IN THE CIRCUIT COURT OF THE 11<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

COMPLEX BUSINESS DIVISION CASE NO. 2021-015089-CA-01

IN RE:

CHAMPLAIN TOWER SOUTH COLLAPSE LITIGATIOIN

## NON-PARTY PHILADELPHIA INDEMNITY INSURANCE COMPANY'S NOTICE OF WAIVER

Pursuant to the Court's Modified Order Requiring Mediation and Staying Discovery as to Mediating Defendants, entered April 6, 2022, Philadelphia Indemnity Insurance Company gives notice that it has waived all rights of subrogation it might possess against 8701 Collins Development, LLC; Terra Group, LLC; Terra World Investments, LLC; and John Moriarty & Associates of Florida, Inc.

## **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that, on **April 11, 2022**, a true and correct copy of the foregoing document was filed with the Florida e-Courts Portal, which will serve a copy of the foregoing document on all counsel or parties of record.

## **GOLDBERG SEGALLA LLP**

By:

/s/ Valerie Shea Valerie Shea, Esq. Florida Bar No. 436800 Dustin C. Blumenthal, Esq. Florida Bar No. 083799 801 Brickell Avenue, 8th Floor Miami, Florida 33131 Tel: (786) 814-4800 Fax: (786) 814-4899 Counsel for Non-Party, Philadelphia Indemnity Insurance Company