

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

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Thomas J. Rebull

In Re:

Champlain Towers South Collapse Litigation.

MOTION FOR STATUS CONFERENCE

Michael I. Goldberg (the “Receiver”), pursuant to Rule 4 of the Complex Business Litigation Rules, files this Motion For a Status Conference, respectfully requesting that the Court schedule a status conference to address two pending issues outlined below.

1. This case arises out of the tragic collapse of the Champlain Towers South Condominium located at 8777 Collins Avenue, Surfside, Florida 33154 (the “Property”) on June 24, 2021.

2. At a hearing conducted on July 2, 2021 (the “Commencement Date”), the Court ordered the appointment of Michael I. Goldberg as Receiver for the Association.

3. There are several pending post-settlement issues relating to: (1) the return of recovered personal property items (for which there are multiple victims making claims for the same items); and (2) a third distribution of excess accrued cash to the personal injury and wrongful death claimholders.¹

Disputed Claims for Recovered Personal Property Items

4. By way of brief background as to the personal property claims, following the collapse of the Champlain Tower South Condominium, Miami-Dade County recovered and decontaminated close to 10,000 personal property items from the rubble.

¹ The Receiver has filed a Motion To Distribute an Additional \$4.8 Million to Victims With Awards simultaneously to the filing of this motion.

5. If the personal property and a form of identification were contained within an enclosed receptacle, the personal property was decontaminated and returned to the individual listed on the identification.

6. With respect to the approximately 7,000 recovered personal property items for which ownership could not be facially determined, claims processes and protocols were established per Court Order. *See* Orders attached. Specifically, the Receiver set up a website whereby victims and/or their families could view recovered property and “claim” ownership thereof. To the extent only one individual claimed an item through the claims process, the Court authorized release of such items. Those items have been available for pick up by the claimants at MDPD.

7. As for those items where more than one individual claimed the same item, a protocol has been established (and is currently ongoing), whereby the claimants were provided an opportunity to submit evidence of ownership, documentation, photographs and/or other proof the items claimed belonged to them. Upon completion of the extended claims submission deadline, the Receiver has been reviewing the evidence submitted and preparing reports and recommendations² as to whom the items should be released, if possible. In many instances, no determination can be made (due to lack of evidence or competing evidence), and reports and recommendations are issued indicating that no determination is being made. Once the reports and recommendations are issued, the claimants have an opportunity to submit objections to the Receiver.

8. With respect to any objections received, the following procedure was put in place, as set forth in each report and recommendation:

If the Receiver receives any objections, the following can occur:

² A sample Report and Recommendation is attached for this Court’s convenience.

1. If after considering the objection(s) and any additional evidence and conducting any follow-up interviews or investigation he deems necessary, the Receiver may decide not to change the determination in this Report and Recommendation. If that occurs, the Receiver will notify all Claimants of his final decision by email. Any Claimant(s) still objecting to the decision will have one week from the date of the Receiver's email to notify the Receiver in writing by email that they continue to object. If that occurs, the Receiver will then file this Report and Recommendation (along with any related documentation) with the Court, and the objecting Claimant(s) will have an opportunity to file a written response with the Court through a process the Receiver will explain at that time. If, however, there are no further objections, this Report and Recommendation will become final without any further action.

OR

2. If after considering the objection(s) and any additional evidence and conducting any follow-up interviews or investigation he deems necessary, the Receiver may decide to revise the determination in this Report and Recommendation. If that occurs, the Receiver will send all Claimants the Revised Report and Recommendation by email. Any Claimant(s) objecting to the Revised Report and Recommendation will have two weeks from the date of the Receiver's email to notify the Receiver in writing by email of their objection(s) to the Revised Report and Recommendation. If that occurs, the Receiver will then file the Revised Report and Recommendation (and any related documents) with the Court, and the objecting Claimant(s) will have an opportunity to file a written response with the Court through a process the Receiver will explain at that time. If, however, there are no further objections, the Revised Report and Recommendation will become final without any further action.

