

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT COURT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

IN RE: CHAMPLAIGN TOWERS
SOUTH COLLAPSE LITIGATION,

CLASS REPRESENTATION

CASE NO.: 2021-015089-CA-01

COMPLEX BUSINESS LITIGATION
DIVISION

Florida Bar No: 0008486

RENEWED MOTION TO GRANT AWARD OF ATTORNEYS FEES

COMES NOW Jonathan R. Friedland, Esq., of the law firm of Friedland | Carmona, PLLC., on behalf of SHAMOKA FURMAN and hereby files this Renewed Motion to Grant Award of Attorney's Fees and states the following:

1. The undersigned counsel was retained to represent Shamoka Furman, the security guard on duty at the Champlaign Towers premises on the evening of the collapse.
2. Significant work and time has been performed by undersigned counsel investigating, developing and assisting class counsel in prosecuting the negligence claim against Ms. Furman's employer, Securitas. Ms. Furman was a key witness in this case and undersigned counsel assisted the class in securing testimony and developing the case against Securitas.
3. The work performed was reasonable and necessary to prepare Ms. Furman's case against Securitas and this included all the hours outlined in the time sheets attached as Exhibit "A" to this motion. Counsel understands the Courts ruling that no contingency fee be taken by any lawyers assisting class members and is therefore making application to this Court for just the time spent assisting the class as a whole and benefitting the class with an eventual favorable resolution of the case against Securitas.
4. Undersigned counsel is not an appointed lawyer representing the class but was called on by class counsel to assist in handling the case against Securitas. Although the undersigned counsel also represents several wrongful death clients in addition to Ms. Furman, application for time reimbursement is ONLY being made on Ms. Furman's claim.
5. Attached as Exhibit "B" to this motion is counsel's curriculum vitae which outlines all experience counsel has in the field of Plaintiff's personal injury litigation and requests this Court to take these qualifications into account when setting a reasonable hourly rate.

WHEREFORE, Jonathan R. Friedland requests this honorable court to grant the motion to award attorneys' fees and costs and requests all other relief this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was emailed on this 28th day of June, 2022 to:

Hon. Michael Hanzman (mhanzman@jud11.flcourts.org)

Michael Goldberg (michael.goldberg@akerman.com)

Harley Tropin (hst@kttlaw.com)

Rachel Furst (rwf@grossmanroth.com)

Judd G. Rosen (jrosen@goldbergandrosen.com)

Ricardo M. Martínez-Cid (rmcid@podhurst.com)

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Fax: (305) 661-2001
Email: email@friedlandlawgroup.com

BY _____

Jonathan R. Friedland, Esq.



EXHIBIT

“A”

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT COURT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

IN RE: CHAMPLAIGN TOWERS
SOUTH COLLAPSE LITIGATIONIN RE:
CHAMPLAIGN TOWERS
SOUTH COLLAPSE LITIGATION,

CLASS REPRESENTATION

COMPLEX BUSINESS LITIGATION
DIVISION

CASE NO.: 2021-015089-CA-01

/ Florida Bar No: 0008486

**JONATHAN R. FRIEDLAND, ESQ. ITEMIZATION OF TIME OF COUNSEL FOR
SHAMOKA FURMAN, INDIVIDUAL PERSONAL INJURY CLAIMANT**

COMES NOW the undersigned counsel, Jonathan R. Friedland, and files this time sheet
in support of his time spent working on the file for the above referenced client:

1. June 25, 2021 – Meet with client in person and execute retainer. Answer all questions and explain scope of representation. **2.0 hours.**
2. June 26, 2021- Begin investigation into claim. Meet with investigator to try and gather information on the collapse and what occurred. Obtain work related information from client for Securitas, her employer. Begin downloading all media information on collapse. **2.5 hours.**
3. June 29, 2021- meet with client for second time. This time we meet with Jim Fee, workers compensation attorney, to gather information and see what injuries we are dealing with. Client gives us information on media trying to contact her and we try to deflect that for her. **3.0 hours.**
4. July 1, 2021- draft and review letters to Champlain Towers, Becker Law and Michael Goldberg advising of our firm's involvement and requesting insurance information.

