

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

IN RE: CHAMPLAIN TOWERS SOUTH
COLLAPSE LITIGATION,

CLASS REPRESENTATION

CASE NO.: 2021-015089-CA-01

COMPLEX BUSINESS
LITIGATION DIVISION

APPLICATION FOR FEES AND COSTS

Pursuant to the Court's August 3, 2022 *Sua Sponte Order on Supplemental Attorneys' Fees Applications* ("Sua Sponte Order"), the law firm of Podhurst Orseck, P.A. ("Podhurst Orseck"), respectfully requests attorneys' fees that have been voluntarily discounted by Podhurst Orseck as noted in the attached Declaration, Exhibit "A", for its work during the CTS Claims process in favor of wrongful death claimants. Common Benefit time and cost reimbursement is requested in the application. Composite Exhibit "A" to the Declaration, reflecting the firm's detailed invoices, is being contemporaneously submitted *in camera* for review consistent with the Court's *Sua Sponte Order*.

WHEREFORE, Podhurst Orseck, P.A., respectfully requests attorneys' fees and costs as reflected in the attached Declaration.

Dated: August 26, 2022

Respectfully submitted,

/s/ Ricardo M. Martinez-Cid
Aaron S. Podhurst (FBN 63606)
Ricardo M. Martínez-Cid (FBN 383988)
Lea P. Bucciero (FBN 84763)
PODHURST ORSECK, P.A.
1 SE 3rd Avenue, Suite 2300
Miami, FL 33131
Tel: (305) 358-2800
rmcid@podhurst.com
*Plaintiffs' Personal Injury and Wrongful
Death Track Lead Counsel*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court using the Florida Courts E-Filing Portal thereby serving electronic notice to all counsel of record on this 26th day of August, 2022.

PODHURST ORSECK, P.A.
SunTrust International Center
One SE Third Avenue, Suite 2300
Miami, FL 33131
Telephone: (305) 358-2800
Fax: (305) 358-2382

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PODHURST ORSECK, P.A.
1 SE 3rd Avenue, Suite 2300
Miami, FL 33131
Tel: (305) 358-2800
rmcid@podhurst.com

*Plaintiffs' Personal Injury and Wrongful
Death Track Lead Counsel*

EXHIBIT A

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

CASE NO.: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

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

**DECLARATION OF COURT APPOINTED CLASS COUNSEL RICARDO MARTINEZ-
CID FILED ON BEHALF OF THE FIRM OF PODHURST ORSECK, P.A. IN SUPPORT
OF APPLICATION FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES**

I, Ricardo M. Martinez-Cid, do hereby declare and state as follows:

1. I am a Partner at Podhurst Orseck, P.A. (“Podhurst Orseck”) and Court appointed as **Plaintiffs’ Personal Injury and Wrongful Death Track Lead Counsel** in the above-entitled action. I submit this declaration in further support of Class Counsel’s unified Fee Application filed June 12, 2022, and **Podhurst Orseck’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. This declaration details my work on this case from June 1, 2022, forward, and supplements **Podhurst Orseck’s** submissions to the Court in connection with the June 12, 2022, Fee Application.

2. Over the past several months, I and other members of my firm provided legal services to class members in connection with the claims process administered by the Court. These services included assisting our clients with 30 wrongful death and 17 property claims forms, working with them to gather the documents necessary for submission to the Court, interviewing over 120 witnesses and creating videos to provide the Court with critical context for each client’s individual loss, working with an expert economist regarding economic loss calculations and 14 expert economic loss reports, and preparing submission binders and attending 18 claims administration hearings involving 24 of the deceased victims from the Champlain Towers South Collapse.

3. In addition to the allocation work on behalf of individual claimants, our firm is one of the few which continued to work on critical common benefit work which was required to ensure the successful and issue-free funding of the global settlement.

4. 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 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.

5. The number of hours spent on these matters by my firm from June 1, 2022, and anticipated through the completion of this case is **1,340.6**, which results in a lodestar of **\$746,034.50** (including \$92,631.50 in non-allocation common benefit work). A breakdown of the lodestar is provided in **Exhibit A**. The lodestar amount for attorney and paralegal (or attorney/paraprofessional) time based on the firm's current rates is **\$746,034.50**. The hourly rates shown in **Exhibit A** are the usual and customary rates set by the firm for each individual attorney, paralegal or other paraprofessional. The chart set forth as **Exhibit A** was prepared from contemporaneous daily time records of the firm.

6. Additionally, **Podhurst Orseck** 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 a detailed breakdown of the time spent on this matter.

7. 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 Podhurst Orseck. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. Podhurst Orseck's expenses and charges in connection with the prosecution of this litigation total **\$200,598.56**. These include charges separated by Common Benefit and individual matters.

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

Executed this 26th day of August, 2022 at Miami, Florida.

/s/ Ricardo M. Martinez-Cid

Ricardo M. Martinez-Cid

EXHIBIT A

IN RE: CHAMPLAIN TOWERS SOUTH COLLAPSE LITIGATION

TIME REPORT

FIRM NAME: Podhurst Orseck, PA

REPORTING PERIOD: June 1, 2022 to conclusion

Name (Status: P, A, Counsel, Para, Clerk)	Total Hours	Hourly Rate	Total Lodestar
Barrington, Lauren, Counsel	9.9	590	\$5,841.00
Bucciero, Lea, Partner	70.3	755	\$53,076.50
Bucciero, Lea, Partner	217.6	755	\$164,288.00
Calvo, Bryan, Clerk	2	315	\$630.00
Estevez, Marta, Paralegal	5.4	345	\$1,863.00
Estevez, Marta, Paralegal	532.8	345	\$184,176.00
Groseclose, Audrey, Counsel	22.3	590	\$13,157.00
Herter, Caroline, Counsel	30.7	455	\$13,968.50
Martinez, Marisol, Paralegal	115.3	345	\$39,778.50
Martinez-Cid, Ricardo, Partner	19.6	895	\$17,542.00
Martinez-Cid, Ricardo, Partner	228.5	895	\$204,507.50
Palacio, Gina, Paralegal	64.2	345	\$22,149.00
Podhurst, Aaron, Partner	15.5	1300	\$20,150.00
Rasco, Ramon, Partner	6.5	755	\$4,907.50
TOTALS	1,340.6		\$746,034.50

*Entries in blue reflect time spent representing individual class member claimants in the allocation process.