

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

COMPLEX BUSINESS  
LITIGATION DIVISION

IN RE: CHAMPLAIN TOWERS SOUTH  
REPRESENTATION  
COLLAPSE LITIGATION.

CASE NO. 2021-015089-CA-01

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**APPLICATION FOR FEES**

Pursuant to the Court's August 3, 2022 *Sua Sponte Order on Supplemental Attorneys' Fees Applications*, the law firm of Silva & Silva, P.A. ("S&S"), respectfully requests attorneys' fees for its work on behalf of its clients throughout the CTS claims process as noted in the Declaration of Jorge E. Silva, Esq., attached hereto as **Exhibit A**. Composite Exhibit A to the aforementioned Declaration contains a breakdown of S&S's requested lodestar amount. As stated in the Declaration, S&S will be providing time and expense printouts supporting S&S's requested lodestar amount to the Court for *in camera* review.

WHEREFORE, Silva & Silva, P.A. respectfully requests attorneys' fees as reflected in the attached Declaration.

Respectfully submitted,

**SILVA & SILVA, P.A.**  
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By: /s/ Jorge E. Silva  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed and served through Florida's e-Filing Portal to all counsel of record registered to receive service for this matter on this 26th day of August 2022.

By: /s/ Jorge E. Silva

**IN THE CIRCUIT COURT OF THE 11<sup>TH</sup> JUDICIAL  
CIRCUIT IN AND FOR MIAMI DADE-COUNTY, FLORIDA**

CASE NO.: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

**Exhibit "A"**

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

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**DECLARATION OF COURT APPOINTED CLASS COUNSEL, JORGE SILVA, FILED  
ON BEHALF OF THE FIRM OF SILVA & SILVA, P.A. IN SUPPORT OF  
APPLICATION FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES**

I, Jorge E. Silva, Esq., do hereby declare and state as follows:

1. I am, a Managing Partner at Silva & Silva ("S&S"). Throughout the course of this litigation, I worked almost daily alongside other Leadership counsel as a Court appointed member of the Plaintiffs' Steering Committee. I submit this declaration in further support of Class Counsel's unified Fee Application filed June 12, 2022, and S&S's request for a share of any award of attorneys' fees and reimbursement of expenses in connection with the services we rendered in this case.

2. This declaration details S&S's extensive work on this case from June 1, 2022, forward, and supplements S&S's submissions to this Court in connection with the June 12, 2022, Fee Application.

3. S&S dedicated **all** of its resources to represent more than twenty individuals who lost children, mothers, fathers, sisters, brothers, and grandparents, as a result of the collapse that occurred on June 24, 2021. I, along with Carlos E. Silva, Esq., Paul Layne, Esq., Carolina Suarez, Esq., Benjamin Fernandez, IV Esq., Maria Corghi, Esq., and staff, devoted our time and effort, almost exclusively, into working with our clients to obtain the documentation and testimony this Court desired to appreciate the intimate relationship between all of our clients and those who perished. As this Court stated, it is impossible to truly know an individual through a binder. It was

with a great amount of pride that S&S worked tirelessly with our clients, family, and friends to present the magnitude of their losses.

4. S&S's efforts were instrumental in the claims process. Our clients were relieved of the daunting task of filling out forms and preparing documents, which were a constant reminder of the tragic loss. All of our clients appreciated a sense of security and comfort in knowing that they were not in this alone. Equally important, S&S's experience in presenting catastrophic matters to courts all over the country, assisted this Court in understanding the relationship that was forever severed between our clients and their loved ones. A relationship that does not readily appear in the black and white forms.

5. S&S presented damages claims on behalf of fifteen (15) decedents' families: Ana Ortiz, Antonio Lozano, Gladys Lozano, Claudio Bonnefoy, Francis Fernandez, Juan Mora, Sr., Juan Mora, Jr., Manuel V. Lafont, Jr., Stella Cattarossi, Leon Olikowicz, Cristina E. Betarte, Catalina Gomez-Ramirez, Valeria Barth-Gomez, Maria S. Obias-Bonnefoy and Andreas Giannitsopoulos. Of these clients, eleven families elected to present their claims to this Court through a Claim Hearing.

6. Over the past several months, S&S prepared each claim as if it were being presented to a jury. Confronted with the fact that one cannot possibly understand the loss our clients endure from reading a notebook, S&S made every effort to provide this Court with a full understanding into the lives, memories, and pain that our clients must confront.