For any Report and Recommendations filed with the Court, the Court may adopt the Receiver's Report and Recommendation or conduct further hearings if it deems it necessary.

9. At the conclusion of the first claims process, there are 810 items for which competing claims have been made.³ Out of those items, the Receiver has issued several hundred reports and recommendations, with more being released weekly. Of the reports and recommendations that have been issued, the Receiver has received 19 objections (with the objection period still open on

³ A second claims process is underway as well.

more than 20 reports and recommendations), some of which may need to be resolved ultimately by the Court.

10. This protocol anticipates this Court's further action with regard to pending objections that may remain after the Receiver reviews the objections and determines whether to revise any of the Reports. The protocol also states that the Receiver will provide notice of the claimant/objectors of such process. The Receiver seeks this Court's guidance as to the administrative process it intends to utilize to handle pending objections.

Third Distribution of Cash

11. The Receiver seeks to make a third distribution of cash to wrongful death and personal injury claimants. The distribution consists of excess funds accrued, including interest income accrued and the release of funds previously held back to satisfy potential income tax obligations that are no longer of concern.

12. By separate motion filed contemporaneously herewith, the Receiver seeks this Court's authorization to make such distributions.

Accordingly, the Receiver respectfully requests the Court conduct a brief status conference to address the issues above as soon as the Court's calendar permits and grant such other and further relief as is deemed just and proper.

Dated: February 22, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 22, 2024, a copy of the foregoing was electronically filed with the Clerk of Court by using the Florida Courts E-Filing Portal and a copy of same was furnished to all counsel of record through the Florida Court's E-Filing Portal.

By: /s/ Michael I. Goldberg

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

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

Manuel Drezner

Plaintiff(s)

vs.

Champlain Towers South Condominium Association Inc

Defendant(s)

_____ /

**ORDER GRANTING RECEIVER'S MOTION FOR ENTRY OF AN ORDER
APPROVING PROTOCOL FOR PROCESSING AND RETURNING PERSONAL
PROPERTY ITEMS TO VICTIMS AND CASH FOUND AT THE PROPERTY**

THIS CAUSE came before the Court on September 30, 2021, at 9:00 a.m. on the *Receiver's Motion for Entry of An Order Approving Protocol for Processing and Returning Personal Property Items to Victims and Cash Found at the Property*. [DE 159]. The Court, having considered the Motion, having heard the argument of counsel, being otherwise fully advised in the premises, and for the reasons announced on the record of the Hearing, which are incorporated as though fully set forth herein, **ORDERS AND ADJUDGES** as follows:

1. The Receiver's Motion is **GRANTED** as set forth herein.

2. Following the collapse of the Champlain Tower South, first responders recovered numerous items of personal property (including "hard" property items which do not include clothing and other porous items), approximately \$750,000 in cash and 17 safes at the Property. The Receiver shall utilize and comply with the following protocols in attempting to identify the rightful owners of the property items and cash and returning them to their rightful owners and/or

Personal Representatives.

3. With respect to recovered “hard” property items for which the rightful owner is not readily identifiable, once the property has been decontaminated by Miami-Dade County, the Receiver will number each piece of property and photograph each of them. Thereafter, the Receiver will upload the photographs onto the Receiver’s website (www.CTSReceivership.com) in a limited access area of the website.

4. Next, the Receiver will provide notice to the victims and/or their Personal Representatives that the photographs have been posted and will also provide the requisite information necessary to securely access the photographs on the Receiver’s website.

5. The photographs will be accessible for 30 days. During the 30 day period, victims and/or their Personal Representatives will be able to submit claims to the Receiver for personal property items. Such claims shall be submitted on the Receiver’s website through a claim form prepared by the Receiver which will be posted on his website, along with proper identification.

6. At the expiration of the 30 day period, with respect to all personal property items for which only one party has made a claim, the Receiver will file a motion seeking the Court’s authorization to release those personal property items to the claimant (provided the claimant presents proper identification and proof of entitlement).

