

**IN 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

Plaintiff(s)

vs.

N/A

Defendant(s)

_____ /

**ORDER REQUIRING MEDIATION AND STAYING DISCOVERY AS TO MEDIATING
DEFENDANTS**

This action came before the Court on March 9, 2022, on the *ore tenus* request of the Receiver for an order requiring Defendants 8701 Collins Development, LLC, Terra Group, LLC, Terra World Investments, LLC, and John Moriarty & Associates of Florida, Inc., to mediate with the Plaintiffs and the Receiver on April 27 and 28, 2022. The Court has been advised of the agreement of counsel regarding this mediation and is otherwise duly advised in the premises. Accordingly, it is **ORDERED** and **ADJUDGED** as follows:

1. Defendants 8701 Collins Development, LLC, Terra Group, LLC, Terra World Investments, LLC, John Moriarty & Associates of Florida, Inc. (the “Mediating Defendants”), shall mediate with the Receiver and the putative Plaintiffs’ class, in a joint session with Mediator Bruce Greer, on April 27 and 28, 2022. At least one representative from each party must attend the mediation.

2. All discovery directed at the Mediating Defendants is stayed pending the completion of the mediation, except that each Mediating Defendant must complete its currently ongoing

document production to the Plaintiffs. Inspections, testing, and sampling of evidence, whether located at the Champlain Towers South site or the Miami-Dade County (*i.e.*, NIST) warehouse is not subject to this stay and therefor may proceed. All discovery not directed at a Mediating Defendant is not subject to this stay and may proceed as well.

3. Any insurer that has received a request to defend or indemnify as to any claim asserted against any Mediating Defendant shall ensure that a representative attends the mediation, regardless of whether the insurer has denied coverage or assumed a defense under a reservation of rights. Each insurer shall have at least one representative personally present at the mediation with full authority to tender policy limits. Unless it has already done so, each Mediating Defendant shall disclose to the Plaintiffs its potentially relevant insurance policies no later than Wednesday, April 13, 2022.

DONE and **ORDERED** in Chambers at Miami-Dade County, Florida on this 11th day of March, 2022.



2021-015089-CA-01 03-11-2022 7:25 PM

Hon. Michael Hanzman

CIRCUIT COURT JUDGE

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

Electronically Served:

Aaron Podhurst, apodhurst@podhurst.com

Aaron Podhurst, dricker@podhurst.com

Adam A Schwartzbaum, adams@moskowitz-law.com

Adam A Schwartzbaum, service@moskowitz-law.com

Adam A Schwartzbaum, dione@moskowitz-law.com
Adam Moskowitz, adam@moskowitz-law.com
Adam Moskowitz, dione@moskowitz-law.com
Adam Moskowitz, service@moskowitz-law.com
Alfred Armas, alfred@armaslaw.com
Alison E Patino, apatino@patinolaw.com
Amanda Anderson, AAnderson@insurance-counsel.com
Amanda K Anderson, eservice@insurance-counsel.com
Amanda K Anderson, aanderson@insurance-counsel.com
Amanda K Anderson, InsuranceCounsel2050@gmail.com
Ana Angelica Viciano, anita@miamidade.gov
Ana Angelica Viciano, mbarber@miamidade.gov
Andrew B. Yaffa, aby@grossmanroth.com
Andrew B. Yaffa, omb@grossmanroth.com
Andrew M Feldman, feldmana@kleinpark.com
Andrew M Feldman, montanem@kleinpark.com
Andrew M Feldman, piersonj@kleinpark.com
Andrew P. Gold, Esq., andrew.gold@akerman.com
Andrew P. Gold, Esq., jill.parnes@akerman.com
Andrew Paul Gold, andrew.gold@akerman.com
Andrew Paul Gold, jill.parnes@akerman.com
Andrew Paul Gold, bobbi.engelke@akerman.com
Anthony J Carriuolo, acarriuolo@bergersingerman.com
Anthony J Carriuolo, mnewland@bergersingerman.com
Anthony J Carriuolo, drt@bergersingerman.com
Anthony Perez, aperez@hsmpla.com
Aron Raskas, araskas@gunster.com
Aron Raskas, avalido@gunster.com
Aron Raskas, eservice@gunster.com
Benjamin Fernandez IV, bfernandez@silvasilva.com
Benjamin Fernandez IV, cvereen@silvasilva.com
Benjamin Fernandez, IV, bfernandez@silvasilva.com
Benjamin Fernandez, IV, tgomez@silvasilva.com
Bernadette Vazquez, bvazquez@klugerkaplan.com
Bernadette Vazquez, clong@klugerkaplan.com
Bradford R. Sohn, brad@bradsohnlaw.com
Bradford R. Sohn, paralegal@bradsohnlaw.com
Bradford R. Sohn, service.bradsohnlaw@gmail.com

