

**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

**GREAT AMERICAN INSURANCE COMPANY'S
NOTICE OF WAIVING SUBROGATION RIGHTS**

PLEASE TAKE NOTICE that pursuant to the Court's Modified Order Requiring Mediation and Staying Discovery as to Mediating Defendants, dated April 6, 2022, Great American Insurance Company hereby provides notice that it waives 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., and any other persons or entities, in connection with its payment under commercial property policy number MAC E658359 00 00, as detailed in the Court's August 12, 2021 Consent Order. As previously stated in its January 19, 2022 letter to counsel for the Receiver, Great American made the decision not to pursue subrogation as an accommodation to its insured, Champlain Towers South Condominium Association, Inc., and all of the victims of this tragedy.

Dated: April 12, 2022

Respectfully submitted,

MOUND COTTON WOLLAN & GREENGRASS LLP

By: /s/ William D. Wilson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of April, 2022, a true and correct copy of the foregoing document was filed via the Florida Courts e-Filing Portal system, which will serve a copy of the foregoing document on all counsel or parties of record.

/s/ William D. Wilson
William D. Wilson, Esq.