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

COMPLEX BUSINESS LITIGATION DIVISION

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Hon. Michael Hanzman

In re: Champlain Towers South Collapse Litigation

# AMENDED APPLICATION FOR AWARD OF LEGAL FEES, COSTS, AND EXPENSES

Carlos A. Velasquez, Esq., as attorney for the ESTATE OF LUIS FERNANDO BARTH TOBAR (Case No. 2021-05319-CP02), comes before this court upon his Amendment to Application For Award of Legal Fees, Costs, and Expenses and, in support thereof, states as follows:

- 1. On July 26, 2022, the undersigned filed his Application For Award of Legal Fees, Costs, And Expenses in connection with the claims brought on behalf of the ESTATE OF LUIS FERNANDO BARTH TOBAR (the "Application"). See Application attached hereto as **Exhibit** A (exhibits thereto not included).
- 2. As part of the undersigned's calculation of legal fees, the Application estimated an additional 11 hours of partner time and 5 hours of paralegal time would be necessary for the preparation and effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR at the damages hearing as well as to close out this case. This additional time included, but was not limited to: (a) counsel's preparation for the evidentiary hearing on the claim; (b) taking sworn

video statements from the client, a before and after witness, an expert economist, and an expert psychologist; (b) meeting with the client in preparation for the evidentiary hearing; (c) counsel's preparation for the evidentiary hearing; and (d) presentation of evidence and testimony at the evidentiary hearing.

- 3. At this time, the undersigned is able to calculate the total time regarding legal services provided in the subject case through August 8, 2022. As such, the estimated additional time previously provided in the Application can be eliminated and replaced with the actual hours of legal services provided.
- 4. In addition, after filing the Application, the law firm of Velasquez Dolan, P.A. has incurred substantial additional costs related to this matter and the evidentiary hearing.
- 5. The details regarding my time and that of additional work by my partner and legal staff in connection with the ESTATE OF LUIS FERNANDO BARTH TOBAR are reflected in computer records and supporting documentation prepared and maintained by Velazquez Dolan, P.A. in the ordinary course of our business. I have reviewed the printouts and documentation prior to the date of this Amended Application for Legal Fees, Costs and Expenses.
- 6. During my review I confirmed, to the best of my ability, the accuracy of the time entries, the necessity for the work performed, the reasonableness of the time spent performing the work, and the time committed to this litigation. I waived fees related to any conversations with the personal representative and/or beneficiary that were less than 30 minutes in duration. I eliminated any time that I considered duplicative of other work. I also adjusted time which I considered excessive for the task performed.
- 7. As a result of my review of the time entries and any adjustments, I believe that the time reflected in Velasquez Dolan P.A.'s lodestar calculation for which payment is sought is

reasonable in amount and was necessary for the effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR as stated in the Florida Bar Rules of Professional Conduct.

- 8. The number of hours spent on this litigation by me is <u>97.1</u> hours. The number of hours spent on this litigation by my partner is <u>3.7</u> hours; additional services performed by paralegals and legal assistants is <u>69.3</u>. Paralegal and legal assistant time was restricted to substantive work and communication with the clients as directed by me. See **Exhibit B** attached hereto and incorporated herein.
- 9. The lodestar amount for undersigned's time based on the firm's current rates is \$950.00. This rate is reasonable and equal to or below the rate charged by other attorneys in the legal community of South Florida in light of the undersigned's 34 years in practice; experience with trials and wrongful death cases; status as a board-certified trial lawyer since 2002; and experience with complex litigation.
- 10. The lodestar amount for a partner covering status conference hearings and collaborating with lead trial counsel is \$750.00. The lodestar amount for paralegals and legal assistants possessing a juris doctorate is \$275.00. These rates are reasonable and commensurate with the type of services provided by them and their education level.
- 11. The lodestar amount for a paralegal with over 15 years of experience is \$250.00. This rate is reasonable and commensurate with her experience and services provided in this case.
- 12. The total amount of legal fees for the services required for the reasonable, necessary, and effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR is \$111,177.50.
- 13. To date, the total costs incurred by Velasquez Dolan, P.A. in connection with this matter currently is \$20,275.87. See **Composite Exhibit C** which is attached hereto.

- 14. Velasquez Dolan, P.A. hereby requests payment of legal fees and costs regarding the ESTATE OF LUIS FERNANDO BARTH TOBAR, as indicated above and/or as deemed reasonable, just, and equitable by this Honorable Court.
- 15. The Personal Representative of the ESTATE OF LUIS FERNANDO BARTH
  TOBAR, Sergio Barth Tobar, has been provided a true and correct copy of the foregoing
  Application For Award Of Legal Fees, Costs, And Expenses along with the exhibits.

