

**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.

**RECEIVER'S MOTION TO SET HEARING WITH RESPECT TO
LETTER RECEIVED FROM UNIT OWNERS IN CONNECTION
WITH ALLOCATION SETTLEMENT AGREEMENT**

Michael I. Goldberg (the "Receiver"), pursuant to Rule 4 of the Complex Business Litigation Rules, files this Motion To Set Hearing With Respect To Letter Received From Unit Owners In Connection With Allocation Settlement Agreement. In support of this motion, the Receiver states as follows:

1. On Sunday, May 15, 2022, the Receiver received the letter attached hereto as Exhibit "A" from numerous Unit Owners. In short, the Unit Owners believe that in light of the fact that the settlement with third parties is much greater than what all parties in interest anticipated at the time the Allocation Settlement Agreement was entered into, the Court should consider increasing the payment to Unit Owners under the Allocation Settlement Agreement previously approved by this Court.

2. The Receiver believes that he has an obligation to bring this letter to the Court's attention and does so through this motion.

WHEREFORE, the Receiver respectfully requests the Court to set a hearing to consider the Unit Owners' position and to grant such other relief as is just and proper.

Dated: May 16, 2022

Respectfully submitted,

/s/ Michael I. Goldberg
Michael I. Goldberg, Esq.
Florida Bar Number: 886602
AKERMAN LLP
201 E. Las Olas Boulevard, Suite 1800
Fort Lauderdale, Florida 33301-2999
Tel: (954) 463-2700
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Court-Appointed Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 16, 2022, a copy of the foregoing was electronically filed with the Clerk of Court by using the Florida Courts E-Filing Portal and a copy of same was furnished to all counsel of record through the Florida Court's E-Filing Portal.

By: s/ Michael I. Goldberg
Michael I. Goldberg

EXHIBIT "A"

May 12, 2022,

Michael I. Goldberg, Receiver
Receiver for Champlain Towers South Condominium Association, Inc.
The Main Las Olas
201 E. Las Olas Blvd., Suite 1800
Ft. Lauderdale, Florida 33301

Dear Mr. Goldberg:

Just like many parties within the private and public sector, we received this week's news with tremendous surprise and a combination of mixed feelings as we approach the end of this painful process.

We are thrilled that the recent settlement for the wrongful death class exceeded everyone's expectations, but precisely because of that, we believe that given the size of the settlement, it merits a reconsideration of the Allocation Settlement Agreement as we too have been significantly hurt by this tragedy and need to rebuild our lives.

To that end, we would greatly appreciate it if you could file something with the Court asking the Judge to reconsider the amount of money allocated to the Unit Owners under the Allocation Settlement Agreement.

Thank you for your consideration,

Deborah Soriano, Deborah Soriano Revocable Living Trust Apt. 1105
Matilde Zaidenweber, Zababa Champ LLC Apt 112
Mayra, Olga and Armando Santana Apt. 711
Alfredo, Marian and Michael Lopez Apt. 605
Debra and Neal Godt Apt. 709
Alexandre and Fabiana Santos Apt. Apt 1202 (PH-2)
Real and Denise Pare Apt. 201
Iliana Monteagudo Apt 611
Moshe Candiotti Apt. 407
Lynn and Randy Rose Apt 1103
Maria and Jorge Zardoya, ZYR LLC Apt 1209 (PH-9)
Daniela Silva, apt 408
Mayra Cruz Apt. 1205 (PH-5)
Diane and Howard Cole Apt. 301
Ellen and Max Friedman Apt 1102
Jose Ramon Aguilar Apt. 810
Jacqueline Rivadeneira and Jacqueline Decker Apt 1204 (PH-4)
Jay Miller Apt 303
Lilian and Graham Fish Apt 210
Marcelo and Rosanna Pena Apt 708
Leopoldo, Raquel, and Ricardo Grauer, Apt 507
Julio Alonso Apt 508

Kenneth and Magaly Mayhew Apt 503
La Comparsita LLC Apt 802
Ricardo Abuawad Apt 612
Bertha Valencia, Bertha Balseca, Elmaber, LLC Apt 606
Susana Rodriguez Apt 607
Rodrigo Selem Cache Apt 803
Diselca Investment Corp Apt 306
Zulia Taub Apt 506
Steven Rosenthal Apt 705
Esther Gorfinkel Apt 509
Manuel Drezner Apt 1009
Bernd Nufer and Parnell M. Bradley-Nufer Apt 1007
Susan and John Turis Apt 409
Carlos E. Fernandez G. (Lomak Investments LLC) Apt 307
Emilia Mattei Apt 1005
Lidia Marina Aleman and Jorge Alberto Hernandez Apt 1206 (PH-6)
Adalberto and Nieves Aguero Apt 1106
Joel and Sharon Waisglass (Champlain Towers Property Trust/Waisglass) Apt 1012
Gary and Camila Sterba Apt. 1004
Ann Caserta and Renee Casserta Apt 405
Mary McGraw and Steve Dixon Apt 505
Oren Cytrynbaum 905
Odex Capital Investment Corp 906
Cristina Schwarz Apt 608
Paolo and Anastasiya Longobardi Apt. 309
Susana Alvarez Apt 1006
Luis Pelaez and Maray Ortiz, Unit 610