

**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**

**NOTICE OF FILING SUPPLEMENTAL ATTORNEYS' FEES BY GOLDBERG &
ROSEN, P.A.**

COMES NOW, the firm of Goldberg & Rosen, P.A., and hereby files its *Supplemental Declaration of Court Appointed Counsel, Judd Rosen, Esq., of the Firm of Goldberg & Rosen, P.A. in Support of Application for Award of Attorneys' Fees, Costs, and Expenses.*

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served by Electronic Service via the Florida Courts E-filing E-portal pursuant to the Supreme Court Administrative Order AOSC13-49 on this **26th day of August, 2022.**

GOLDBERG & ROSEN, P.A.

Counsel for Plaintiff(s)

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/s Judd Rosen

BY

Judd G. Rosen, Esq., Fla. Bar No. 0458953

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**IN RE: CHAMPLAIN TOWERS SOUTH
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**DECLARATION OF COURT APPOINTED CLASS COUNSEL, JUDD G. ROSEN, ESQ.,
FILED ON BEHALF OF THE FIRM OF GOLDBERG & ROSEN, P.A. IN SUPPORT OF
APPLICATION FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES**

I, Judd Rosen, do hereby declare and state as follows:

1. I am the Managing Partner of Goldberg & Rosen, P.A. (“the Firm”) and Court appointed counsel for the subclass of non-unit owner victims and member of the Plaintiff Steering Committee Member, etc. in the above-entitled action. I submit this declaration in further support of Class Counsel’s unified Fee Application filed June 12, 2022, and Firm’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 Firm’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 representing Jonah Handler, Kevin Fang as Personal Representative of the Estate of Stacie Fang, and Joseph Blasser as survivor and surviving spouse of the Estate of Elena Blasser. We retained experts, interviewed witnesses and prepared detailed video and live presentations for the Court on behalf of the abovementioned clients.

3. 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.

4. The number of hours spent on these matters by my firm from June 1, 2022, until August 25, 2022, is 146.3 which results in a lodestar of \$142,605.00. A breakdown of the lodestar is provided in **Exhibit A**. 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. Additionally, Todd Rosen, Esq. of the Todd Rosen Law Group affiliated with our firm and expended hours on behalf of the Estate of Stacie Fang and Jonah Handler individually. His time sheets are incorporated into the attached **Exhibit A**.

5. Additionally, the Firm 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 and are reflected in **Exhibit A** as well.

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

7. Additionally, the Firm also consulted with appellate counsel, Eaton & Wolk, for common benefit and client purposes during the pendency of the litigation. Eaton & Wolk's affidavit in support of its fees are attached as **Exhibit B**.

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

Executed this 25th of August, 2022 at Miami, Florida.

/s/ Judd Rosen

Judd Rosen

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CASE NO.: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

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

**DECLARATION OF CONSULTING ATTORNEY DOUGLAS F. EATON FILED ON
BEHALF OF THE FIRM OF EATON & WOLK PL IN SUPPORT OF APPLICATION
FOR AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES**

I, Douglas F. Eaton, do hereby declare and state as follows:

1. I am the Managing Member of Eaton & Wolk PL ("Eaton Wolk"). I frequently provide trial support and appellate services to Goldberg and Rosen ("FIRM"), the Court appointed Class Counsel in the above-entitled action. I was retained by FIRM as consulting counsel to assist FIRM on various issues related to class certification and allocation, which I provided in late 2021 and early 2022. I submit this declaration in further support of Class Counsel's unified Fee Application filed June 12, 2022, and FIRM'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 all of my work on this case and supplements FIRM's submissions to the Court in connection with the June 12, 2022, Fee Application.

2. Between October, 2021 and January 2022, I provided a provided legal services to class members in connection with the claims process administered by the Court. These services included consultation with FIRM on issues relating to conflict of interest, class membership issues, and allocation of payments. I conducted research on the various topics and offered my opinions and expertise to FIRM regarding same.

3. The information in this declaration regarding my firm's time is documented and reflected in a spreadsheet of my time prepared by me 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 kept my time contemporaneously with my activities and personally created the timesheet accompanying this declaration.

4. The number of hours spent on these matters by my firm from October 15, 2021, until August 25, 2022, is 8.7, which results in a lodestar of \$8,170. A breakdown of the lodestar is provided in **Exhibit A**. The lodestar amount for attorney time based on the firm's current rates is \$950/hour. The hourly rates shown in **Exhibit A** are the usual and customary rates set by the firm for each individual attorney. The chart set forth as **Exhibit A** was prepared from my contemporaneous daily time records.

5. The time for which payment is sought as set forth in this declaration is reasonable in amount and were necessary for the effective and efficient presentation of the class members' claims.

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

Executed this 22nd of August, 2022 at Miami, Florida.

/s/

A handwritten signature in black ink, appearing to be "JL" or similar, written over a horizontal line.

[Name]