

IN THE CIRCUIT COURT FOR THE 11th
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

ANA DANTON, individually and
for the use and benefit of other
property owners within Hammocks
Community Association Incorporated,

CASE NO. 2022-007798-CA-01

Plaintiff,

v.

HAMMOCKS COMMUNITY ASSOCIATION
INCORPORATED,

Defendant.

**RECEIVER’S: 1) FOURTH SUPPLEMENTAL REPORT
FOR THE PERIOD MAY 5, 2023 THROUGH JULY 17, 2023; AND,
2) SIXTH INTERIM APPLICATION FOR ORDER AUTHORIZING PAYMENT
OF FEES AND EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE
FUNDS PURSUANT TO THE APPOINTMENT ORDER**

The Honorable David M. Gersten (Retired), the court-appointed Receiver (the “Receiver”) in the above-captioned action, and pursuant to the Court’s November 21, 2022 Order Appointing Receiver by Stipulation of the Parties, as amended by the Court’s June 1, 2023 Order Granting Unopposed Motion for Modification of Schedule for Filing Receiver’s Status Reports, submits his Fourth Supplemental Report setting forth his activities and efforts to fulfill his court-appointed duties for the period from May 5, 2023 through July 17, 2023¹, together with his request for authorization for payment of interim professional fees and expenses for the period from May 16, 2023 through June 30, 2023.

¹ This Report supplements the Receiver’s January 4, 2023 Initial Report and Inventory, his February 22, 2023 Supplemental Report for the Period January 5, 2023 Through February 22, 2023, his March 27, 2023 Second Supplemental Report for the Period February 23, 2023 Through March 27, 2023, and his May 4, 2023 Third Supplemental Report for the Period March 28, 2023 Through May 4, 2023.

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I.
RECEIVER'S FOURTH SUPPLEMENTAL REPORT

A.
INTRODUCTION

With the March 30th election now a distant memory, the Association's Advisory Board is focused on taking the reins. Regular monthly Board meetings with robust homeowner attendance and participation, which were a threat to the prior Board, are now standard operating procedure at the Hammocks.

Guided, as needed, by the Receiver (and the homeowners), the Advisory Board has worked diligently to set its agenda and return the Hammocks to its former glory. The Receiver and his legal team also continue to work to recover the millions of dollars pilfered from the Association by the prior Board.

To that end, during the current reporting period the Receiver and his team (including the Advisory Board) have:

- established numerous committees to hone in on issues of particular importance to the Advisory Board and the homeowners and, in connection therewith, have retained outside professionals (a Certified Public Accountant and a licensed architect) to provide expert assistance to those committees;
- filed lawsuits against four (4) sets of former Association counsel (in which lawsuits the Receiver seeks approximately \$9 million in damages) and continued to assess additional lawsuits against other former Association counsel;
- continued to advocate to the Association's Crime policy insurer for the payment of the \$1 million limits under that policy;
- obtained an appellate reversal of a nearly \$300,000 judgment obtained by two (2) homeowners against the Association (and former Board member Marglli Gallego ("Gallego"));
- settled a pre-litigation wrongful death claim against the Association (involving a minor) for less than the applicable insurance policy limits (resulting in no payment by the Association to extinguish that perilous claim);

- reached an agreement with one of the Association’s prior attorneys to claw back tens of thousands of dollars paid by the prior Board;
- sold two (2) of the Association’s unneeded vehicles and reached an agreement to sell seven (7) others, resulting in total sales proceeds of approximately \$120,000.00, as well as thousands of dollars in savings resulting from saved carrying costs and reduced insurance expense;
- continued analyzing the Association’s business records to identify additional potentially recoverable monies (and sources thereof) as well as to retrieve data necessary to prepare the Association’s financial statements for 2019 through 2022 (a task that was ignored, in all likelihood purposefully, by the prior Board);
- consolidated the Association’s six (6) off-site storage spaces into one, resulting in over \$65,000.00 in yearly savings to the Association; and,
- completed the analysis of all liens and foreclosure actions filed by the Association since 2015 for any self-dealing.