Dated: <u>26th</u> day of August, 2022

Respectfully submitted,

Carlos A. Velasquez, Ésq. Florida Bar No.: 755982 Velasquez Dolan, P.A. Attorneys for Plaintiff

101 N. Pines Island Road, Suite 201 Ft. Lauderdale, Florida 33324

T:(954) 382-0533 / F:(954) 382-0585

Email: <u>CVelasquez@vdlawyers.com</u> Andrea@vdlawyers.com

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to Florida Rule of Judicial Administration 2.516 and Florida Rule of Civil Procedure 1.080, on this <u>26th</u> day of August, 2022, a true and correct copy of the foregoing document was e-filed with the Clerk of the Court and served upon all counsel of record registered to receive service for this matter listed in Florida Courts E-Filing Portal.

Carlos A. Velasquez, Esq. Florida Bar No.: 755982

# **EXHIBIT A**

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

> COMPLEX BUSINESS LITIGATION DIVISION

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE:

Hon. Michael Hanzman

In re:

Champlain Towers South Collapse Litigation

APPLICATION FOR AWARD OF LEGAL FEES, COSTS, AND EXPENSES

Carlos A. Velasquez, Esq., as attorney for the ESTATE OF LUIS FERNANDO BARTH TOBAR (Case No. 2021-05319-CP02) and the ESTATE OF VALERIA BARTH GOMEZ (Case No. 2021-004930-CP02), comes before this court upon his Application For Award of Legal Fees, Costs, and Expenses, as required by this Court's Sua Sponte Order On Attorneys' Fees Claims entered on June 27, 2022, and in support thereof, states as follows:

- 1. The undersigned is a board-certified civil trial lawyer who has practiced law for over 34 years. During the course of my career, I have litigated and represented victims of aviation disaster cases, litigated wrongful death cases, litigated personal injury cases, litigated tobacco cases, defended global corporations and individuals in commercial litigation, and litigated in many class actions and complex litigation matters. See Profile of Carlos A. Velasquez, Esq. attached hereto as Exhibit A.
- 2. On June 24, 2021, LUIS FERNANDO BARTH TOBAR perished as a result of the collapse of the Champlain Towers South Condominium ("CTS").
- 3. On June 24, 2021, minor VALERIA BARTH GOMEZ perished as a result of the collapse of CTS.

1

- 4. On August 12, 2021, the brother of the decedent, Sergio Barth Tobar, and the mother of the decedent, Marta Maria Tobar Molina executed contracts retaining my law firm, Velasquez Dolan, P.A., and attorney Carlos A. Velasquez, Esq. to represent their interests regarding the unfortunate death of LUIS FERNANDO BARTH TOBAR. See **Exhibit B** attached hereto.
- 5. Also on August 12, 2021, Sergio Barth Tobar, uncle of the deceased minor VALERIA BARTH GOMEZ, and Marta Maria Tobar Molina, grandmother of the deceased minor, executed contracts retaining my law firm, Velasquez Dolan, P.A. and Carlos A. Velazquez, Esq. to represent their interests regarding the unfortunate death of VALERIA BARTH GOMEZ. See Exhibit C attached hereto.
- 6. The retainer agreement entered into with Sergio Barth Tobar and Marta Maria Tobar Molina ("Beneficiaries") regarding the two cases referenced above were contingency fee contracts wherein the Beneficiaries agreed to pay to Velasquez Dolan, P.A. a percentage of the recovery obtained. Legal costs of Velasquez and Dolan, P.A. regarding their case would also be included in that percentage of the total recovery. See Exhibit B and Exhibit C.

#### ESTATE OF VALERIA BARTH GOMEZ

7. My role in the case of the ESTATE OF VALERIA BARTH GOMEZ was as co-counsel to attorney Carlos Silva and Silva & Silva P.A. During the course of that case, Velasquez Dolan P.A and I performed a considerable amount of work. For example, I spoke to and met with the beneficiaries of the Estate, I traveled to Miami for several meetings with co-counsel, my office obtained documents necessary for both the probate case and the subject case, my office assisted

with the preparation of necessary claims forms, and my office provided information to the Court and to Co-counsel which was necessary to reach a resolution of this matter.