7. At the expiration of the 30 day period, with respect to all personal property items for which more than one party has made a claim, the Receiver will notify the competing claimants. Each party making a claim to such items shall provide the Receiver with evidence establishing proof of his/her entitlement to the respective personal property item(s). If the Receiver is unable to resolve a disputed claim, the Receiver will request that the Court hold a hearing to determine the proper claimant and authorize the Receiver to release the personal property items.

8. The County has recovered 17 safes which are in varying conditions. The County will decontaminate the exteriors of the safes. Thereafter, the Receiver, along with a locksmith and in the presence of County officials, will access the contents of each of the safes and take a detailed inventory of their contents.

9. To the extent the owner of a safe is identifiable from reviewing its contents, the Receiver will file a motion seeking the Court's authorization to release the contents to the owner or the owner's Personal Representative, as the case may be.

10. To the extent the rightful owner of a safe cannot be identified from the contents, the Receiver will follow the same protocol utilized for hard personal property items, as set forth in paragraphs 2-7 of this Order.

11. If property items remain unclaimed or no one can provide the Receiver and Court with an acceptable description of the contents of the safe or other reliable evidence demonstrating ownership, the Receiver will maintain such items pending further order of the Court.

12. With respect to U.S. currency that was recovered at the site, all paper bills, whether identifiable to a particular owner or not, will be turned over to the United States Treasury to be destroyed in accordance with applicable law. Thereafter, the United States Treasury will issue a check to the Receiver for the amount turned over.

13. The Receiver has been advised that the U.S. currency turned over to the United States Treasury must be transported to Washington, D.C. by armored car. The Receiver is authorized to advance the cost of the armored car transportation (or such other reasonable secure transport method) and thereafter reimburse the receivership estate from the recovered funds when the Receiver receives the funds from the United States Treasury.

14. No later than midnight, prevailing Eastern Time on November 30, 2021, any individual claiming ownership to any of the cash found at the property shall submit a Proof of Claim for Cash Form (“POC Forms”), which will be posted on the Receiver’s website, along with any required documentation to the Receiver. POC Forms and documentation submitted after midnight, prevailing Eastern Time on November 30, 2021, will not be considered.

15. Once the United States Treasury issues a check to the Receiver and the Receiver has reviewed the POC Forms and documentation, with respect to any cash identifiable to a particular owner, the Receiver will file a motion with the Court seeking authorization to pay the claimant the amount allowed by the Court.

16. An individual’s acceptance of the property referenced in this Order shall constitute a waiver of any and all claims against the County and the Receiver with respect to the personal property, including but not limited to, any claims or damages relating to toxins or other hazardous materials, if any, remaining on the personal property.

17. Neither the Receiver nor the County shall be held responsible for the turnover of personal property or currency inadvertently to the wrong person so long as the Receiver follows the procedures set forth herein.

18. This Court shall retain jurisdiction of this matter for all purposes.

DONE and **ORDERED** in Chambers at Miami-Dade County, Florida on this 1st day of October, 2021.



2021-015089-CA-01 10-01-2021 5:44 PM

Hon. Michael Hanzman

CIRCUIT COURT JUDGE

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

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Physically Served:

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL
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CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Michael Hanzman

In Re:

Champlain Towers South Collapse Litigation

**RECEIVER'S MOTION FOR ENTRY OF AN ORDER
APPROVING CLARIFIED PROTOCOL FOR RESOLUTION
OF COMPETING CLAIMS FOR PERSONAL PROPERTY ITEMS**

Michael I. Goldberg (the "Receiver"), pursuant to Rule 4 of the Complex Business Litigation Rules, files this Motion For Entry of an Order Approving Clarified Protocol for Resolution of Competing Claims for Personal Property Items. In support of this Motion, the Receiver states as follows:

1. On October 1, 2021, this Court entered an Order Approving Protocol for Processing and Returning Personal Property Items. In pertinent part, the Order provides:

At the expiration of the 30 day period, with respect to all personal property items for which more than one party has made a claim, the Receiver will notify the competing claimants. Each party making a claim to such items shall provide the Receiver with evidence establishing proof of his/her entitlement to the respective personal property item(s). If the Receiver is unable to resolve a disputed claim, the Receiver will request that the Court hold a hearing to determine the proper claimant and authorize the Receiver to release the personal property items.

