

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

COMPLEX BUSINESS
LITIGATION DIVISION

CASE NO: 2021-015089-CA-01
SECTION: CA43
JUDGE: MICHAEL HANZMAN

In re:
Champlain Towers South Collapse Litigation

CALIL LAW P.A.'S NOTICE OF FILING

COMES NOW, Calil Law, P.A., and pursuant to the Florida Rules of Civil Procedure,
hereby file for the Court's record the following:

1. Declaration of Jorge A. Calil Filed on Behalf of Calil Law, P.A. in Support of Its Motion for Approval of Payment of Attorneys' Fees and Litigation Expenses dated June 17, 2022.

CERTIFICATE OF SERVICE

We hereby certify that on **June 17, 2022**, we electronically filed the foregoing with the Clerk of Court via the Florida E-Portal system, which will send notification of such filing to all attorneys of counsel.

CALIL LAW, P.A.
Counsel for Plaintiff
2333 Brickell Avenue, Suite A-1
Miami, FL 33129
Tel: 305-373-5529
Fax: 305-373-3307
Email: jorge@jcalillaw.com
Assistant: Jeannie.calillaw@gmail.com

/s/ Jorge A. Calil, Esq.

JORGE A. CALIL, ESQ.
Florida Bar No. 685321

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

COMPLEX BUSINESS
LITIGATION DIVISION

CASE NO: 2021-015089-CA-01
SECTION: CA43
JUDGE: MICHAEL HANZMAN

In re:
Champlain Towers South Collapse Litigation

**DECLARATION OF JORGE A. CALIL FILED ON BEHALF OF CALIL LAW, P.A. IN
SUPPORT OF MOTION FOR APPROVAL OF PAYMENT OF ATTORNEYS' FEES**

I, JORGE A. CALIL, do hereby declare and state as follows:

1. I am the founder and owner of the law firm of Calil Law P.A. ("Calil Law"). I submit this declaration in support of my firm's application for an award of attorneys' fees in connection with the services we rendered in the above-entitled action.

2. I was retained by Ms. Susana Alvarez and I filed a lawsuit against Champlain Towers asking for damages for her economic loss as an owner of her condominium unit and for Negligent Infliction of Emotional Distress.

3. As part of my role in this litigation, I assisted my client by attending all of the scheduled hearings and speaking to the other attorneys which benefitted the Plaintiff. How beneficial was the Declarant's work is left to this Honorable Court's assessment.

4. The information in this declaration regarding my time and that of my firm is documented and reflected in time printouts and supporting documentation prepared and maintained by my Firm in the ordinary course of our business. I am the partner who oversaw the day-to-day activities in this litigation. I have reviewed the printouts (and backup

CALIL LAW P.A.

2333 Brickell Avenue, Suite A-1, Miami, FL 33129

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documentation where necessary or appropriate) in connection with the preparation of this Declaration. The purpose of this review was to confirm to the best of my ability the accuracy of the entries as well as the necessity for, and reasonableness of, the time committed to this litigation, including the elimination of time that I considered duplicative of other work or matters not necessarily directed by the Plaintiff, Susana Alvarez. As a result of this review and any adjustments made, I believe that the time reflected in Calil Law's lodestar calculation for which payment is sought as set forth in this Declaration is reasonable in amount and was necessary for the effective and efficient prosecution and resolution of the litigation.

5. The number of reduced hours spent on this litigation by my firm is **81.5** hours. A breakdown of the lodestar is provided in **Exhibit A**. The lodestar amount for attorney time based on the firm's current rates is **\$46,875.00**. The hourly rates shown in **Exhibit A** are the usual and customary rates set by the firm for this attorney. The undersigned did not charge for paralegal, consultations with Plaintiff, and/or paraprofessional time. The chart set forth as **Exhibit A** was prepared from contemporaneous daily time records of the Firm.

6. The identification and background of my firm and its participating attorneys is attached hereto as **Exhibit B**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th of June, 2022 at Miami, Florida.

CALIL LAW, P.A.
Counsel for Plaintiff
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Tel: 305-373-5529
Fax: 305-373-3307
Email: jorge@jcalillaw.com
Assistant: Jeannie.calillaw@gmail.com

/s/ Jorge A. Calil, Esq.