8. Despite the fact that a considerable amount of legal services was provided regarding the ESTATE OF VALERIA BARTH GOMEZ case, the undersigned, individually, and Velasquez & Dolan, P.A. are not seeking an award of attorney's fees or costs in this matter.

### ESTATE OF LUIS FERNANDO BARTH TOBAR

- 9. In the matter of LUIS FERNANDO BARTH TOBAR, after being retained, Velasquez Dolan secured and paid for the services of a probate lawyer to open the appropriate probate action and to have a Personal Representative appointed. During the course of this probate action, I had telephone conversations and exchanged e-mails with probate attorney, Michael D. Wild Esq., and the Beneficiaries, who reside in Miami-Dade County, Florida and Colombia. I monitored the progress of the case. I also presented documents requiring signatures, via international courier, to the Beneficiaries after explaining their contents and significance.
- 10. Once the decedent's brother, Sergio Barth Tobar, was designated by the probate court as the Personal Representative of the Estate, on December 17, 2021, Velasquez Dolan, PA promptly filed its' Complaint against the Defendants of the Champlain Towers South Collapse Litigation.
- 11. I am the partner who oversaw the day-to-day activities in this litigation. I am also the sole attorney who worked on the case of the ESTATE OF LUIS FERNANDO BARTH TOBAR. The undersigned is continuing to provide extensive legal services in preparation for the upcoming damages hearing as well.

- 12. During the course of my representation of the Personal Representative and the Beneficiaries, I provided extensive legal services including, but not limited to:
  - a. Holding multiple meetings and conferences (3 to 4 times per month) with the Beneficiaries both in person and telephonically;
  - b. Drafting the 31-page Complaint in this case;
  - c. Participating in numerous conversations and electronic correspondence with the other attorneys representing victims of the collapse of CTS which benefitted my client;
  - d. Attending most scheduled hearings in this matter and discussing the status and outcome of these hearings with my client;
  - e. Monitoring the respective probate case in Colombia, ensuring I was apprised of all developments;
  - f. Preparation of claim forms and supporting evidence;
  - g. Hiring and consulting with an economic expert and psychology expert;
  - h. Engaging in telephone conferences and meetings with client's Colombian personal attorney regarding the status of this case, damages, and evidence to be presented at the scheduled damages hearing.
- 13. Significant time was expended in order to gather a multitude of relevant documentation regarding the decedent's wage loss, tax records, employment records, and school records all of which were translated by one of my certified paralegals. These documents were then provided to an expert economist retained by Velasquez Dolan, P.A., Bernard F. Pettingill, Jr., PHD, at an hourly rate. This cost is reflected in **Exhibit D** attached hereto.
- 14. Velasquez Dolan, P.A. also retained a neuropsychologist, Dr. Alejandro Arias, to interview and evaluate the psychological injuries of Marta Maria Tobar Molina as a result of the

untimely death of her son, LUIS FERNANDO BARTH TOBAR. This cost is reflected in **Exhibit D** attached hereto.

- 15. The details regarding my time and that of my paralegal in connection with the ESTATE OF LUIS FERNANDO BARTH TOBAR are reflected in computer records and supporting documentation prepared and maintained by Velazquez Dolan, P.A. in the ordinary course of our business. I have reviewed the printouts and documentation prior to the date of this Application for Legal Fees, Costs and Expenses.
- 16. During my review I confirmed, to the best of my ability, the accuracy of the time entries, the necessity for the work performed, the reasonableness of the time spent performing the work, and the time committed to this litigation. I waived fees related to any conversations with the Beneficiaries that were less than 30 minutes in duration. I eliminated any time that I considered duplicative of other work. I also adjusted time which I considered excessive for the task performed.
- 17. As a result of my review of the time entries and any adjustments, I believe that the time reflected in Velasquez Dolan P.A.'s lodestar calculation for which payment is sought is reasonable in amount and was necessary for the effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR as stated in the Florida Bar Rules of Professional Conduct.
- 18. The number of hours spent on this litigation by me is <u>75.5</u> hours. The number of hours spent on this litigation by my paralegal is <u>49.8</u>. Paralegal time was restricted to substantive work and communication with the clients as directed by me. See **Exhibit E** attached hereto and incorporated herein.
- 19. The lodestar amount for partner time based on the undersigned firm's current rates is \$950.00. This rate is reasonable and equal to or below the rate charged by other attorneys in

the legal community of South Florida in light of the undersigned's 34 years in practice; experience with trials and wrongful death cases; status as a board-certified trial lawyer since 2002; and experience with complex litigation.