2. Following the close of the claims process and after reconciling claims data, numerous personal property items have been identified as having competing claims.¹

¹ Presently, some of the competing claims are based on draft, unfinalized claims. As set forth in the Court's December 5, 2022 Order, claimants have until January 11, 2023 to finalize their claims or they become abandoned. To the extent draft claims do not become finalized by January 11, 2023, the draft claim will not create a conflict. Therefore, the Receiver will make

3. Based on the protocol set forth in the October 1, 2021 Order, the Receiver will notify competing claimants of the item(s) they have claimed for which there is/are competing claims. The notification will advise the competing claimants that they will need to submit to the Receiver whatever evidence (i.e., photographs, receipts, invoices or other documentation) they have supporting proof of entitlement and/or a written explanation supporting claimant(s)' proof of entitlement for each contested item listed in the notification. Claimants will need to attest to the truth of the information provided. They will have two weeks from the date of the notification (such date certain will be specifically stated in the notification) to provide the Receiver the information, unless otherwise extended by the Receiver for good cause.

4. Following receipt of the evidence and written explanations, the Receiver will review such information and issue a written report and recommendation as to which claimant the property should be released. Claimants will have two weeks to object to the Receiver's report and recommendation via a written objection explaining the basis for the objection, emailed to the Receiver at ctsreceivership@akerman.com.

5. For every personal property item for which the Receiver does not receive any objections by the deadline, the report and recommendation for each such personal property item will become final. The Receiver will then notify the claimant(s) of the final determination, and Miami-Dade County will thereafter be authorized to release those identified personal property items to the identified claimant(s).

6. Upon receiving any objection(s), the Receiver may reconsider the competing claims. Claimants may submit additional evidence to the Receiver by a specified deadline.

the final determination of which items have competing claims following the January 11, 2023 deadline.

7. If the Receiver deems it necessary, he may interview the competing claimants and seek such other additional information as he deems necessary to assist in making a determination as to the proper claimant for a particular personal property item.

8. If the Receiver is unable to resolve a disputed claim after the first two proceedings, the Receiver will file his report and recommendation with the Court, and the Court may adopt the Receiver's report and recommendation or conduct further hearings if he deems it necessary.

Receiver's Authority

9. Florida trial courts have broad and inherent discretion to appoint a receiver and establish the receiver's duties. *See Granada Lakes Villas Condo. Ass'n v. Metro-Dade Invs. Co.*, 125 So. 3d 756, 758 (Fla. 2013); *see also Ross-Williams v. Leali*, 337 So. 3d 523, 526 (Fla. 3d DCA 2022). Accordingly, the court may use its discretion during the pendency of the action to "make such further orders as are necessary and proper for the protection of the property and interests concerned." *Puma Enters. Corp. v. Vitale*, 566 So. 2d 1343, 1345 (Fla. 3d DCA 1990) (quoting *Abramson v. Brant*, 141 So. 2d 777, 778 (Fla. 3d DCA), *cert. denied*, 146 So. 2d 752 (Fla. 1962)).

10. Because the trial court possesses such wide discretion, it has the authority "to classify claims sensibly in receivership proceedings." *S.E.C. v. Enter. Trust Co.*, 559 F.3d 649, 652 (7th Cir. 2009); *S.E.C. v. Basic Energy & Affiliated Res., Inc.*, 273 F.3d 657, 670 (6th Cir. 2001) ("Thus, the district court used its discretion in a logical way to divide the money, and therefore, did not abuse its discretion in approving the plan.").

11. The trial court's broad discretion stems from the "inherent powers of an equity court to fashion relief." *SEC v. Elliott*, 953 F.2d 1560, 1560 (11th Cir. 1992). As such, in granting relief, it is appropriate for the trial court to use summary proceedings. *Id.* The court's

use of summary proceedings in the course of overseeing a receivership must comply with due process. *Basic Energy*, 273 F.3d at 668. A trial court's use of summary proceedings complies with due process if the parties are permitted "to present evidence when the facts are in dispute and to make arguments regarding those facts." *Elliott*, 953 F.2d at 1567.