7. Considerable time and effort was spent conducting interviews of friends and family, obtaining photographs and videos, conducting onsite video, editing videos and preparing unique power-point presentations. S&S worked hand in hand with our clients on a daily basis to assist this Court in appreciating who these amazing men, women, and children were and what they meant to each of our clients. It is important to note that all of the presentations were created, edited, and finalized at S&S, without the assistance of outside vendors.

8. S&S also presented economic claims on behalf of its clients. Toward that end, S&S retained experts in the field, compiled the necessary documentation, and incorporated these claims into the Claim Form and final presentations.

9. On behalf of all our clients, attorneys, and staff, I thank this Court for its compassion. This was, without question, one of the most, if not the most difficult time in our clients' lives. The compassion, patience, and dedication exhibited by this Court alleviated a substantial amount of the heartbreak and grief.

10. The information in this declaration regarding my firm's time and expenses is documented and reflected in time and expense printouts and supporting documentation prepared and maintained by my firm in the ordinary course of business, and which is being submitted directly to the Court for in camera review. I am the Managing Partner who oversaw the activities in this matter and I have reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation, including the elimination of time that was unnecessary or duplicative.

11. The number of hours spent on these matters by my firm from June 1, 2022, until August 25, 2022, is 1,337.3, which results in a lodestar of \$1,014,472.50. A breakdown of the lodestar is provided in **Exhibit A**. The chart set forth as **Exhibit A** was prepared from contemporaneous daily time records of the firm. It is important that the Court further understand that S&S will continue to represent these clients long after this matter is concluded. This representation will include Estate and guardianship work.

12. Additionally, **Silva & Silva** has incurred expenses and charges in connection with the presentation of the individual clients' claims. Those expenses and charges are being provided to the Court *in camera* along with the time sheets relevant to those individual clients.

13. The time and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient presentation

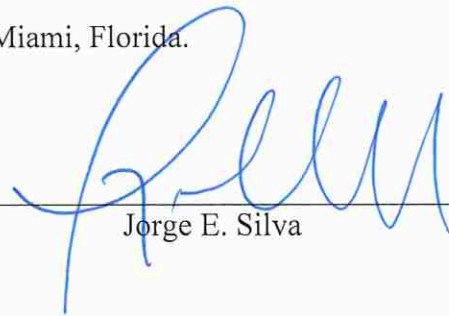
of the class members' claims. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace, and are reflected in the books and records of S&S. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

14. The time and work discussed in this petition is separate from S&S's contribution which was discussed at length in my Declaration in Support of Motion for Approval of Payment of Attorney's Fees and Litigation Expenses, filed as Exhibit 17 to Class Counsel's unified Fee Application filed June 12, 2022. S&S will appear at the hearing on the Motions for Attorney's fees scheduled for August 29, 2022 and be prepared to answer any questions this Court may have concerning S&S's contribution in this regard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26<sup>th</sup> day of August, 2022 at Miami, Florida.

/s/



Jorge E. Silva

# EXHIBIT A

## IN RE: CHAMPLAIN TOWERS SOUTH COLLAPSE LITIGATION

### TIME REPORT

FIRM NAME: Silva & Silva

REPORTING PERIOD: June 1, 2022 through August 26, 2022

Name (Status: P, A, Counsel, Para, Clerk)	Total Hours	Hourly Rate	Total Lodestar
Partner, Jorge Silva	251.3	\$1,000.00	\$251,300.00
Partner, Carlos Silva	172.8	\$1,000.00	\$172,800.00
Jr. Partner, Ben Fernandez	211.9	\$750.00	\$158,925.00
Jr. Partner, Paul Layne	128.5	\$750.00	\$96,375.00
Jr. Partner, Carolina Suarez	294.9	\$750.00	\$221,175.00
Associate, Maria Corghi	149.9	\$525.00	\$78,697.50
Paralegal, Mayra Romera	35.9	\$275.00	9,872.50
Paralegal, Janesy Alvarez	50.6	\$275.00	\$13,915.00
Paralegal, Sabrina Angel-Bello	41.5	\$275.00	\$11,412.50
<b>TOTALS</b>	<b>1,337.3</b>		<b>\$1,014,472.50</b>