- 20. The lodestar amount for a paralegal with over 15 years of experience is \$250.00. This rate is reasonable and commensurate with her experience and services provided in this case.
- 21. The total amount of legal fees for the services required for the reasonable, necessary, and effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR is \$84,175.00.
- An additional 11 hours of partner time and 5 hours of paralegal time, at a minimum, will be necessary for the preparation and effective representation of the ESTATE OF LUIS FERNANDO BARTH TOBAR at the upcoming damages hearing as well as to close out this case. This brings the total fees to \$95,875.00.
- 23. The total costs incurred by Velasquez Dolan, P.A. in connection with this matter currently is \$17,012.57. See **Exhibit D** which is attached hereto.
- 24. Lastly, following this Court's Sua Sponte Order On Attorneys' Fees Claims entered on June 27, 2022, the undersigned advised the Beneficiaries of the contents of the Order. The Beneficiaries were provided all of the facts and the status of the case as well as the "legal landscape." Nevertheless, the Beneficiaries and their Colombian personal legal counsel expressed to the undersigned that they would not be opposed to paying legal costs, expenses and fees as determined by this Honorable Court directly from their recovery in recognition of the extensive legal services, counsel, and attention (at all hours of the day and night) they received, so as not to affect the recovery of other victims and claimants.

- 25. Velasquez Dolan, P.A. hereby requests payment of legal fees and costs regarding the ESTATE OF LUIS FERNANDO BARTH TOBAR, as indicated above and/or as deemed reasonable, just, and equitable by this Honorable Court.
- 26. The Personal Representative of the ESTATE OF LUIS FERNANDO BARTH TOBAR, Sergio Barth Tobar, has been provided a true and correct copy of the foregoing Application For Award Of Legal Fees, Costs, And Expenses along with the exhibits.

Respectfully submitted,

Dated: 26th day of July, 2022

<u>/s/ Carlos A. Velasquez</u>

Carlos A. Velasquez, Esq.
Florida Bar No.: 755982
Velasquez Dolan, P.A.
Attorneys for Plaintiff
101 N. Pines Island Road, Suite 201
Ft. Lauderdale, Florida 33324
T:(954) 382-0533 / F:(954) 382-0585
Email: CVelasquez@vdlawyers.com
JanetP@vdlawyers.com

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to Florida Rule of Judicial Administration 2.516 and Florida Rule of Civil Procedure 1.080, on this <u>26th</u> day of July, 2022, a true and correct copy of the foregoing document was e-filed with the Clerk of the Court and served upon all counsel of record registered to receive service for this matter listed in Florida Courts E-Filing Portal.

/s/ Carlos A. Velasquez\_

Carlos A. Velasquez, Esq. Florida Bar No.: 755982

# **EXHIBIT B**

# TIME SUMMARY FOR LEGAL SERVICES RE: ESTATE OF LUIS FERNANDO BARTH

## **Probate Case**

Carlos A. Velasquez, Esq. –	10/15/2021 to 8/8/2022	4.0
Partner / Senior Counsel Time		

# <u>Litigation – Champlain Towers</u>

Carlos A. Velasquez, Esq. –	9/3/2021 to 8/8/2022	89.3
Partner / Senior Counsel Time		
Richard Dolan, Esq Partner	1/2021 to 8/5/2022	3.7
Christopher Velasquez, J.D.	8/5 to 8/8/2022	9.5
Janet Peralta, J.D. – Paralegal	7/19 to 7/26/22	4.8
Andrea Munoz – Registered	9/2/2021 to 7/29/2022	55.0
Paralegal		