Bradley J Edwards, staff.efile@epllc.com
Bradley J Edwards, brad@epllc.com
Bradley J Edwards, maria@epllc.com
Brenda Radmacher, brenda.radmacher@akerman.com
Bret M Feldman, feldmanb@phelps.com
Bret M Feldman, yolanda.vazquez@phelps.com
Brian S Dervishi, bdervishi@wdpalaw.com
Brian S Dervishi, service@wdpalaw.com
Bruce Alan Katzen, bkatzen@klugerkaplan.com
Bruce Alan Katzen, cfalla@klugerkaplan.com
Bruce Alan Katzen, probate@klugerkaplan.com
Carlos A. Velasquez, CVelasquez@VDLawyers.com
Carlos A. Velasquez, Andrea@VDLawyers.com
Carlos E Silva, csilva@silvasilva.com
Carlos E Silva, mromera@silvasilva.com
Carlos M. Macias, macias@leesfield.com
Carlos M. Macias, becerra@leesfield.com
Carlos M. Macias, abreu@leesfield.com
Carmen M. Ortega-Rivero, carmen.ortega-rivero@akerman.com
Carmen M. Ortega-Rivero, wendy.gonzalez@akerman.com
Caroline Catchpole Spradlin, caroline.spradlin@phelps.com
Caroline Catchpole Spradlin, samantha.powell@phelps.com
Carolyn M. Luna, cluna@patinolaw.com
Christine L. Welstead, christine.welstead@bowmanandbrooke.com
Christine L. Welstead, ashleigh.carroll@bowmanandbrooke.com
Christine L. Welstead, lisa.morales@bowmanandbrooke.com
Christopher L Barnett, barnettch@gtlaw.com
Christopher L Barnett, nicauda@gtlaw.com
Christopher S Carver, christopher.carver@akerman.com
Christopher S Carver, cary.gonzalez@akerman.com
Cole Scott &Kissane PA, Ryan.Charlson@csklegal.com
Cole Scott &Kissane PA, Ryan.Soofoo@csklegal.com
Cole Scott &Kissane PA, Construction.FTLW@csklegal.com
Cosme Caballero, ccaballero@deutschblumberg.com
Cosme Caballero, kdominguez@deutschblumberg.com
Cosme Caballero, Esq., ccaballero@deutschblumberg.com
Cosme Caballero, Esq., bblumberg@deutschblumberg.com
Curtis Miner, curt@colson.com

Curtis Miner, claudiav@colson.com
Curtis Miner, eservice@colson.com
Daniel Y Gielchinsky, dan@dgimlaw.com
Daniel Y Gielchinsky, eservice@dgimlaw.com
Daniel Y Gielchinsky, colleen@dgimlaw.com
David B. Weinstein, weinsteind@gtlaw.com
David B. Weinstein, thomasm@gtlaw.com
David L Rosinsky Esq., LUKSFLL-Pleadings@LS-LAW.COM
David L Rosinsky Esq., Drosinsky@insurancedefense.net
David L Rosinsky Esq., spare@insurancedefense.net
David M Wells, dwells@gunster.com
David M Wells, dculmer@gunster.com
David M. Murray, dmmurray@miami-airport.com
David M. Murray, dmmurray@miami-airport.com
David M. Murray, rmartin@miami-airport.com
David M. Wells, dwells@gunster.com
David M. Wells, dculmer@gunster.com
David M. Wells, eservice@gunster.com
David Stanoch, david@honiklaw.com
Dorian N. Daggs, ddaggs@hsmmpa.com
Douglas J. Kress, dkress@schwedpa.com
Douglas J. Kress, lrandell@schwedpa.com
Douglas J. Kress, amarcus@schwedpa.com
Dustin C. Blumenthal, dblumenthal@goldbergsegalla.com
Dustin C. Blumenthal, ppowers@goldbergsegalla.com
E. Bruce Johnson, johnson@jambg.com
E. Bruce Johnson, young@jambg.com
Edward Marod, emarod@gunster.com
Edward Marod, dpeterson@gunster.com
Edward R. Blumberg, erb@deutschblumberg.com
Edward R. Blumberg, rmitchell@deutschblumberg.com
Edward R. Blumberg, kdominguez@deutschblumberg.com
Elliot H. Scherker, scherkere@gtlaw.com
Elliot H. Scherker, miamiappellateservice@gtlaw.com
Eric P. Hockman, ehockman@wsh-law.com
Eric P. Hockman, lmartinez@wsh-law.com
Eric Page Hockman, ehockman@wsh-law.com
Eric Page Hockman, lmartinez@wsh-law.com