12. Summary proceedings allow for efficient adjudication of claims without overburdening the court. They both reduce the time necessary to settle disputes and decrease litigation costs. *Id.* 953 F.2d at 1566.

WHEREFORE, the Receiver respectfully requests that the Court enter an Order approving the clarified protocol set forth herein for processing competing personal property claims.

Date: January 2, 2023

Respectfully submitted,

/s/ Michael I. Goldberg

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 2, 2023, a copy of the foregoing was electronically filed with the Clerk of Court by using the Florida Courts E-Filing Portal and a copy of same was furnished to all counsel of record through the Florida Court's E-Filing Portal.

/s/ Michael I. Goldberg

Michael I. Goldberg, Esq.

**IN THE CIRCUIT COURT OF THE ELEVENTH 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

Plaintiff(s)

vs.

N/A

Defendant(s)

_____ /

**ORDER ON RECEIVER'S MOTION FOR ENTRY OF AN ORDER APPROVING
CLARIFIED PROTOCOL FOR RESOLUTION OF COMPETING CLAIMS FOR
PERSONAL PROPERTY ITEMS**

This cause is before the Court upon “Receiver’s Motion for Entry of an Order Approving Clarified Protocol for Resolution of Competing Claims for Personal Property Items.” (D. E. 1018). Upon review of the Motion, it is hereby **ORDERED**:

The Motion is **GRANTED**. The Receiver’s proposed protocol is approved.

DONE and **ORDERED** in Chambers at Miami-Dade County, Florida on this 12th day of January, 2023.



2021-015089-CA-01 01-12-2023 5:48 PM

Hon. Michael Hanzman

CIRCUIT COURT JUDGE

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

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Physically Served:

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

CASE NO: 2021-015089-CA-01

SECTION: CA43

JUDGE: Thomas Rebull

In Re:

Champlain Towers South Collapse Litigation

SAMPLE REPORT AND RECOMMENDATION

Michael I. Goldberg (the “Receiver”), pursuant to the Court’s Order of January 12, 2023 Approving Clarified Protocol For Resolution Of Competing Claims For Personal Property Items (“Clarified Protocol Order”), files this Report and Recommendation for Personal Property Item XX-XXX-X, identified as a XXXXXX (the “Item”). In support, the Receiver states:

Background

On October 1, 2021, this Court entered an Order Approving Protocol For Processing And Returning Personal Property Items (“Protocol Order”). In pertinent part, the Protocol Order established a process for the Receiver to allow victims of the Champlain Towers South collapse to claim personal property items recovered from the site. Following that process, the Receiver was able to return thousands of personal property items to their rightful owners.

However, the process also resulted in competing claims on more than 800 items, consisting of jewelry, coins, silverware, dishes, heirlooms, and other miscellaneous items. As a result, on January 2, 2023, the Receiver filed a subsequent motion asking the Court to approve a clarified protocol for resolving those competing claims. The Court entered the Clarified Protocol Order on January 12, 2023, approving the Receiver’s proposed process.

Under the Clarified Protocol Order, the Receiver notified Claimants of item(s) they claimed for which there were competing claims. The notifications advised the competing Claimants that

they had to submit to the Receiver whatever evidence (i.e., photographs, receipts, invoices or other documentation) they had supporting proof of their claim for each item. The notifications also informed the Claimants that they should submit a form provided to them with any further written explanation about their claim. The form also required them to attest to the truth of the information provided. Following receipt of the evidence and written attestations, the Receiver has reviewed the information provided and, pursuant to the Clarified Protocol Order, is now providing a written Report and Recommendation as to the proposed disposition of each disputed item.

Item XX-XXX-X

Item XX-XXX-X is identified as a XXX. Three victims of the collapse claimed the Item: Claimant Numbers 1, 2 and 3 (collectively “Claimants”).