# Composite

# **EXHIBIT C**

### VELASQUEZ DOLAN PA 101 N PINE ISLAND RD SUITE 201 FL 33324

# **Cost Statement**

Date 8/16/2022

То:			
ESTATE OF LUIS 210152	BARTH TOB	AR	

		Amount Due	Amount Enc.
		\$20,175.87	
Date	Transaction	Amount	Balance
10/21/2021	WILD FELICE & PARTNERS - RETAINER AND PROBATE FILING FEE	1,000.00	1,000.00
12/17/2021	SUMMONS FEE	103.50	1,103.50
12/17/2021	CLERK OF COURT FILING FEE	427.97	
01/17/2022	VERITEXT - SERVICE OF SUBPOENA/SUMMONS	62.25	1,531.47
01/17/2022	VERITEXT - SERVICE OF SUBPOENA/SUMMONS	62.25	1,593.72
01/17/2022	VERITEXT - SERVICE OF SUBPOENA/SUMMONS	62,25	1,655.97
01/19/2022	VERITEXT - SERVICE OF SUMMONSON TERRA GROUP, LLC	48.25	1,718.22
01/19/2022	VERITEXT - SERVICE OF SUMMONS ON TERRA WORLD	48.25	1,766.47
	INVESTMENTS	48.23	1,814.72
01/19/2022	VERITEXT - SERVICE OF SUMMONS ON BIZZI & PARTNERS DEVELOPMENT, LLC	128.25	1,942.97
01/19/2022	VERITEXT - SERVICE OF SUMMONS ON 8101 COLLINS DEVELOPMENT, LLC	45.00	1,987.97
01/19/2022	VERITEXT - SERVICE OF SUMMONS ON DESIMONE CONSULTING ENGINEERS, LLC	62.25	2,050.22
01/21/2022	VERITEXT - SERVICE OF SUMMONS ON CHAMPLAIN TOWERS SOUTH CONDOMINIUM ASSOC, INC.	93.25	2,143.47
02/14/2022	VERITEXT - SERVICE ON MORABITO CONSULTANTS, INC.	59.00	2,202,47
07/11/2022	BERNARD F. PETTINGILL, JR., PHD EXPERT FEE	1,800.00	4,002.47
07/13/2022	DR. ALEJANDRO ARIAS - PSYCHOLOGICAL EVALUATION FEE	2,500.00	•
07/13/2022	WILD FELICE & PARTNERS, PA - PREPARATION OF ESTATE DOCUMENTS	5,000.00	6,502.47 11,502.47
07/18/2022	BERNARD F. PETTINGILL, JR., PH.D. EXPERT FEE	4,612.50	16,114.97
07/18/2022	PHOTOCOPIES	162.60	
07/27/2022	PRESTIGE REPORTING SERVICE - TRANSCRIPT OF THE SWORN	520.10	16,277.57 16,797.67
	STATEMENT OF BERNARD PETTINGILL, PHD TAKEN ON 7/26/22	520.10	10,797.07
07/28/2022	BERNARD F. PETTINGILL, JR., PH.D VIDEO CONFERENCE AND PREPARATION TIME	562.50	17,360.17
07/30/2022	PRESTIGE REPORTING SERVICE - TRANSCRIPT OF THE SWORN STATEMENT OF LUZ ESTELLA ARANGO TAKEN ON 7/29/22	572,00	17,932.17
08/01/2022	PRESTIGE REPORTING SERVICE - TRANSCRIPT OF THE SWORN	632.70	10 ECA 05
	STATEMENT OF ALEJANDRO ARIAS, MD TAKEN ON 7/30/22	0.52.70	18,564.87
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\$20,175.87

### VELASQUEZ DOLAN PA 101 N PINE ISLAND RD SUITE 201 FL 33324

# **Cost Statement**

 Date	
 8/16/2022	

To:					
ESTATE 210152	OF LUIS I	BARTH	TOBAR		
210102			• .		

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	international design of the control	Amount Due	Amount Enc.
		\$20,175.87	
Date	Transaction	Amount	Balance
08/02/2022	PRESTIGE REPORTING SERVICE - TRANSCRIPT OF THE	100.00	18,664.87
08/02/2022	STATEMENT OF LUZ ESTELLA ARANGO TAKEN ON 8/1/22 PRESTIGE REPORTING SERVICE - TRANSCRIPT AND	<i></i>	
	ATTENDANCE OF COURT REPORTER AT SWORN STATEMENT OF	611.00	19,275.87
08/02/2022	LUZ ESTELLA ARANGO ON 8/1/22		
08/02/2022	PRESTIGE REPORTING SERVICE - VIDEO & TRANSCRIPT OF THE SWORN STATEMENT OF ALEJANDRO ARIAS, PSYD ON 7/30/22	100.00	19,375.87
08/02/2022	PRESTIGE REPORTING SERVICE - VIDEO & TRANSCRIPT OF THE	100.00	19,475.87
	SWORN STATEMENT OF BERNARD PETTINGILL, PHD TAKEN ON 1/26/22		* D. C.
08/08/2022	CERTIFIED LANGUAGE SERVICE - INTERPRETER SERVICE ON	700.00	20 17c 97
	08/01/22; 08/05/22; 08/08/22	700.00	20,175.87
			•
4			
		. [	

Amount Due \$20,175.87



### **Certified Language Services, LLC**

Involue

1.866.678.8575 CertifiedLang@gmail.com www.CertifiedLS.com

Date of Service	Invoice #
8/8/2022	m6178

#### Bill To

Velasquez, Dolan, Arias P.A. 101 N Pine Island Rd, Suite 201 Plantation, FL 33324

#### Make Check Payable To

Certified Language Services, LLC P.O. Box 170153 Hialeah, FL 33017-0153

Or Send Payment by Zelle to: CertifiedLang@gmail.com

TIN: 75-3259168

NOTE: Please indicate invoice number on payment. Credit/debit card payments are accepted by telephone with a 4% surcharge.