Eric S Kay, ekay@kttlaw.com
Eric S Kay, ga@kttlaw.com
Eric S Kay, agarcia@kttlaw.com
Felipe Gonzalez, fgonzalez@switkeslaw.com
Felipe Gonzalez, paralegal@switkeslaw.com
Felipe Gonzalez, paralegal@switkeslaw.com
Frank Florio, FFlorio@gunster.com
George R Truitt Jr., george.truitt@csklegal.com
George R Truitt Jr., construction.miami@csklegal.com
Gonzalo Barr, gbarr@dldlawyers.com
Gonzalo Barr, viviane@dldlawyers.com
Gonzalo Dorta, grd@dortalaw.com
Gonzalo R Dorta, grd@dortalaw.com
Gonzalo R Dorta, jpedraza@dortalaw.com
Gonzalo R Dorta, jgonzalez@dortalaw.com
Graham LippSmith, g@lippsmith.com
Graham LippSmith, mb@lippsmith.com
Graham LippSmith, cca@lippsmith.com
Gregory J Kahn, gkahn@boydjen.com
Gregory J Kahn, jsaiz@boydjen.com
Gregory J Kahn, mkruemmel@boydjen.com
H. Clay Roberts, gloria@robertspa.com
H. Clay Roberts, roberts@robertspa.com
H. Clay Roberts, jennifer@robertspa.com
Hali E Marsocci, Hali@RomanoLawGroup.com
Hali E Marsocci, Becky@RomanoLawGroup.com
Hali E Marsocci, Service@RomanoLawGroup.com
Harley S. Tropin Esq., hst@kttlaw.com
Harley S. Tropin Esq., sf@kttlaw.com
Harley Tropin, hst@kttlaw.com
Henry Lawrence Perry, lperry@perry-young.com
Henry Lawrence Perry, kroberson@perry-young.com
Henry Lawrence Perry, frichard@perry-young.com
Henry N. Wixon, henry.wixon@nist.gov
Houston S. Park III, parkh@kleinpark.com
Houston S. Park III, harriss@kleinpark.com
Howard Kraft Pita, spita@pwndlawfirm.com
Howard Kraft Pita, lalvarez@pwndlawfirm.com

