

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

CBL DIVISION

CASE NO: 2021-015089-CA-01

**DEFENDANT 8701 COLLINS DEVELOPMENT'S RESPONSE
TO PLAINTIFFS' MOTION TO CERTIFY LIABILITY CLASS**

Defendant 8701 Collins Development, LLC, does not oppose Plaintiffs' Motion to Certify a Liability Class pursuant to Florida Rules of Civil Procedure 1.220(b)(3), 1.220(d)(1), & 1.220(d)(4). 8701 Collins Development reserves its right to move for modification or decertification of any conditionally certified class as appropriate based on subsequent developments in the litigation, as permitted by Rule 1.220(d)(1) and other applicable law.

February 23, 2022

/s/ David Weinstein

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Terra Group, LLC and
Terra World Investments, LLC*

CERTIFICATE OF SERVICE

I CERTIFY that a true and correct copy of the foregoing was furnished to counsel of record by transmission of a Notice of Service of Court Document generated by the Court's E-Portal.

/s/ David Weinstein

David Weinstein