeals.

1. 8701 Collins Development, LLC:

a. 8701 Collins estimates that it could incur fees and costs in the range of \$8 to \$12 million through trial and \$1 to \$2 million for appeals, for a total of \$9 to \$14 million.

[attorney signature on following page]

Dated: January 20, 2022

Respectfully submitted,

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By: /s/ David Weinstein MICHAEL J. THOMAS Florida Bar No.: 21309 CHRISTOPHER L. BARNETT Florida Bar No.: 0360510 DAVID B. WEINSTEIN Florida Bar No.: 604410 Email: weinsteind@gtlaw.com **RYAN HOPPER** Florida Bar No.: 107347 Email: hopperr@gtlaw.com **GREENBERG TRAURIG, P.A.** 101 E. Kennedy Blvd., Ste. 1900 Tampa, Florida 33602 Tel: (813) 318-5700 Fax: (813) 318-5900

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished, either via transmission of Notices of Service of Court Document generated by the E-Portal or in some other authorized manner for those counsel or parties who are excused from e-mail service on this 20th day of January, 2022.

<u>/s/ David Weinstein</u> Counsel