

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

CASE NO.: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

In Re: Champlain Towers South Collapse Litigation

APPLICATION FOR COSTS

COMES NOW, Robes Law Group, PLLC and Romano Law Group, on behalf of JUANA VILLALBA ROJAS, as Personal Representative of the Estate of LEIDY VANESSA LUNA VILLALBA, Deceased (“VILLALBA ESTATE”), and pursuant to this Honorable Court’s June 27, 2022, *Sua Sponte* Order On Attorney’s Fees Claims, and hereby applies for expended costs, and in support of their Application would state as follows:

1. Juana Villalba Rojas is the mother of Leidy Vanessa Luna Villalba. Leidy Vanessa Luna Villalba was twenty-three (23) years of age when she perished in the collapse. She was the only daughter of the Villalba Family.

2. Juana Villalba Rojas has been appointed as the Personal Representative the VILLALBA ESTATE. (A copy of the April 4, 2022 Order Appointing Personal Representative issued by Miami-Dade County Circuit Judge Yvonne Colodny was attached as an exhibit to Plaintiff’s Wrongful Death Claim Form submission of July 18, 2022.) Juana Villalba Rojas resides in Cerrito, Paraguay with her husband and father of the decedent, Osvaldo Luna Machuca, and with one of their sons who is a brother of the decedent, Richart Ruben Luna Villalba.

3. Juana Villalba Rojas entered into a standard contingency fee agreement with Robes Law Group, PLLC and Romano Law Group to prosecute a wrongful death claim related to her daughter’s tragic and untimely passing.

4. The undersigned counsel for the VILLALBA ESTATE filed a wrongful death suit on July 13, 2021 (Case No.: 21-17238-CA-01), which was eventually consolidated into the present consolidated class action case.

5. Upon being retained, the undersigned counsel retained the services of an estate/probate attorney (Horacio Sosa, Esq.) to establish the VILLALBA ESTATE for the purpose of the Estate's pursuit of its wrongful death claim.

6. Mr. Sosa's charges to set up the VILLALBA ESTATE and his charges for his continued work to administer the VILLALBA ESTATE have been paid by the undersigned attorneys. Mr. Sosa's legal services on behalf of the VILLALBA ESTATE are expected to continue until such time as the VILLALBA ESTATE can be closed.

7. The undersigned attorney recognize they were not appointed to leadership positions, nor were they instrumental in securing the unfathomable gross recovery that has been achieved by the tireless efforts of leadership.

8. The undersigned attorneys and their staffs, however, have advanced necessary litigation costs and have provided legal services to their client and to the decedent's survivors and family members in Paraguay under challenging circumstances due to technological deficits on their client's end, through the use of Guarani translation services in Paraguay, and a representative from Robes Law Group has traveled to meet in-person with the client and surviving family members in Miami and in Paraguay on several occasions. These travel expenses and translation services in Paraguay are graciously being waived by those who performed such services.

9. Given that their client and the survivors of the VILLALBA ESTATE reside in Paraguay, counsel anticipate their representation will continue for a considerable amount of time

following any allocation hearing, insofar as counsel will need to assist with securing critical financial protection services in which to ensure that any funds allocated to this claim are appropriately protected for the benefit of the survivors who reside in Paraguay and whom have limited access to reputable financial-planning services.

10. The undersigned attorneys for the VILLALBA ESTATE respectfully request that they be permitted to recoup their expended costs and any future costs that may be incurred for post-settlement/allocation financial planning services, filing/court fees related to filing and service of their complaint, probate/estate costs until such time as the VILLALBA ESTATE can be closed by Mr. Sosa, and any other costs reasonably incurred in assisting the Villalba Family in concluding their wrongful death claim.

11. The undersigned attorneys have attached an affidavit and itemization of expended costs to date pursuant to this request.

WHEREFORE, Robes Law Group, PLLC and Romano Law Group, on behalf of JUANA VILLALBA ROJAS, as Personal Representative of the Estate of LEIDY VANESSA LUNA VILLALBA, Deceased ("VILLALBA ESTATE"), respectfully requests this Honorable Court accept and grant the present application and allow for costs reimbursements as outlined in this application and all other relief deemed necessary and proper.

Certificate of service on the following page:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 27, 2022, a true and correct copy of the foregoing was filed electronically through the Florida Court's E-Filing Portal, which will provide electronic service of this filing to all counsel of record.

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Affidavit of Costs

AFFIDAVIT OF TODD ROMANO

STATE OF FLORIDA)
) S.S.
COUNTY OF PALM BEACH)

BEFORE ME, the undersigned authority, personally appeared TODD ROMANO, who, first being duly sworn, deposes and says:

1. My name is TODD ROMANO. I am a member of the Florida Bar in good standing. I practice law at the firm of Romano Law Group, with law offices in West Palm Beach, Florida.

2. I have been licensed to practice law since 1999.

3. Romano Law Group is co-counsel in this matter with Robes Law Group, PLLC. The firms jointly represent JUANA VILLALBA ROJAS, as Personal Representative of the Estate of LEIDY VANESSA LUNA VILLALBA, Deceased ("VILLALBA ESTATE").

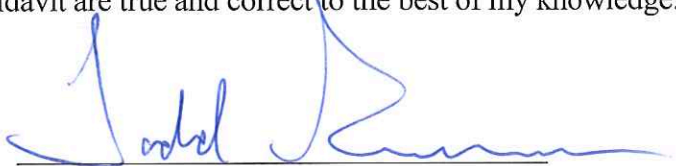
4. JUANA VILLALBA ROJAS entered into a standard contingency fee agreement with Robes Law Group, PLLC and Romano Law Group to prosecute a wrongful death claim related to her daughter's tragic and untimely passing.