Advise on preservation of evidence and making sure we are kept up to date on any class actions. **.5 hours.**

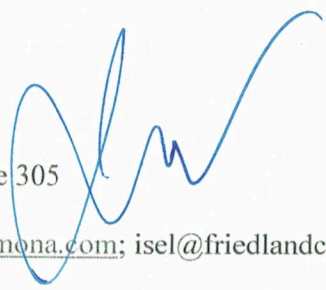
5. July 1, 2021- receive and review letter from Goldberg Segalla regarding their client Champlaign Towers. Contact Valeria Shea, Esquire to inquire about letter. **.3 hours.**
6. July 12, 2021- conversation with client regarding gathering more evidence of what happened. Provided with photos of injuries to leg, ankle and hip. Obtain information on Andre Vautrin, her District Manager. Try and contact Mr. Vautrin via phone. No response. **.75 hours.**
7. September 9, 2021- receive and review letter from Conroy, Simberg regarding investigation for Securitas and workers compensation involvement. Respond with information on case, what occurred, liability issues and potential for recovery. **.4 hours**
8. October 20, 2021- receive and review letter from Sedgwick on behalf of Securitas about investigation and facts of loss and liability. Provided itemization of medical and wages paid. **.2 hours.**
9. November 17, 2021- receive and review follow up letter from Sedgwick. Call and speak to Nicholas Anderson regarding claim and where investigation stands. **.25 hours.**
10. December 1, 2021- receive and review letter from Kozyak Tropin Law Firm regarding meeting on litigation set for December 13, 2021. **.1 hours.**
11. December 11, 2021 - receive and review release to review from Workers Compensation lawyer, Jim Fee. Review document to make sure all claims for negligence are preserved and that language is acceptable. Discuss with Mr. Fee via telephone. **1.0 hours.**
12. December 13, 2021- attend meeting regarding class action lawsuit. Advise counsel present that I represent the security guard on duty at time of collapse and if anyone needs

- my help, I am more than happy to assist. Meeting outlines lawsuit, parties and counsel involved. **1.5 hours.**
13. December 29, 2021- receive and review letter from Sedgwick and Nicholas Anderson about status of case and where the lien stands. Discuss trying to get cooperation from Securitas to aid in investigation of claim. **.3 hours.**
14. February 11, 2022- phone conversation with Nicholas Anderson at Sedgwick regarding getting a copy of class action lawsuit. **.2 hours.**
15. April 6, 2022- receive and review letter from the law firm of Moran Kidd regarding their involvement with Securitas and pending investigation into workman compensation case. **.1 hours.**
16. May 3, 2022- received call from client regarding a private investigator trying to contact her from Securitas. Discussed questions investigator was asking and provided number to call so I could follow up with investigator. Called investigator and left message to contact me with any information he/she needs. **.5 hours.**
17. May 5, 2022- phone conversation with Judd Rosen and Mustafa Dandaskly regarding assisting with client's testimony for case v Securitas. Discuss issues involved and what is needed. **.75 hours.**
18. May 5, 2022- phone conference with me and Shamoka Furman to go over what she knows and what her testimony would be regarding a "button" she didn't know about near her security desk on the evening of the collapse. Discussed her training with Securitas and what she knew and didn't know on the evening in question. Prepared her for statement via zoom video she would give to Mr. Rosen. **1.5 hours.**

19. May 5, 2022- attend Zoom conference with Mr. Rosen to provide unsworn video recorded statement of what she knew about training with Securitas and what she would have done if she was trained about the equipment available to her in the building. **.5 hours.**
20. May 11, 2022- phone conversation with follow up email from Nicholas Anderson at Sedgwick advising of \$46,451.67 lien and discussion on where investigation is into Securitas and class action case. **.2 hours**
21. May 12, 2022- receive and review approximately 45 pages of client's medical records from workman's compensation. Call and client and discuss her treatment. **1.0 hours.**
22. June 3, 2022- review class action claim forms with client and begin preliminary information gathering. Answer all questions and gather as many medical records as possible. **1.5 hours.**

Total time expended to date: 19.05 hours x \$700.00 per hour = \$13,335.00.