		Terms	Due Date
		Net 30	9/7/2022
Quantity	Description	Rate	Amount
	Case # 2021-015089-CA-01 Re: Champlain Towers South Collapse Litigation Attorney: Carlos Velasquez, Esq.		
.2	Day 1: Monday, August 1, 2022 Hours of Virtual Spanish Interpreting in a Sworn Statement Witness:Luz Estella Arango Start: 4:00pm   End: 4: 35pm (2-hr min)	110.00	220.00
2	Day 2: Friday, August 5. 2022 Hours of Virtual Spanish Interpreting in a Hearing Prep Witnesses: Marta Maria Tobar (mother/claimant) Sergio Barth Tobar (brother/claimant) Santiago Dorado (cousin) Start: 11:00am   End: 11:30am (2-hr min)	110.00	220.00
	Day 3: Monday, August 8, 2022 Hours of In-Person Spanish Interpreting in a Hearing Place: 155 N.W. 3rd Street Courtroom 13360 Miami, FL 33128 Judge: Michael Hanzman Marta Maria Tobar (mother/claimant) Sergio Barth Tobar (brother/claimant) Santiago Dorado (cousin) Start: 9:00am   End: 11:00am (2-hr min)	130.00	260.00
COLUMN TO THE TAXABLE STATE OF TAXABLE STAT		Payments/Credits	\$0.00

Prestige Reporting Service, Inc.

633 South Andrews Avenue | Suite 202 | Fort Lauderdale, FL 33301 (954) 764-7297 | info@prestigereportingservice.com

### STATEMENT

Statement Date: 08/02/2022

Velasquez Dolan, P.A.

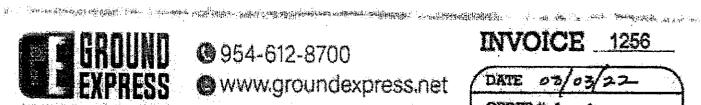
ATTN: Carlos A. Velasquez, Esquire

101 N Pine Island Rd Ste 201 Plantation, FL 33324-1843

Invoice	Date	Reference	Amount	Due
110392	07/27/2022	Bernard Pettingill, Ph.D Re: Champlain Towers - Attendance Date: 07/26/2022	520.10	520.10
110437	07/30/2022	Luz Estella Arango - Re: Champlain Towers - Attendance Date: 07/29/2022	572.00	572.00
110442	08/01/2022	Alejandro Arias, PsyD - Re: Champlain Towers - Attendance Date: 07/30/2022	632.70	632.70
110456	08/02/2022	Luz Estella Arango - Re: Champlain Towers - Attendance Date: 08/01/2022	611.00	611.00
110463	08/02/2022	Luz Estella Arango - Re: Champlain Towers - Attendance Date: 08/01/2022	100.00	100.00
110464	08/02/2022	Alejandro Arias, PsyD - Re: Champlain Towers - Attendance Date: 07/30/2022	100.00	100.00
110465	08/02/2022	Bernard Pettingill, Ph.D Re: Champlain Towers - Attendance Date: 07/26/2022	100.00	100.00
		Total Amo	ount Due:	2635.80

<sup>\*</sup>Contact us immediately for any billing disputes. Charges will be deemed valid after 30 days. Past due balances will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including attorney's fees. Payment is not contingent upon client reimbursement.

Tax ID: 65-0025557



**©** 954-612-8700

www.groundexpress.net

ORDER# CARCUM

SIGNATURE

COANTITY	Pine Island Ad. Imh	PRICE	<b>AMORA</b>
	70		700.
	Honorable Judge Mi	clinel Iman	ZMM
	ATTN: MARIN		
	MIMI - Drile Childre	ins borntho	سعد
	155 NW 3rd of. Reg	13360	
	MIAMI E2. 33,128	205-989-	1672
<u> </u>			
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