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Florida Bar No. 685321

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INVOICE

Number	5
Issue Date	6/16/2022
Due Date	7/16/2022

Bill To:

Susana Alvarez

SUSANA ALVAREZ v CHAMPLAIN TOWERS

Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Draft/revise 6/30/2021 DRAFT COMPLAINT FOR DAMAGES	Jorge A. Calil	\$750.00	5.50	\$4,125.00
Appear for/attend 7/21/2021 HEARING ON STATUS OF FUNDS AND INSURERS	Jorge A. Calil	\$750.00	1.00	\$750.00
Time 8/10/2021 MEETING Florida State Senator Jason Pizzo invites you to receive an update from the court-appointed Receiver and other professionals via Zoom on Tuesday, August 10, 2021 at 6:30 P.M. The meeting topics will include and update from charitable organizations, pro bono attorneys and general Q&A. Please see the Zoom details below: Join Zoom Meeting https://us06web.zoom.us/j/85280717429?pwd=R285TXNKWEIVc3ZhRUdRK2VDRS9aQT09MeetingID:85280717429Passcode:033649	Jorge A. Calil	\$750.00	2.50	\$1,875.00
Time 10/13/2021 PHONE CONFERENCE WITH DORTA	Jorge A. Calil	\$750.00	2.00	\$1,500.00
HEARINGS 12/22/2021 Evidentiary Hearing The Court has been advised that the parties, despite their best efforts, have been unable to agree upon a joint testing protocol, and that an evidentiary hearing is needed to address this issue. Zoom Meeting ID: 96302974644 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/96302974644	Jorge A. Calil	\$750.00	1.00	\$750.00

EXHIBIT

A

Time Entries	Billed By	Rate	Hours	Sub
HEARINGS 3/9/2022 HEARING - Status Conf Category: Special SetsMotion: Status ConferenceScheduled Date and Time: 03/09/22 2:00:00 PMScheduled Before: Michael HanzmanCase Number: 2021- 015089-CA-01Style: In Re: Champlain Towers South Collapse Litigation Zoom Meeting ID: 93137720591Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/93137720591	Jorge A. Calil	\$750.00	1.00	\$750.00
HEARINGS 4/5/2022 SPECIAL SET HEARING regarding the proposed "Modified Order Requiring Mediation and Staying Discovery as to Mediating Defendants." Zoom Meeting ID: 92011461118Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/92011461118	Jorge A. Calil	\$750.00	1.00	\$750.00
HEARINGS 5/12/2022 STATUS CONFERENCE Zoom Meeting ID: 95079240468Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/95079240468	Jorge A. Calil	\$750.00	1.00	\$750.00
HEARINGS 5/18/2022 ZOOM HEARING https://zoom.us/j/97742599997 https://zoom.us/j/97742599997	Jorge A. Calil	\$750.00	1.00	\$750.00
HEARINGS 5/24/2022 HEARING https://zoom.us/j/94844413782 https://zoom.us/j/94844413782	Jorge A. Calil	\$750.00	1.00	\$750.00
Time Entries Total			17.00	\$12,750.00

Total for SUSANA ALVAREZ v CHAMPLAIN TOWERS	\$12,750.00
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Champlain Towers

Time Entries

Time Entries	Billed By	Rate	Hours
HEARINGS 7/14/2021 SPECIAL SET HEARING IN PERSON- ROOM 416	Jorge A. Calil	\$750.00	1.00
HEARINGS 7/21/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00

Time Entries	Billed By	Rate	Hours
Communicate (with client) 7/21/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 8/4/2021 SPECIAL SET HEARING- ZOOM ONLY https://zoom.us/j/93093784888	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 8/10/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 8/11/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
HEARINGS 8/18/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 8/19/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 9/1/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 9/2/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 9/10/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
HEARINGS 9/23/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 9/24/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 9/30/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
HEARINGS 10/6/2021 SPECUAL SET HEARING	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 10/7/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00

