

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

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

CLASS REPRESENTATION  
COMPLEX BUSINESS LITIGATION  
DIVISION

CASE NO.: 2021-015089-CA-01

/ Florida Bar No: 0008486

**NOTICE OF FILING AMENDED AND SUPPLEMENTAL  
ITEMIZATION OF ATTORNEY'S TIME FOR SHAMOKA FURMAN,  
INDIVIDUAL PERSONAL INJURY CLAIMANT**

COMES NOW the undersigned counsel and hereby files this Notice of Filing Jonathan R.  
Friedland, Esq., Amended and Supplemental Itemization of Time of Counsel for Shamoka  
Furman, individual personal injury claimant.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was emailed  
on this 11<sup>th</sup> day of August, 2022 to:

Hon. Michael Hanzman ([mhanzman@jud11.flcourts.org](mailto:mhanzman@jud11.flcourts.org))  
Michael Goldberg ([michael.goldberg@akerman.com](mailto:michael.goldberg@akerman.com))  
Harley Tropin ([hst@kttlaw.com](mailto:hst@kttlaw.com))  
Rachel Furst ([rwf@grossmanroth.com](mailto:rwf@grossmanroth.com))  
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BY \_\_\_\_\_  
Jonathan R. Friedland, Esq.

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CASE NO.: 2021-015089-CA-01

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**JONATHAN R. FRIEDLAND, ESQ. AMENDED AND SUPPLEMENTAL  
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.**
23. June 7, 2022- create and send medical records request to Concentra Medical Center for full workers compensation file. **.2 hours**
24. June 7, 2022- create and send medical records request to Open MRI of Miami-Dade. **.2 hours**
25. June 7, 2022- create and send out medical records request to Bolanos and Associates for Psychiatric records and bills. **.2 hours**
26. June 7, 2022- create and send out records request to Warren Grossman, M.D., Orthopedic Surgeon. **.2 hours.**
27. June 14, 2022- draft, file and mail to Judge Hanzman and receive a cover letter explaining my demand for fees in the case. Attach motion, resume and time sheets to letter. **1.5 hours.**

28. June 16, 2022- finalize all documents to file with the receiver on the personal injury claim.  
Organize and put in chronological order all medical records and lien information. **2.0 hours.**
29. June 17, 2022- email and officially file personal injury claim with cover letter to receiver at designated email address. **.2 hours.**
30. June 22, 2022- phone conversation with client and Kimberly Smiley from receiver Goldberg's office to set hearing on personal injury claim. **.2 hours**
31. June 27, 2022- receive and review Courts Sua Sponte order regarding attorneys' fees and noting 30 day time limit. Make note we have to refile our previously filed time sheets and letter. **.35 hours.**
32. June 28, 2022- Draft our renewed motion for attorneys' fees with all attachments. **1.0 hours.**
33. June 28, 2022- draft a letter and email to Judge Hanzman regarding my renewed motion to grant our attorneys' fees in the case and file with Court. **.5 hours.**
34. June 28, 2022- additional phone conversation with Kimberly Smiley at receiver Goldberg's office to set hearing for personal injury claim for July 26, 2022. **.2 hours.**
35. June 28, 2022- draft letter to Shamoka Furman advising of hearing for her claim set for July 26, 2022 at 3:30 P.M. **.2 hours.**
36. June 29, 2022- draft and send letter to Judge Hanzman to hand deliver all forms, records and information regarding claim for personal injury. **.35 hours.**
37. July 21, 2022- receive and review email from Debra Cohen-Malamed and Jewish Community Services to obtain records on Shamoka Furman. **.1 hours.**

38. July 25, 2022- meet with Ms. Furman to go over all her medical records and discuss our demands with the Court. Review her current medical records and treatment and get updated information regarding her psychological treatment with Jewish Services. **2.0 hours.**
39. July 26, 2022- attend hearing with Judge Hanzman and client. Present arguments. **1.0 hours.**
40. August 4, 2022- receive and review external communication form from Jewish Community Services of South Florida, Debra Cohen-Melamed on clients psychological counseling. Prepare letter to Judge Hanzman to supplement the record and consideration of claim. **.5 hours.**

Total time expended to date: 30.15 hours x \$700.00 per hour = \$21,105.00.

Jonathan R. Friedland  
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