

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

CASE NO: 2021-015089-CA-01

SECTION: CA 43

JUDGE: Michael Hanzman

In re:

Champlain Towers South Collapse Litigation.

NOTICE OF FILING

Michael I. Goldberg, Receiver for the Champlain Towers South Condominium Association, Inc., hereby files the attached letter received by email on March 26, 2022 from the Rodan, Levine and Brief families in response to the proposed Allocation Settlement Agreement.

Dated: March 28, 2022

Respectfully submitted,

/s/ Michael I. Goldberg

Michael I. Goldberg, Esq.

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Court-Appointed Receiver

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 28, 2022, a copy of the foregoing was electronically filed with the Clerk of Court by using the Florida Courts E-Filing Portal and furnished a copy of same to all counsel of record through the Florida Court's E-Filing Portal.

By: *s/ Michael I. Goldberg*

Michael I. Goldberg

Caracas, March 26th 2022

Honorable Judge Hanzman, Received Michael Goldberg and Other Relevant Parties -

We are writing this letter from the Rodan, Levine and Brief families, who had two loved ones 26 and 28 years old perish in the collapse, as well as owned apartment 403.

First of all we would like to thank the receiver, mediator, attorneys and everyone that worked tirelessly to achieve this allocation agreement, and to the judge for setting the space and encouraging them to achieve it.

As we will not be able to attend in person the March 30th Court Hearing to participate, we respectfully ask that the below two items are discussed in the hearing, or that they are asked to the judge so he can state his position on those matters:

1. Before we are ready to accept any allocation agreement, we would like to know what will be the court's decision regarding
 - a. (i) the possible reduction of owner's recovery by any insurance payment received to compensate the value of their unit, and
 - b. (ii) how will the cost of the attorney fees for the economic loss subclass be allocated between both sides

2. We would like to know what is the Judge's position with regards to the percentage of recovery that will be paid for attorney fees for the economic loss subclass, now that we are closer to settling the claims of such subclass

The discussion on the above will give us clarity and help us decide with regards to the allocation agreement, from both of our sides of the case (the wrongful deaths and the property loss).

Thank you for your continued support to everyone involved in this case.

Best Regards,

The Rodan, Levine and Brief families.