

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 SECOND 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 October 3, 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 June 8, 2022, this Court entered an Order Granting the Receiver’s Motion to Extend Deadlines for Victims and/or Personal Representatives to View Photographs and Submit Claims for Personal Property Items. Accordingly, the deadlines initially set forth in the Court’s October 10, 2021 Order were extended to August 1, 2022.

2. The Receiver has spoken with many victims’ families who have requested additional time to view the website and make claims, particularly because they been dealing with the class action settlement and the settlement claims process.

3. It should be noted that Miami-Dade County has continued to find, decontaminate and photograph additional personal property, and the Receiver will be including photographs of those items on the website as part of a second claims process in the months ahead. The County also intends to conduct a final search of the rubble, using heavy equipment, and such search may yield additional personal property items. Those items will also be part of the second claim process.

Moreover, the County has undertaken, at its own expense, to decontaminate soft religious items (where possible), and the Receiver anticipates including those soft religious items as part of the second claims process.

4. Accordingly, with respect to items included on the Receiver's website to date, the Receiver requests that the protocol approved in the October 10, 2021, and previously extended to August 1, 2022, be extended to October 3, 2022 so that victims and/or Personal Representatives have sufficient time 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 October 3, 2022.

Respectfully submitted,

/s/ Michael I. Goldberg

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Court-Appointed Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 29, 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