

**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 DULCE OBIAS-MANNO, as Personal
Representative of the ESTATE OF MARIA S. OBIAS-BONNEFOY AND
DULCE OBIAS-MANNO as TRUSTEE OF MARIA S. OBIAS-BONNEFOY TRUST's
OBJECTION TO THE "ALLOCATION SETTLEMENT AGREEMENT"**

NOTICE IS HEREBY GIVEN that undersigned counsel hereby files DULCE OBIAS-MANNO, as Personal Representative of the ESTATE OF MARIA S. OBIAS-BONNEFOY and DULCE OBIAS-MANNO as TRUSTEE OF MARIA S. OBIAS-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

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By: /s/ *Karen B. Parker*

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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



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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:

DULCE OBIAS-MANNO, as Personal Representative of the ESTATE OF MARIA S. OBIAS-BONNEFOY AND DULCE OBIAS-MANNO as TRUSTEE OF MARIA S. OBIAS-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: Dulce Obias-Manno