Time Entries	Billed By	Rate	Hours
HEARINGS 10/20/2021 SPECIAL SET HEARING Category: Special SetsMotion: Status ConferenceScheduled Date and Time: 10/20/21 9:00:00 AMScheduled Before: Michael HanzmanCase Number: 2021-015089-CA-01Style: In Re: Champlain Towers South Collapse LitigationZoom Meeting ID: 91873370729Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/91873370729	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 10/21/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 11/3/2021 SPECIAL SET HEARING Zoom Meeting ID: 97849971767Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/97849971767	Jorge A. Calil	\$750.00	1.00
HEARINGS 11/4/2021 SPECIAL SET HEARING - DEPOS Join Zoom Meeting https://zoom.us/j/97987757746 Meeting ID: 979 8775 7746One tap mobile+17866351003,,97987757746# US (Miami)	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 11/5/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
Appear for/attend 11/10/2021 DEPO OF KENNETH DIREKTOR Proceeding Details:Meeting ID: 97272958212Meeting Passcode (if needed): 7637085Case Name: MANUEL DREZNER V. CHAMPLAIN TOWERS SOUTH CONDOMINIUM ASSOCIATION INCClaim No. Witness Name: Kenneth Direktor, Esq.Date: 11/10/2021Time and Time Zone: 09:00 AM EasternEsquire Job No: J7637085How to Join the Proceeding:Click here to join the meeting: https://esquiresolutions.zoom.us/j/97272958212? pwd=T25GUhFyaUlxjd5SnJheG5NTk1KQT09 Joining the Proceeding by phone or room system:+1 669 900 6833 or +1 346 248 7799 US TollInternational numbers available: https://esquiresolutions.zoom.us/j/97272958212? If joining from an H.323/SIP room system:Dial: 162.255.37.11 (US West) or 162.255.36.11 (US East)	Jorge A. Calil	\$750.00	7.00
HEARINGS 11/17/2021 SPECIAL SET HEARING- LIVE AND ZOOM Zoom Meeting ID: 92965260336Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/92965260336	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 11/17/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 12/1/2021 SPECIAL SET HEARING Zoom Meeting ID: 96354807530Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/96354807530	Jorge A. Calil	\$750.00	1.00
Appear for/attend 12/7/2021 DEPO OF PREMIERE FIRE ALARMS & INTEGRATION SYSTEMS	Jorge A. Calil	\$750.00	2.50

Time Entries	Billed By	Rate	Hours
Communicate (with client) 12/8/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 12/13/2021 Litigation Status Hearing - Court Appointed Dear In re: Champlain Towers South Collapse Litigation Class Members: On December 13, 2021, at 10:00am ET, Court appointed class action counsel will host a Zoom meeting to discuss the status of the litigation. This meeting is open to all Champlain Towers South Litigation class members, which includes all those with claims for property damage, personal injury, and wrongful death. During this meeting we hope to answer many of your questions about the case, but please note that we will not be able to provide any individual legal advice. Also, our communications during this conference will be subject to the attorney-client privilege. We look forward to speaking with you about the litigation. Sincerely, Harley S. Tropin Rachel W. Furst Join Zoom Meeting https://us06web.zoom.us/j/84856006312?pwd=WU1CNURPWkFsdkiHZDdIMUt5NUJLdz09 Meeting ID: 848 5600 6312 Passcode: 459858 One tap mobile +17866351003,,84856006312#,,,*,459858# US (Miami) +16465588656,,84856006312#,,,*,459858# US (New York)	Jorge A. Calil	\$750.00	1.00
HEARINGS 12/15/2021 SPECUAL SET HEARING Zoom Meeting ID: 92612485028Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/92612485028	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 12/16/2021 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 1/5/2022 SPECUAL SET HEARING Zoom Meeting ID: 97063974591Zoom Join Url: https://zoom.us/j/97063974591	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 1/5/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 1/14/2022 SPECUAL SET HEARING Zoom Meeting ID: 94504028383Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/94504028383	Jorge A. Calil	\$750.00	1.00
HEARINGS 1/21/2022 SPECUAL SET HEARING Zoom Meeting ID: 91329734009Zoom Dial In Number: +1 786-635-1003Zoom Link: https://zoom.us/j/91329734009	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 1/21/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00