5. To date, Romano Law Group has expended \$3,475.03 in costs (*see itemization attached hereto as an exhibit*).

6. To date, Robes Law Group, PLLC has expended \$1,260.53 in costs (*see itemization attached hereto as an exhibit*).

7. The facts as stated in this Affidavit are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NOT.


TODD ROMANO

STATE OF FLORIDA

COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 27th day of July, 2022, by
TODD ROMANO, who is personally known by me or who produced

(type of identification)
as identification.

Cady Piarulli
(NOTARY SIGNATURE)

(SEAL)

CADY Piarulli
(TYPED/PRINTED NAME OF NOTARY)



CADY M. PIARULLI
Commission # GG 314292
Expires June 1, 2023
Bonded Thru Budget Notary Services

Florida Notary
(TITLE OR RANK)

GG 314292
(SERIAL NUMBER, IF ANY)

MY COMMISSION EXPIRES: June 1, 2023

Romano Law, PL

801 Spencer Dr
West Palm Beach, FL 33409

Phone # (561) 533-6700

Romano Law Group Costs Ledger

Invoice

Date	Invoice #
7/26/2022	563

Bill To
Villalba Rojas Estate (71008)

Date	Description	Amount
7/13/2021	Fee to file suit and issue summonses	443.50
7/16/2021	Fee to issue summonses	165.60
7/29/2021	Williams Proces Service, 7/29 service on Scott Stewart	70.95
7/29/2021	Williams Proces Service, 7/29 service on Willcott Engineering	70.95
7/29/2021	Williams Process Service, 7/29 service on Terra World Investments	50.95
8/2/2021	Williams Process Service, 7/30 service on John Moriarty + Assoc	70.95
8/2/2021	Williams Process Service, 7/30 service on NV5 Inc	70.95
8/2/2021	Williams Process Service, 7/30 service on NV5 Global	70.95
8/2/2021	Williams Process Service, July 30 service on Champlain Towers S Condo Assoc	50.95
8/2/2021	Williams Process Service, July 30 service on 8701 Collins Ave Condo Assoc	70.95
8/2/2021	Williams Process Service, July 31 service on Tanenbaum-Harbor of FL	70.95
8/3/2021	Williams Process Service, Aug 3 service on Eighty-Seven Park	50.95
8/4/2021	Williams Process Service, July 30 service on 8701 Collins Development LLC	50.95
8/4/2021	Williams Process Service, July 30 service on Terra Group LLC	50.95
8/4/2021	Williams Process Service, July 30 service on Corporate Protection and Restoration	50.95
8/18/2021	Williams Process Service, Aug 16 service on Morabito Consultants	156.90
8/31/2021	Williams Process Service, Aug 25 service on Bizzi + Partners Development	325.95
10/8/2021	Horacio Sosa PA, probate administration (50% of charge)	1,250.00
10/25/2021	Fee to issue alias summons	10.35
10/28/2021	Williams Process Service, Oct 28 service on Bizzi & Partners Development c/o RA Michelle Capitano Esq	130.95
11/15/2021	Williams Process Service, Nov 15 non-service on Scott Dyer Architect PA	181.90
3/1/2022	February 2022 postage	7.53
	Total Reimbursable Expenses	3,475.03

Total \$3,475.03

Payments/Credits \$0.00

Balance Due \$3,475.03

Date	Received From/Paid To	Chq#	----- General -----		Bld	----- Trust Activity -----				
Entry #	Explanation	Rec#	Rcpts	Disbs	Fees	Inv#	Acc	Rcpts	Disbs	Balance
20601	Villalba Rojas, Juana									
20601-001	Villalba Rojas, Juana as presumptive personal									Resp Lawyer: TAR
Jul 14/2021										
407732	Scans			6.21						
Jul 14/2021										
407733	Photocopies			3.42						
Oct 8/2021	HORACIO SOSA, P.A.									
433928	Preparation of Estate - Villalba Rojas, Juana 20601-001 DMP			1250.00						
Oct 19/2021										
434074	Scans			0.36						
Dec 10/2021										
451656	Photocopies			0.54						
TOTALS	CHE	+	UNBILLED	+	FEEES	= TOTAL		BILLED		
PERIOD	1250.00		10.53		0.00	1260.53		DISBS	+	FEEES
								0.00		0.00
								+ TAX	- RECEIPTS	
								0.00	0.00	
									= A/R	TRUST
									0.00	0.00

REPORT SELECTIONS - Client Ledger

Layout Template Default

Advanced Search Filter None

Requested by DMP

Finished Tuesday, July 26, 2022 at 03:03:53 PM

Ver 14.2 (14.2.20180125)

Matters 20601-001

Clients All

Major Clients All

Client Intro Lawyer All

Matter Intro Lawyer All

Responsible Lawyer All

Assigned Lawyer All

Type of Law All

Select From Active, Inactive Matters

Matters Sort by Default

New Page for Each Lawyer No

New Page for Each Matter No

No Activity Date Dec/31/2199

Firm Totals Only No

Totals Only No

Entries Shown - Billed Only No

Entries Shown - Disbursements Yes

Entries Shown - Receipts Yes

Entries Shown - Time or Fees Yes

Entries Shown - Trust Yes

Incl. Matters with Retainer Bal No

Incl. Matters with Neg Unbld Disb No

Trust Account All

Working Lawyer All

Include Corrected Entries No

Show Check # on Paid Payables No

Show Client Address No

Consolidate Payments No

Show Trust Summary by Account No

Show Interest No

Interest Up To Jul/26/2022

Show Invoices that Payments Were Applied to No

Display Entries in Date Order