

**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.

**RECEIVER'S MOTION TO CONFIRM THAT DISTRIBUTION
CAN BE MADE DIRECTLY TO VICTIM WHO HAS TURNED EIGHTEEN
SUBSEQUENT TO SETTLEMENT**

Receiver, Michael I. Goldberg (the "Receiver"), the court-appointed receiver of Champlain Towers South, pursuant to Rule 4 of the Complex Business Litigation Rules, files this Motion to Confirm that Distribution Can be Made Directly to Victim Who Has Turned Eighteen Subsequent to Settlement (the "Motion"), and states as follows:.

1. This case arises out of the tragic collapse of the Champlain Towers South Condominium on June 24, 2021.

2. Throughout late July and August, 2022, the Honorable Michael A. Hanzman, sitting in his capacity as Claims Administrator in these proceedings ("Claims Administrator"), undertook the arduous and extremely emotional task of determining the damages due to be distributed to the victims of this horrible tragedy out of the accumulated settlement fund.

3. In August, 2022, the Claims Administrator distributed written "Awards," setting forth the amount to be paid from the Settlement Fund (upon its establishment) to each eligible claimant.

4. One such award was made to Jonah Handler ("Jonah"), a minor child at the time of the award. To date, the Receiver has made two distributions. The first distribution made on behalf of Jonah was made to a trust created by his guardian as directed by Judge Hanzman. The second

distribution has not yet been made to Jonah. Jonah's guardian and Jonah have requested that the second distribution and all future distributions be made directly to Jonah now that he is eighteen years old.

5. In an abundance of caution, the Receiver seeks authority to make the second distribution and any future distributions directly to Jonah.

WHEREFORE, the Receiver respectfully requests the Court to enter an order authorizing the Receiver to make the second distribution and any future distributions directly to Jonah Handler and granting such other relief as is just and proper.

Dated: March 5, 2024

Respectfully submitted,

/s/ Michael I. Goldberg
Michael I. Goldberg, Esq.
Florida Bar Number: 886602
AKERMAN LLP
201 E. Las Olas Boulevard, Suite 1800
Fort Lauderdale, Florida 33301-2999
Tel: (954) 463-2700
Fax: (954) 463-2224
Email: michael.goldberg@akerman.com
Secondary Email: charlene.cerda@akerman.com
Court-Appointed Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 5, 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
Michael I. Goldberg