Howard Kraft Pita, pitaservice@pwndlawfirm.com
Howard M Bushman, howard@moskowitz-law.com
Howard M Bushman, dione@moskowitz-law.com
JOHN H RUIZ, jruiz@msprecoverylawfirm.com
JOHN H RUIZ, serve@msprecoverylawfirm.com
JOHN H RUIZ, jruiz@msprecovery.com
Janel C. Diamond, jdiamond@gunster.com
Javier A. Lopez Esq., jal@kttlaw.com
Javier A. Lopez Esq., ya@kttlaw.com
Javier A. Lopez Esq., fsr@kttlaw.com
Javier Zapata, jzapata@miamidade.gov
Jeffrey Lee Newsome II, jeffrey.newsome@phelps.com
Jeffrey Lee Newsome II, samantha.powell@phelps.com
Jeffrey Michael Cohen, jmcohen@cfjblaw.com
Jeffrey Michael Cohen, schacon@carltonfields.com
Jeffrey Michael Cohen, miaecf@cfdom.net
Jennifer Glasser, jennifer.glasser@akerman.com
Jennifer Glasser, kelly.connolly@akerman.com
Jennifer Glasser, kim.stathopoulos@akerman.com
Jillian M Askren, askrenj@gtlaw.com
Jillian M Askren, thomasm@gtlaw.com
Joel L McNabney, joel.mcnabney@clydeco.us
Joel L McNabney, Audrie.Finney@clydeco.us
Joel L McNabney, miainsfilings@clydeco.us
John B. Morgan, jmorgan@forthepeople.com
John B. Morgan, kmitnik@forthepeople.com
John B. Morgan, andrew@forthepeople.com
John Davis, jdavis@slackdavis.com
John H. Ruiz, jruiz@msprecoverylawfirm.com
John H. Ruiz, serve@msprecoverylawfirm.com
John H. Ruiz, afernandez@msprecoverylawfirm.com
John Romano, John@RomanoLawGroup.com
John Scarola, _scarolateam@searcylaw.com
John Scarola, mmccann@searcylaw.com
John Scarola, _scarolateam@searcylaw.com
Jonathan E Kanov, jekanov@mdwgc.com
Jonathan E Kanov, kafriday@mdwgc.com
Jordi Guso, jguso@bergersingerman.com

Jordi Gusó, drt@bergersingerman.com
Jordi Gusó, fsellers@bergersingerman.com
Jorge A Calil Esq., jorge@jcalillaw.com
Jorge A Calil Esq., jeannie.calillaw@gmail.com
Jorge L. Piedra, jpiedra@kttlaw.com
Jorge L. Piedra, ga@kttlaw.com
Jorge Silva, jsilva@silvasilva.com
Jorge Silva, csilva@silvasilva.com
Jorge Silva, hsoto@silvasilva.com
Joseph H. Serota, jserota@wsh-law.com
Joseph H. Serota, lmartinez@wsh-law.com
Joseph M. Kaye, joseph@moskowitz-law.com
Joseph M. Kaye, dione@moskowitz-law.com
Josh M Rubens, jrubens@klugerkaplan.com
Josh M Rubens, cfernandez@klugerkaplan.com
Josh M Rubens, probate@klugerkaplan.com
Joshua D Fuller, jfuller@fullerlawyers.com
Joshua D Fuller, lposch@fullerlawyers.com
Joshua Talcovitz, TalcovitzJ@kleinpark.com
Jourdan Leslie Weltman, jw0326@universalproperty.com
Jourdan Leslie Weltman, subrogationservice@universalproperty.com
Jourdan Leslie Weltman, vm1217@universalproperty.com
Judd G. Rosen, pleadings@goldbergandrosen.com
Judd G. Rosen, jgrsecy@goldbergandrosen.com
Julia Holden-Davis, JHoldenDavis@gunster.com
Julia Holden-Davis, dholland@gunster.com
Julian S. Geraci Esq., jgeraci@pbcgov.org
Julian S. Geraci Esq., aairey@pbcgov.org
Karen B Parker, kparker@kbparkerlaw.com
Karen B Parker, fmartinez@kbparkerlaw.com
Karen B Parker, ebacker@kbparkerlaw.com
Kenneth R Drake, kendrake@dldlawyers.com
Kenneth R Drake, viviane@dldlawyers.com
Kerry L. Burns, kburns@bergersingerman.com
Kerry L. Burns, efile@bergersingerman.com
Kimberly C. Hirschman, khirschman@therhlawfirm.com
Kimberly C. Hirschman, nramos@therhlawfirm.com
Laritza Orozco, Orozcol@kleinpark.com

