

**IN THE CIRCUIT COURT OF THE 11TH 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**

NOTICE OF FILING PROPOSED PUBLICATION NOTICE

Pursuant to the proposed notice plan detailed in Article 9 of the In Re: Champlain Towers South Collapse Litigation Class Action Settlement Agreement (hereinafter, the “Settlement Agreement”), attached as Exhibit 1 to the Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement and for Certification of Settlement Class dated May 27, 2022, Undersigned Counsel hereby provides this notice of filing the proposed Publication Notice. A copy of the Notice is attached as Exhibit 1 hereto.

Respectfully submitted May 28, 2022

/s/ Adam M. Moskowitz
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Damage Track Co-Lead Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been filed on May 28, 2022, with the Clerk of the Court by using the Florida Courts E-Filing Portal, which will send a Notice of Electronic Filing on all counsel of record.

/s/ Adam M. Moskowitz
Adam M. Moskowitz

Exhibit 1

IF YOU WERE A VICTIM OF THE CHAMPLAIN TOWERS SOUTH COLLAPSE ON JUNE 24, 2021 YOU COULD OBTAIN CASH PAYMENTS FROM A CLASS ACTION SETTLEMENT

WHAT IS THIS LAWSUIT ABOUT? The Champlain Towers South building partially collapsed on June 24, 2021, and the remaining structure was later demolished (the “CTS Collapse”). The CTS Collapse caused the death of 98 individuals, other personal injuries, and substantial property damage. As a result of the CTS Collapse, certain representatives of those who perished and other individuals who lost their homes and belongings filed lawsuits in the Court. These numerous actions were consolidated by Court order into the Lawsuit, i.e., a single class action. This class action was settled. The Settlement is between the Settlement Class (as defined below), Michael I. Goldberg, in his capacity as Court-appointed receiver in the Lawsuit (the “Receiver”), Champlain Towers South Condominium Association, Inc. (the “CTSCA”), and the Settling Parties (as defined in the Preamble of the Settlement Agreement located at www.ctsreceivership.com). Your rights may be affected by this class action lawsuit entitled *In Re: Champlain Towers South Collapse Litigation* (Case No. 2021-015089-CA-01) (Fla. 11th Cir. Ct.) (the “Lawsuit”), presently pending in the Eleventh Judicial Circuit in and for Miami-Dade County, Florida. The Court has preliminarily approved a Settlement Agreement that provides for settlement of this lawsuit with Settling Parties, and has scheduled a hearing on the fairness, adequacy, and reasonableness of the proposed settlement.

WHO IS IN THE SETTLEMENT CLASS? All (a) Unit Owners, (b) Invitees, (c) Residents, (d) persons who died or sustained any personal injury (including, without limitation, emotional distress) as a result of the CTS Collapse, (e) persons or entities who suffered a loss of, or damage to, real property or personal property, or suffered other economic loss, as a result of the CTS Collapse, (f) Representative Claimants, and (g) Derivative Claimants. Derivative Claimants and Representative Claimants are defined in Sections 2.1.60 and 2.1.119, respectively, of the Settlement Agreement located at www.ctsreceivership.com.

WHAT ARE THE PROPOSED SETTLEMENT TERMS? Under the proposed Settlement, the Settling Parties have agreed to the creation of a fund (the “Settlement Fund”), which totals **approximately \$1,021,199,000.00**, to make cash payments to the Settlement Class Members (who are awarded damages through the Court ordered Claims Administration Procedure and to pay for costs of the litigation and any fees to be awarded). For information on the claims procedure, please review Section 8 of the Detailed Notice, which is located at www.ctsreceivership.com. Claim Forms are available by going to www.ctsreceivership.com, or by calling (954) 331-4190. Included with the Claim Forms are instructions on how to submit them.

WHAT IS THE SETTLEMENT APPROVAL PROCEDURE? The Court has scheduled a fairness hearing on June 23, 2022, at 9:00 a.m. in Courtroom 9-1 of the Miami-Dade Children’s Courthouse, located at 155 NW 3rd St, Miami, Florida 33128 (the “Fairness Hearing”). The Fairness Hearing will address whether the proposed Settlement is fair, reasonable, and adequate and whether the Court should approve it. Also, at the fairness hearing, the Court will decide Class Counsel’s request for attorneys’ fees and costs. **The Fairness Hearing date is subject to change. If the Fairness Hearing date or time changes, the new date or time will be posted at www.ctsreceivership.com.** Although you may attend this hearing in person or through your own attorney, you are not required to do so. If you are a member of the Settlement Class, and choose to remain in the class, you need not take any action, but must file a Claim Form to receive any of the cash payments. If you wish to exclude yourself from the settlement, you may opt-out by submitting an opt-out request, on or before June 16, 2022, which complies with Section 9.2 of the Settlement Agreement and Section 9 of the Detailed Notice (both located at www.ctsreceivership.com). If you choose to remain in the Settlement Class and you wish to comment in opposition to the proposed settlement, an objection in appropriate format must be filed in compliance with Section 9.3 of the Settlement Agreement and Section 10 of the Detailed Notice on or before June 16, 2022. Further instructions on objection and opt-out procedures may be obtained by visiting www.ctsreceivership.com or calling (954) 331-4190.

HOW CAN I OBTAIN ADDITIONAL INFORMATION ABOUT THE PROPOSED SETTLEMENT? You may obtain a copy of the Settlement Agreement and the settlement approval motions and orders by going to www.ctsreceivership.com or calling (954) 331-4190. All questions you may have concerning the Settlement

Agreement or this Notice should be directed to Class Counsel listed in the Detailed Notice. Please DO NOT contact the Court.