

**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 EXTEND DEADLINES FOR  
VICTIMS AND/OR PERSONAL REPRESENTATIVES TO VIEW  
PHOTOGRAPHS AND SUBMIT CLAIMS FOR PERSONAL PROPERTY ITEMS**

Michael I. Goldberg (the "Receiver"), pursuant to Rule 4 of the Complex Business Litigation Rules, seeks entry of an Order extending the deadline through August 1, 2022 for victims and/or Personal Representatives to view the photographs of recovered personal property items on the Receiver's website and submit their claims to the Receiver.

1. On October 10, 2021, this Court entered an Order Approving Protocol for Processing and Returning Personal Property Items. In pertinent part, the Order provides that with respect to photographs of the items uploaded to the Receiver's website for viewing and/or claiming by victims and/or Personal Representatives:

The photographs will be accessible for 30 days. During the 30 day period, victims and/or their Personal Representatives will be able to submit claims to the Receiver for personal property items.

2. The website went live on or about April 11, 2022 at which point the Receiver sent notification to the victims and Personal Representatives, to the extent possible, along with secure login information. The current deadline for submission of claims is June 10, 2022.

3. The Receiver has spoken with several victims' families and the County who agree that additional time, through August 1, 2022, to review the photographs and make claims is

warranted given additional items are being listed, numerous individuals have not yet logged on and victims and/or Personal Representatives have been dealing with the class action settlement and the settlement claims process. Accordingly, the Receiver requests that the protocol approved in the October 10, 2021 be extended so that victims and/or Personal Representatives have until August 1, 2022 to view the photographs and submit their claims to the Receiver.

**WHEREFORE**, the Receiver respectfully requests that the Court grant this Motion and extend the above-referenced deadlines set forth in the initial October 10, 2021 Order to August 1, 2022.

Respectfully submitted,

/s/ Michael I. Goldberg

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*Court-Appointed Receiver*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 7, 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