

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

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

In re:

Champlain Towers South Collapse Litigation.

**RECEIVER'S RESPONSE IN OPPOSITION TO UNIVERSAL PROPERTY &
CASUALTY INSURANCE COMPANY'S LIMITED OBJECTION TO THE
ALLOCATION SETTLEMENT AGREEMENT**

Michael I. Goldberg (the "Receiver"), in his capacity as the Court-appointed Receiver for the Champlain Towers South Condominium Association, Inc. (the "Association"), hereby responds (the "Response") to Universal Property & Casualty Insurance Company's ("Universal") Limited Objection to the Allocation Settlement Agreement.

In support of this motion, the Receiver states:

1. It is the Receiver's position that Universal does not have standing to object to the Allocation Settlement Agreement and that any objection on Universal's behalf to the Allocation Settlement Agreement is not appropriate at this time.

2. Nevertheless, Receiver's counsel has been in contact with counsel for Universal and is in the process of attempting to reach an agreement to have the basis for their Objections resolved at a later date and has proposed language in the Bar Order to carve out Universal's ability to have their substantive arguments heard at a later date.

3. At the time of this Response, Universal has not communicated its agreement or disagreement to the Receiver's proposed carve out language.

4. Out of an abundance of caution, the Receiver files its Response to Universal's Limited Objection to the Allocation Settlement Agreement and asks this Court to allow both Universal and the Receiver to determine these issues at a later date.

WHEREFORE, Receiver respectfully requests this Court reserve any and all rights and defenses Receiver has associated with Universal's claims and preserve and acknowledge Universal's Limited Objection to the Allocation Settlement Agreement, to be heard at a later date, and grant the Association such other and further relief as the Court deems just and proper.

CERTIFICATE OF SERVICE

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

/s/ Amanda K. Anderson
Mark A. Boyle (FBN: 5886)
Amanda K. Anderson (FBN: 0091297)
BOYLE, LEONARD & ANDERSON, P.A.
9111 W. College Pointe Drive
Fort Myers, FL 33919
(239) 337-1303
eservice@insurance-counsel.com
mboyle@insurance-counsel.com;
aanderson@insurance-counsel.com
CO-COUNSEL FOR RECEIVER