Claimant 1’s electronic claim form stated this XXXX was part of his collection. Before it was known what items were recovered, Claimant 1 submitted claims on the MDPD Surfside Families website for various items, including similar items, and uploaded photos of similar items. Claimant 1 also submitted an Attestation Form with photos of his collection, including photos.

Claimant 2 submitted a blank electronic claim form. Claimant 2 did not submit an Attestation Form. Claimant 2 submitted claims on the MDPD Surfside Families website for various items, but did not specifically list or describe this Item. Claimant 2 did not provide any statements or evidence of ownership for this Item.

Claimant 3 submitted a blank electronic claim form. Claimant 3 did not submit an Attestation Form. Claimant 3 submitted claims on the MDPD Surfside Families website for various items, but did not specifically list or describe this Item. Claimant 3 did not provide any statements or evidence of ownership for this Item.

Because Claimant 1 referenced and provided evidence of a collection and stated this card was part of his collection on the electronic claim form, listed these items and submitted photos of

the same on the MDPD Surfside Families website before it was known what items were recovered, and submitted an Attestation Form with photos of similar items, and because neither of the other two Claimants submitted any proof that they owned this Item, the Receiver has determined that Item XX-XXX-XX should be released to Claimant 1.

Further Proceedings

Pursuant to the Clarified Protocol Order, Claimants for this Item will have two weeks from the date the Receiver sends this Report and Recommendation to object to it in writing, explaining the basis for the objection(s) and containing any additional evidence the Claimant(s) wish(es) to submit. The objection(s) should be emailed to the Receiver at ctsreceivership@akerman.com no later than **11:59 p.m. EST on March 6, 2024**. If the Receiver does not receive any objections by the deadline, this Report and Recommendation will become final without any further action, and the Receiver will authorize Miami-Dade County to release this Item to Claimant 1.¹

If the Receiver receives any objections, the following can occur:

1. If after considering the objection(s) and any additional evidence, and conducting any follow-up interviews or investigation he deems necessary, the Receiver may decide not to change the determination in this Report and Recommendation. If that occurs, the Receiver will notify all Claimants of his final decision by email. Any Claimant(s) still objecting to the decision will have one week from the date of the Receiver's email to notify the Receiver in writing by email that they continue to object. If that occurs, the Receiver will then file this Report and Recommendation (along with any related documentation) with the Court, and the objecting Claimant(s) will have an opportunity to file a written response with the Court through a process the Receiver will explain at that time. If, however, there are no further objections, this Report and Recommendation will become final without any further action.

OR

¹ Consistent with the prior Court Orders, an individual's acceptance of the property referenced herein shall constitute a waiver of any and all claims against Miami-Dade County and the Receiver with respect to the personal property, including but not limited to, any claims or damages relating to toxins or other hazardous materials, if any, remaining on the personal property. Neither the Receiver nor the County shall be held responsible for the turnover of personal property inadvertently to the wrong person so long as the Receiver follows the procedures set forth herein and in the Court's prior applicable Order(s) relating to the turnover of personal property.

2. If after considering the objection(s) and any additional evidence, and conducting any follow-up interviews or investigation he deems necessary, the Receiver may decide to revise the determination in this Report and Recommendation. If that occurs, the Receiver will send all Claimants the Revised Report and Recommendation by email. Any Claimant(s) objecting to the Revised Report and Recommendation will have two weeks from the date of the Receiver's email to notify the Receiver in writing by email of their objection(s) to the Revised Report and Recommendation. If that occurs, the Receiver will then file the Revised Report and Recommendation (and any related documents) with the Court, and the objecting Claimant(s) will have an opportunity to file a written response with the Court through a process the Receiver will explain at that time. If, however, there are no further objections, the Revised Report and Recommendation will become final without any further action.

For any Report and Recommendations filed with the Court, the Court may adopt the Receiver's Report and Recommendation or conduct further hearings if it deems it necessary.

Date: , 2024

Respectfully submitted,

/s/ SAMPLE

Michael I. Goldberg, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on , 2024, a copy of the foregoing was emailed to Claimants listed above to their email address of record.

SAMPLE

Michael I. Goldberg, Esq.