Laura Adams, lauraadams@miamisao.com
Lauren E. Morse, laurenm@miamidade.gov
Lauren E. Morse, olgal@miamidade.gov
Lauren E. Morse, hern@miamidade.gov
Lauren Morse, lauren.morse@miamidade.gov
Lewis N Jack Jr., LNJ@florida-attorneys.com
Lewis N Jack Jr., cmf@florida-attorneys.com
Luis Eduardo Suarez, lsuarez@hsmpa.com
Luis Eduardo Suarez, filings@hsmpa.com
Manual Arteaga-Gomez, aag@grossmanroth.com
Marc J. Gottlieb, marc.gottlieb@akerman.com
Marc J. Gottlieb, joyce.gutierrez@akerman.com
Marc J. Gottlieb, Esq., marc.gottlieb@akerman.com
Marc J. Gottlieb, Esq., joyce.gutierrez@akerman.com
Maria Corghi, mcorghi@silvasilva.com
Maria Corghi, mcorghi@silvasilva.com
Mark A Boyle, Eservice@Insurance-Counsel.com
Mark A Boyle, MBoyle@Insurance-Counsel.com
Mark A Boyle, InsuranceCounsel2050@gmail.com
Mark G. Dicowden, eservice@dicowdenlaw.com
Mark G. Dicowden, service@dicowdenlaw.com
Mark G. Dicowden, mgd@dicowdenlaw.com
Mark J. Heise, mheise@hsmpa.com
Mark J. Sullivan, sullivanm@kleinpark.com
Mark J. Sullivan, piersonj@kleinpark.com
Mark J. Sullivan, montanem@kleinpark.com
Mark R. Antonelli, mantonelli@gabemullen.com
Mark R. Antonelli, cgreer@gabemullen.com
Mark R. Antonelli, lbeggs@gabemullen.com
Matthew Wildner, mjwildner@mdwgc.com
Matthew Wildner, kafriday@mdwgc.com
Meghan C Moore Moore, meghan.moore@flastergreenberg.com
Meghan C Moore Moore, betty.plasencia@flastergreenberg.com
Michael Caballero, mcaballero@hsmpa.com
Michael F. Suarez, MFS-KD@kubickidraper.com
Michael F. Suarez, mfs@kubickidraper.com
Michael I. Goldberg, michael.goldberg@akerman.com
Michael I. Goldberg, charlene.cerda@akerman.com

Michael I. Goldberg, kimberly.smiley@akerman.com
Michael J Thomas, thomasmic@gtlaw.com
Michael J Thomas, cordovam@gtlaw.com
Michael J Thomas, flservice@gtlaw.com
Michael S Hooker, michael.hooker@phelps.com
Michael S Hooker, guy.mcconnell@phelps.com
Michael S Hooker, renee.hogue@phelps.com
Mitchel Chusid, mchusid@ritterchusid.com
Mitchel Chusid, karenz@ritterchusid.com
Mitchel Chusid, ifeliciano@ritterchusid.com
Mustafa Hasan Dandashly, pleadings@goldbergandrosen.com
Mustafa Hasan Dandashly, mdandashly@goldbergandrosen.com
Mustafa Hasan Dandashly, evelyn@goldbergandrosen.com
Nicole Juarez, njuarez@hsmpa.com
Oscar E. Marrero, oem@marrerolegal.com
Patricia Melville, pmelville@hsmpa.com
Paul A. Avron, pavron@bergersingerman.com
Paul J. Schwiep, pschwiep@coffeyburlington.com
Paul J. Schwiep, yvb@coffeyburlington.com
Paul J. Schwiep, service@coffeyburlington.com
Paul Jon Layne, playne@silvasilva.com
Paul Jon Layne, mromera@silvasilva.com
Paul Jon Layne, vramos@silvasilva.com
Paul S Singerman, singerman@bergersingerman.com
Paul S Singerman, mdiaz@bergersingerman.com
Paul S Singerman, efile@bergersingerman.com
Paul Steven Labiner, Pleadings@PIALawCenter.com
Rachel Charys John, rjohn@zdlaw.com
Rachel Charys John, rjohn@zdlaw.com
Rachel Charys John, rjohn@zdlaw.com
Rachel W. Furst, rwf@grossmanroth.com
Rachel Wagner Furst, rwf@grossmanroth.com
Ralph George Patino, service@patinolaw.com
Ralph George Patino, rpatino@patinolaw.com
Ralph George Patino, cluna@patinolaw.com
Rami Shmuely, rshmuely@cmslawgroup.com
Randy M Weber, rmweber@pwndlawfirm.com
Randy M Weber, ngarcia@pwndlawfirm.com