Time Entries	Billed By	Rate	Hours
HEARINGS 1/28/2022 SPECIAL SET HEARING Zoom Meeting ID: 95495832317 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/95495832317 https://zoom.us/j/95495832317 https://zoom.us/j/95495832317	Jorge A. Calil	\$750.00	1.00
HEARINGS 2/4/2022 SPECIAL SET HEARING Zoom Meeting ID: 93809826888 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/93809826888	Jorge A. Calil	\$750.00	1.00
MEDIATION 2/8/2022 Mediation	Jorge A. Calil	\$750.00	3.00
HEARINGS 2/11/2022 SPECIAL SET HEARING Join Zoom Meeting https://zoom.us/j/91073046202 Meeting ID: 910 7304 6202	Jorge A. Calil	\$750.00	1.00
MEDIATION 2/21/2022 2nd MEDIATION	Jorge A. Calil	\$750.00	4.00
Communicate (with client) 2/21/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 2/23/2022 SPECIAL SET HEARING Zoom Meeting ID: 97187555290 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/97187555290	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 3/10/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 3/30/2022 HEARING - Status Conference and Final Approval Hearing re: Allocation Settlement Agreement Zoom Meeting ID: 94602309290 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/94602309290	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 3/31/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
Communicate (with client) 4/18/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00

Time Entries	Billed By	Rate	Hours
HEARINGS 4/18/2022 HEARING - Mtn for Approval to Access Property EMERGENCY MOTION FOR COURT APPROVAL OF ACCESS TO PROPERTY CONTROLLED BY DEFENDANT 8701 COLLINS AVENUE CONDOMINIUM ASSOCIATION, INC. FOR THE PURPOSE OF PERFORMING JOINT TESTING PROTOCOL TESTING AND, ALTERNATIVELY, MOTION TO SHORTEN TIME TO RESPOND TO REQUEST FOR ENTRY UPON LAND FOR INSPECTION Zoom Meeting ID: 97632624698 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/97632624698	Jorge A. Calil	\$750.00	1.00
HEARINGS 5/2/2022 HEARING - Status Conference Mtn for Approval and Issuance of Claim Form Zoom Meeting ID: 92013801586 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/92013801586	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 5/2/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
HEARINGS 5/4/2022 HEARING - Status Conference - Motion: Receivers Expedited Motion for Entry of Order Approving Amendment to (A) Purchase and Sale Agreement and (B) Bidding and Sale Procedures Join Zoom Meeting https://zoom.us/j/92040889370 Meeting ID: 920 4088 9370 One tap mobile +17866351003,,92040889370# US (Miami) +16465588656,,92040889370# US (New York)	Jorge A. Calil	\$750.00	1.00
HEARINGS 5/11/2022 HEARING - SS Status Conference and Motion for Approval and Issuance of Claims Forms Zoom Meeting ID: 92227930732 Zoom Dial In Number: +1 786-635-1003 Zoom Link: https://zoom.us/j/92227930732	Jorge A. Calil	\$750.00	1.00
Communicate (with client) 5/19/2022 Communication with Client: Case Status	Jorge A. Calil	\$0.00	1.00
Time Entries Total			64.50

Total for Champlain Towers

\$34,125.00

Total (USD)

\$46,875.00

Paid

\$0.00

Balance

\$46,875.00



Jorge A. Calil

Founder, The Law Offices of Jorge A. Calil, P.A.

Living in Miami for over 40 years has helped me gain a unique perspective on the challenges that are common in our community. My expertise as an attorney, coupled with real-life experience in many fields, qualifies me to help you navigate our complex legal system, no matter what your situation.

Background Information

I have a strong background, not only in the legal industry but also in a variety of other fields, having worked in such capacities as:

- Owner of Florida licensed roofing company
- Auditor for South East Bank
- Licensed Real Estate Broker
- County court bailiff
- Assistant State Attorney

My experience in a variety of industries helps me understand the legal solutions available to my clients, no matter what their situation.

Degrees and Qualifications

- Member of the Florida Bar
- Juris Doctorate from the Shepard Broad Law School at Nova Southeastern University
- Bachelor of Business Administration from Florida International University

EXHIBIT

B