

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY,
FLORIDA
COMPLEX BUSINESS LITIGATION
DIVISION
CASE NO: 2021-015089-CA-01
SECTION: CA43
JUDGE: MICHAEL HANZMAN

In re:

Champlain Towers South Collapse Litigation

**NOTICE OF FILING PASCALE BONNEFOY, as Personal Representative of the ESTATE OF
CLAUDIO BONNEFOY AND DULCE OBIAS-MANNO and FEDERICO MANNO as Co-TRUSTEE
OF CLAUDIO BONNEFOY TRUST's OBJECTION TO THE "ALLOCATION SETTLEMENT
AGREEMENT"**

NOTICE IS HEREBY GIVEN that undersigned counsel hereby files PASCALE BONNEFOY, as Personal Representative of the ESTATE OF CLAUDIO BONNEFOY AND DULCE OBIAS-MANNO and FEDERICO MANNO as Co-TRUSTEE OF CLAUDIO BONNEFOY TRUST's Objection to the "Allocation Settlement Agreement" that was preliminarily approved by the Court in an Order dated March 6, 2022.

Dated: March 23, 2022

Respectfully submitted,

KAREN B. PARKER, P.A.

Co-Counsel for Plaintiff
9100 So. Dadeland Blvd., Suite 514
Miami, Florida 33156
Tel.: (305) 400-9149

By: /s/ *Karen B. Parker*

KAREN B. PARKER, ESQ.

FBN: 54482

kparker@kbparkerlaw.com

fmartinez@kbparkerlaw.com

ebacker@kbparkerlaw.com

PATINO & ASSOCIATES, P.A.

Co-Counsel for Plaintiff
113 Almeria Avenue
Coral Gables, Florida 33134
Phone: (305) 443-6163
Fax: (305) 443-5635

Email: service@patinolaw.com

By: /s/ *Ralph G. Patino*

RALPH G. PATINO, ESQ.

Fla. Bar No.: 768881

ALISON E. PATINO, ESQ.

Fla. Bar No.: 1000389

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 23, 2022, I electronically filed the forgoing with the Clerk of the Court using the Court's electronic filing portal. I also certify that the foregoing is being electronically served this day on all counsel of record via transmission of Notices of Electronic Filing generated by the Court's electronic filing portal.

By: /s/ Karen B. Parker
Karen B. Parker, Esq.
Co-Counsel for Plaintiff Herskowitz

EXHIBIT A



9100 S. Dadeland Boulevard, Datan One, Suite 514
Miami, Florida 33156
(305) 400-9149 or (305) 343-8339
kparker@kbparkerlaw.com

March 23, 2022

Michael I. Goldberg, Court-Appointed Receiver
Champlain Towers South Condominium Association, Inc.
201 East Las Olas Boulevard, Suite 1800
Fort Lauderdale, Florida 33301.

Clerk of the Circuit Court
Miami-Dade County Courthouse
73 West Flagler Street, Room 133
Miami, Florida 33130
305-275-1155

In re: Champlain Towers South Collapse Litigation
In the Circuit Court of the 11th Judicial Circuit In and for Miami-Dade County,
Florida Case No.: 2021-015089-CA-01

**Champlain Towers South (CTS) Unit Owners Objection to “Preliminary Approved –
Allocation Settlement Agreement”**

Dear Mr. Goldberg and Clerk of the Circuit Court:

PASCALE BONNEFOY, as Personal Representative of the ESTATE OF CLAUDIO BONNEFOY AND DULCE OBIAS-MANNO and FEDERICO MANNO as Co-TRUSTEE OF CLAUDIO BONNEFOY TRUST, the owner of Apartment 1001 of the Champlain Towers South (CTS) objects to the preliminary approved Allocation Settlement Agreement.

Sincerely,

Karen B. Parker

KAREN B. PARKER, ESQ.

cc: Pasquale Bonnefoy; Dulce Obias-Manno; Federico Manno