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Coral Gables, Florida 33146
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EXHIBIT

“B”

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CORAL GABLES, FLORIDA 33146
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FAX: (305) 661-2001
jon@friedlandcarmona.com
www.friedlandlawgroup.com

EDUCATION:

B.A., Political Science, with honors, Hobart College, Geneva, New York 1991
J.D., Cum Laude, University of Miami, Coral Gables, Florida 1994

EXPERIENCE:

Merl, Burstyn & Associates, Miami, Florida 1994 – 2002

Handled claims and litigation files for full service Plaintiff's personal injury and medical malpractice law firm. In excess of 50 jury trials including matters in State and Federal Courts. Verdicts and settlements ranged from a high of \$4 million to small injury claims valued less than \$10,000.00. Over saw entire administration of law firm including bookkeeping and secretarial staff. Case load ranged from an average of 200 cases per year.

Jonathan R. Friedland, P.A., Miami, Florida 2002 -2005

Launched solo practice with four employees continuing with specialty in handling high profile catastrophic personal injury cases including automobile accidents, premises liability, negligent security, product liability, medical malpractice and first party insurance claims. Over 50 jury trials with multiple seven figure settlements and verdicts. Created niche in handling PIP claims against automobile insurance companies by representing multiple medical providers in the South Florida area. Retained as expert witness in numerous attorney fee disputes with insurance companies.

Friedland & Brown, P.L., Miami, Florida 2006 – 2008

Merged firm with Robert B. Brown, III, P.A., and continue to handle catastrophic personal injury, product liability, medical malpractice and first party PIP insurance claims. Firm also handles class action suits in the pharmaceutical and consumer protection arena as well as complex commercial litigation.

Friedland Law Group, Coral Gables, Florida 2008 – 2018

Firm launched in Coral Gables location practicing in same specialties and areas as noted above. Began handling first party homeowners and hurricane claims as a major specialty of the new firm.

Friedland | Carmona, Coral Gables, Florida 2019 to present

Formed partnership with long time associate of the firm, Michael J. Carmona, practicing in the major specialty areas of catastrophic plaintiff's personal injury, automobile negligence, wrongful death, premises liability and first party hurricane and homeowners insurance claims.

HONORS AND AWARDS:

"AV" rated lawyer with Martindale-Hubbell
Member, American Board of Trial Advocates (ABOTA), Miami Chapter, 2008 to present.
Past President and Board Member, Miami-Dade Trial Lawyers Association, 2000-2006.
Top Lawyer and Law Firm South Florida Legal Guide, 2003 to present.
Member, Florida Bar Grievance Committee, 2004 – 2006.
Member, Auto Insurance Committee, Florida Justice Association, 2005.
Eagle Member, Florida Justice Association, 2001 to present.
Member, American Association of Justice (AAJ)
Top Verdicts & Settlements Magazine, Miami, Florida 2012
2019 Elected to Super Lawyers in Miami-Dade County in the field of plaintiff's personal injury law. Top 5% of all attorneys awarded this distinction.

COMMUNITY INVOLVEMENT:

Big Brother, Big Brothers and Big Sisters of Greater Miami
Volunteer, Miami-Dade County School Board Career Day, F.S. Tucker Elementary School, Coconut Grove, Florida
Volunteer, Community Partnership for the Homeless, Miami, Florida
Corporate Sponsor, Shop to Stop MS for University of Miami Department of Neurology

FAMILY & PERSONAL:

Wife, Nicole Friedland
Two children, Zachary (19) and Gabriel (17)
Six (6) Time Ironman Triathlon Finisher, Ironman World Championship 2009, Ironman 70.3 World Championships 2008, 2011, 2012
Five (5) Time Boston Marathon Finisher
United States Triathlon All-American, Honorable Mention 2008 – 2012

LICENSES & ADMISSIONS:

1994 to present Florida Bar, Bar Number 0008486.
Federal Court, Southern District of Florida, 1994 to present.