

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

COMPLEX BUSINESS LITIGATION DIVISION

Case No. 2021-015089-CA-01 (43)

IN RE: CHAMPLAIN TOWERS SOUTH
COLLAPSE LITIGATION

**TG AND TWI'S SUPPLEMENTAL REPORT PROVIDING GOOD FAITH ESTIMATE
OF ANTICIPATED TOTAL OF ATTORNEYS' FEES AND COSTS**

In accordance with this Court's Order entered January 19, 2022 (Doc # 366) directing the filing of a supplemental report in response to the Court's order of January 10, 2022, Defendants Terra Group, LLC ("TG") and Terra World Investments, LLC ("TWI") hereby file this Supplemental Report Providing a Good Faith Estimate of Anticipated Total of Attorneys' Fees and Costs, and state as follows:

Plaintiffs' Second Amended Complaint and the Association's Cross-claim against TG and TWI improperly lumps these defendants with 8701 Collins Development, LLC as the "Terra Defendants." (SAC ¶¶ 14-16; Cross-Cl. ¶ 14, 361.) As pointed out in TG and TWI's motions to dismiss the Second Amended Complaint and Cross-claim, TG and TWI do not belong in this case and the claims against them are defectively pleaded and not viable in any event. Should the Court permit Plaintiffs and the Association to travel against the indiscriminately identified "Terra Defendants," TG and TWI's fees and costs would be those identified by 8701 Collins Development, LLC. A good faith estimate of TG and TWI's attorneys' fees and costs attributable solely to litigating

whether TG and TWI are appropriately joined in this case is \$350,000, through summary judgment and appeal.

Respectfully submitted,

COFFEY BURLINGTON, P.L.
2601 South Bayshore Drive, Penthouse One
Miami, Florida 33133
Telephone: (305) 858-2900
Facsimile: (305) 858-5261

By: _____ s/ Paul J. Schwiep

Paul J. Schwiep, FBN 823244
PSchwiep@CoffeyBurlington.com
Scott A. Hiaasen, FBN 103318
SHiaasen@CoffeyBurlington.com
YVB@CoffeyBurlington.com
LPerez@CoffeyBurlington.com
service@CoffeyBurlington.com

*Counsel for Defendants Terra Group, LLC and
Terra World Investments, LLC*

CERTIFICATE OF SERVICE

I certify that foregoing document was filed with the Florida Courts e-filing Portal this this 20th day of January, 2022 and that all counsel of record were electronically served via the Florida Courts e-filing Portal.

_____ s/ Paul J. Schwiep