Ricardo Manoel Martinez-Cid, rmcid@podhurst.com
Ricardo Manoel Martinez-Cid, RMCTeam@podhurst.com
Ricardo Manoel Martinez-Cid, lbarrington@podhurst.com
Robert J. Mongeluzzi, rmongeluzzi@smbb.com
Robert J. Mongeluzzi, jgoodman@smbb.com
Robert J. Mongeluzzi, sdordick@smbb.com
Robert L Switkes, Rswitkes@switkeslaw.com
Robert L Switkes, paralegal@switkeslaw.com
Robert L Switkes, bzappala@switkeslaw.com
Robert M Klein, kleinr@kleinpark.com
Robert M Klein, piersonj@kleinpark.com
Robert M Klein, carrillom@kleinpark.com
Rosalyn Lax, rlax@hsmmpa.com
Ruben Honik, ruben@honiklaw.com
Ryan A Waton, rwaton@zdlaw.com
Ryan J. Yaffa, rjy@grossmanroth.com
Ryan M. Charlson, ryan.charlson@csklegal.com
Ryan M. Charlson, nicole.kaufman@csklegal.com
Ryan Thomas Hopper, hopperr@gtlaw.com
Ryan Thomas Hopper, ryan.t.hopper@gmail.com
Ryan Thomas Hopper, thomasm@gtlaw.com
STEVEN JEFFREY BRODIE, sbrodie@carltonfields.com
STEVEN JEFFREY BRODIE, ldelpino@carltonfields.com
Scott Andrew Hiaasen, shiaasen@coffeyburlington.com
Scott Andrew Hiaasen, lperez@coffeyburlington.com
Scott Andrew Hiaasen, service@coffeyburlington.com
Scott D. Rembold, srembold@therhlawfirm.com
Scott D. Rembold, courtdocs@therhlawfirm.com
Sergio L Mendez, sergio@mendezandmendezlaw.com
Sergio L Mendez, service@mendezandmendezlaw.com
Sergio L Mendez, lorena@mendezandmendezlaw.com
Seth M Lehrman, staff.efile@epllc.com
Seth M Lehrman, seth@epllc.com
Seth M Lehrman, iris@epllc.com
Seth M Schimmel, seth.schimmel@phelps.com
Seth M Schimmel, yolanda.vazquez@phelps.com
Seth M Schimmel, nicole.marsade@phelps.com
Shannon Lyn Nunez del Prado, sdelprado@pwwdlawfirm.com

Stuart Z Grossman, szg@grossmanroth.com
Stuart Z Grossman, lka@grossmanroth.com
Tal J Lifshitz, tj1@kttlaw.com
Tal J Lifshitz, ya@kttlaw.com
Tal J Lifshitz, fsr@kttlaw.com
Tal J. Lifshitz, tj1@kttlaw.com
Tal J. Lifshitz, ya@kttlaw.com
Thomas A. Robes, Trobes@robeslawgroup.com
Thomas A. Robes, jbuchko@robeslawgroup.com
Thomas A. Robes, dmarie@robeslawgroup.com
Todd Romano, Todd@RomanolawGroup.com
Valerie Shea, vshea@goldbergsegalla.com
Wanda Monteverde, monteverdew@kleinpark.com
William F. Merlin Jr, cmerlin@merlinlawgroup.com
William F. Merlin Jr, ssmith@merlinlawgroup.com
William F. Merlin Jr, trodriguez@merlinlawgroup.com
William J Tinsley Jr., william.tinsley@phelps.com
William J Tinsley Jr., yolanda.vazquez@phelps.com
William P. Mulligan, wpm@grossmanroth.com
William P. Mulligan, lka@grossmanroth.com
Yechezkel Rodal, chezky@forthepeople.com
Yechezkel Rodal, rmongeluzzi@smbb.com
Yechezkel Rodal, jgoodman@smbb.com
Yechezkel Rodal, chezky@forthepeople.com
Yitzhak Levin, ylevin@levinlitigation.com
Yitzhak Levin, service@levinlitigation.com
Yummy Marrero, Ymarrero@gabemullen.com

Physically Served: