

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

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

CLASS REPRESENTATION

COMPLEX BUSINESS LITIGATION
DIVISION

CASE NO.: 2021-015089-CA-01

/ Florida Bar No: 0008486

NOTICE OF FILING JONATHAN R. FRIEDLAND, ESQ.
ITEMIZATION OF TIME OF COUNSEL FOR THE
ESTATE OF ANASTASIYA GROMOVA

COMES NOW the undersigned counsel and hereby files this Notice of Filing Jonathan R.
Friedland, Esq., Itemization of Time of Counsel for the Estate of Anastasiya Gromova.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was emailed
on this 12th day of August, 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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BY



Jonathan R. Friedland, Esq.

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**JONATHAN R. FRIEDLAND, ESQ. ITEMIZATION OF TIME OF COUNSEL FOR
THE ESTATE OF ANASTASIYA GROMOVA**

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 30, 2021 – Meet with clients in person and explain scope of representation. Answer all questions and explain documents needing signature. **2.0 hours.**
2. July 8, 2021- Assist client in completing 8701 Collins Development LLC Questionnaire from Greenberg, Traurig et al **.4 hours.**
3. July 15, 2021- receive and review letter from Goldberg Segalla regarding insurance information for Champlain Towers South and Philadelphia Insurance. Discuss with clients. **.5 hours.**
4. July 16, 2021- receive and review paperwork from clients in person. This includes signed power of attorney and HIPPA authorizations. Also provided information on Anastasiya for her job in Canada to get all records. Conversation with client regarding opening an Estate in Canada. **1.4 hours.**
5. July 16, 2021- Receive and review end of life assistance form and assist client in completing the form and gathering information to send to receiver. **.85 hours.**

6. July 17, 2021- receive and review Email from Keith Diamond, Esq regarding getting Senator involved so Anastasiya's remains can be returned to her family. **.1 hours.**
7. July 17, 2021- receive and review copy of passport from client. **.1 hours.**
8. July 21, 2021- Attend zoom status conference with Judge and receiver, Michael Goldberg. Advised of funds currently available and status class action lawsuit. Discuss meeting with client after conference. **2.5 hours**
9. July 22, 2021- draft letter to Champlain Towers South, Becker Law and Michael Goldberg, receiver advising of our representation of Estate. **.35 hours.**
10. July 22, 2021- receive and review letter from Michael Goldberg, receiver, with check for end of life assistance (\$2,000.00). Meet with clients to deliver check at office. Discuss case and where we stand. **1.5 hours.**
11. August 15, 2021- receive and review Contact Information Questionnaire from Michael Goldberg, Receiver. Assist client in completing form. **.85 hours.**
12. December 13, 2021- Attend zoom meeting with all class action lawyers on class action lawsuit being filed. Mr. Tropin and Ms. Furst lead the meeting as well as lawyers handling the property damage and personal injury aspects of case. Discuss meeting with clients. **1.85 hours.**
13. March 27, 2022- speak to Sergiy Gromov regarding trying to get his daughters Google Account information. He follows this up with an email explaining what is needed. Contact Google and speak to person to see what we can do to get a court order. **2.3 hours.**

14. March 30, 2022- email with Kimberly Smiley from receiver's office regarding getting Google order executed by judge. Advised she is wrong person to be contacting and speak to Ricardo Martinez Cid. **.25 hours.**
15. April 9, 2022- receive and review death certificate from Sergiy Gromov. **.1 hours**
16. April 11, 2022- email to Ricardo Martinez-Cid regarding Google order needed. Told to set phone conference. **.2 hours.**
17. May 5, 2022- email to Mustafa Dandashly at Goldberg & Rosen regarding needing claim forms to complete for file and also discuss the Google order. **.2 hours.**
18. May 8, 2022- Receive and review completed claim form for Goldberg & Rosen from client. **.1 hours.**
19. May 11, 2022- meeting via Zoom regarding proposed settlement in class action case. Discuss amounts of settlement, conditions of settlement and process of claims administration. Discuss meeting with clients. **1.25 hours.**
20. May 11, 2022- contact Goldberg & Rosen regarding issue with Google. Draft order needed for Court to sign and send to Judd Rosen. **1.3 hours.**
21. May 12, 2022- draft unopposed motion and order for Mustafa Dandashly to submit to judge regarding Google account of client and documents needed. Forward documents to Mr. Dandashly. **1.0 hours.**
22. May 12, 2022- receive and review copy of letter and order from Goldberg & Rosen to Court submitting order so clients can try and retrieve Google documents from daughter's account. **.1 hours.**
23. May 12, 2022- Discuss Estate with Goldberg & Rosen and go over final version of Google motion and order. **.25 hours.**

24. May 27, 2022- receive and review claim forms from Ricardo Martinez-Cid to start process of filing claim with Receiver. Review claim forms to see what information will need to be gathered. Contact client to advise we will be emailing some information and forms. **.75 hours.**
25. May 31, 2022- discussion with client regarding forms for class action settlement. Go over some of the topics and discuss photos and personal statements needed. Email forms to clients. **.4 hours.**
26. May 31, 2022- receive and review two Estate forms from client regarding Canadian Estate opened for Anastasiya. Discuss with client. **.25 hours.**
27. June 1, 2022- telephone conference with clients to go over claim forms and discuss obtaining tax returns, photos depicting the family together in chronological order and any evidence of property lost on day of collapse. Go over all forms and information and answer all questions. **2.0 hours.**
28. June 7, 2022- complete all forms for filing with receiver and make sure we have all tax returns, photos and client's personal statements. Review all information and finalize forms and numbers for wage loss and net accumulations of Estate. Go over forms with clients. **1.85 hours.**
29. June 8, 2022- attend by Zoom meeting with Michael Goldberg, receiver, and other lawyers to discuss claims process for wrongful death claims. Discuss the forms, information needed, estates opening etc. **1.0 hours.**
30. June 9, 2022- research National Vital statistics for life expectancy for Anastasiya to include in final forms. **1.0 hours.**

31. June 13, 2022- receive and review all of Anastasiya's tax returns and partially completed claim forms. Review documents for initial calculations of net accumulations. **.35 hours.**
32. June 13, 2022- email and discuss via phone opening Estate in Florida with Beth Lazar, Esq, Monique Charlebois, Esq (Canadian Lawyer) and clients. Need to comply with Florida and Canadian Law. **1.0 hours.**
33. June 14, 2022- Receive and review rough draft of Petition of Administration for Estate from Beth Lazar. **.1 hours.**
34. June 15, 2022- draft notice of pro bono representation of Estate. **.3 hours.**
35. June 23, 2022- discussion with Beth Lazar regarding Estate being filed and case number assigned. Judge Hirsch was judge assigned to file. **.2 hours.**
36. June 28, 2022- phone conversation with Sergiy Gromova regarding his personal statement. Make minor suggestions and corrections. **.4 hours.**
37. June 29, 2022- file all forms with receiver including wrongful death forms and property damage. Receive notification that forms were filed via email. Prepare binders of all documents so we can send to Court. **1.5 hours.**
38. June 29, 2022- prepare cover letter to Judge Hanzman to send him all documents filed with Receiver and to make sure he has all supporting documents. **.35 hours.**
39. July 22, 2022- Receive and review email from Kimberly Smiley regarding sending documents to Elan Sternberg, CPA. **.1 hours.**
40. July 22, 2022- contact Elan Sternberg's office by both email and phone as he needs all the documents for next week's hearing. Upload all documents to his Mimecast server. **1.0 hour.**

- 41. July 25, 2022- meet with clients at office to prepare for tomorrows hearing. Go over all facts and make notes about background of each family member. Review all photos and paperwork filed and discuss what should be presented to Court. **3.5 hours.**
- 42. July 26, 2022- meet client 30 minutes before hearing with Judge Hanzman to go over last minute questions and concerns. **.5 hours**
- 43. July 26, 2022- Attend in person hearing with Judge Hanzman and clients. **1.0 hours.**
- 44. July 26, 2022- obtain order for client to get Google documents from Anastasiya's account in Canada. Clerk creates conformed copies and discuss with client. **.2 hours.**
- 45. August 5, 2022- receive and review notice of hearing on attorneys' fees motion for all attorneys' involved in case. Review and check to see if have a zoom link. **.2 hours.**
- 46. August 8, 2022- receive and review executed letters of administration showing Estate is officially opened. **.1 hours.**

Total time expended to date: 37.5 hours x \$700.00 per hour = \$26,250.00.

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