

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

COMPLEX BUSINESS DIVISION

CASE NO.: 2021-015089-CA-01

IN RE: CHAMPLAIN TOWERS SOUTH  
COLLAPSE LITIGATION

\_\_\_\_\_ /

**CLASS PLAINTIFFS' RESPONSE TO  
AUGUST 3, 2022, COURT ORDER**

In its Order entered August 3, 2022, the Court ordered Class Counsel to “immediately” confirm if the Court was “incorrect” that the “time/costs expended by counsel in connection with the CTS claims process [was] not included (or estimated) in the aggregate ‘lodestar’ reported by Class Counsel in their pending fee motion.”

Undersigned Co-Chair Lead Counsel submit this response only to confirm that time and costs expended by certain Plaintiffs’ Steering Committee Members as “Client Benefit Time,” as distinct from “Common Benefit Time,” were submitted along with the motion for final approval and fee application filed on June 12, 2022, but only such time as recorded prior to June 1, 2022. At pages 50-51 of the fee application, the nature of this time is explained.

**CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the clerk of Court using the Florida Courts E-Filing Portal and furnished a copy of same to all counsel of record through the Florida Courts E-Filing Portal on this 3<sup>rd</sup> day of August 2022.

Respectfully submitted this 3<sup>rd</sup> day of August 2022.

<p><u>/s/ Harley S. Tropin</u> Harley S. Tropin (FBN 241253) Javier A. Lopez (FBN 16727) Jorge L. Piedra (FBN 88315) Tal J. Lifshitz (FBN 99519) Eric S. Kay (FBN 1011803) KOZYAK TROPIN &amp; THROCKMORTON LLP 2525 Ponce de Leon Boulevard, 9th Floor Coral Gables, FL 33134 Tel: (305) 372-1800 hst@kttl.com</p> <p><b><i>Plaintiffs' Co-Chair Lead Counsel</i></b></p>	<p><u>/s/ Rachel W. Furst</u> Rachel W. Furst (FBN 45155) Stuart Z. Grossman (FBN 156113) GROSSMAN ROTH YAFFA COHEN, P.A. 2525 Ponce de Leon Boulevard, Suite 1150 Coral Gables, FL 33134 Tel: (305) 442-8666 rwf@grossmanroth.com</p> <p><b><i>Plaintiffs' Co-Chair Lead Counsel</i></b></p>
--	---