With each passing day, the transition from the Advisory Board to a traditional Board progresses. In the interim, the Receiver and his legal team continue to work to ensure that the Association’s leadership has, as soon as possible, the necessary resources (financial, operational and legal) in place so that this Court can confidently pass the Association baton back to the homeowners.

B.

**THE RECEIVER’S ACTIVITIES AND EFFORTS FOR THE PERIOD
MAY 5, 2023 THROUGH JULY 17, 2023 AND ACTION PLAN MOVING FORWARD**

1.

Regular Advisory Board Meetings March Forward and Momentum Builds

Since the Receiver’s May 4th Report, the Advisory Board has conducted three (3) monthly Board meetings. Unlike Board meetings under the prior regime, vigorous Homeowner participation (in-person and via Zoom) during these meetings has been encouraged, greatly appreciated, and accorded the extreme importance it deserves.

As a result of those meetings, the Advisory Board has established and staffed four (4) additional committees (in addition to continuing the work of the previously established Architectural Control Committee and Assessment Committee), to wit: 1) a Governing Documents Committee; 2) a Finance Committee; 3) a Neighborhood Advisory Committee; and, 4) a Fining Committee. Some homeowners have already chipped in to assist by volunteering to serve on those committees.

As part of the transition from a Receiver-led community to one led by the homeowners and their duly-elected representations, the Receiver delegated numerous matters to these committees, including: 1) determining the Association's policy and procedure for pursuing unpaid assessments (in particular, the delinquency thresholds that will result in formal legal action by the Association), which is of particular concern in light of the hundreds of thousands of dollars in assessments owing to the Association; and, 2) evaluating the cost of an off-duty police officer to patrol the Hammocks (to address complaints of suspected gang activity).

Further demonstrating the committee members' desire to "do the right thing," two (2) of those committees have requested outside expert assistance. Accordingly, the Receiver has authorized the retention of: 1) a Certified Public Accountant to consult with the Finance Committee (as well as the Advisory Board's Treasurer and co-Treasurer); and, 2) a licensed architect to consult with the Architectural Control Committee.

2.

Clawing Back Association Monies

a.

Claims to Recover Damages Caused by the Prior Board's Fraud

i.

Claims Against the Association's Insurers

As discussed in his prior Reports, the Receiver has submitted a Proof of Loss with the Association's Crime policy carrier to recover \$3,429,744.03 in payments made by the prior Board to vendors that have been identified by independent forensic accountants Kapila Mukamal LLP ("KM") as fraudulent, subject to the Crime policy's \$1 million policy limits.

For months (and as discussed in the prior two (2) Reports to this Court), the Receiver's counsel had been responding to multiple requests for information and supporting documents from an accountant hired by the insurer to investigate the claim. Having provided all of that information and those documents, the Receiver's counsel received correspondence from the Crime insurer asserting various potential claimed coverage defenses and advising that it was continuing its investigation under a full reservation of rights. In response, on June 9, 2023, the Receiver's counsel sent correspondence to the insurer: 1) refuting the potential claimed coverage defenses; 2) highlighting the excessive time taken by the insurer to purportedly investigate the claim; and, 3) demanding timely payment of the policy limits.

Since that correspondence, the Receiver's counsel has followed up with the insurer multiple times per week to demand timely payment of the policy limits; the insurer has not yet denied the claim, so litigation would be, at this time, premature. The Receiver's counsel will continue to diligently push the insurer for payment of the policy limits and, if necessary, file a lawsuit to compel such payment.

ii.

Claims Against the Association's Prior Attorneys and Their Insurers

Immediately following his prior Report, the Receiver filed lawsuits against two (2) sets of the Association's prior attorneys: 1) Alfaro & Fernandez, P.A., Elbert Radames Alfaro Beita, Esq. and Yudany Fernandez, Esq., Case No. 2023-0-16876-CA-01, which lawsuit was filed on May 12th and seeks in excess of \$3,000,000.00 in damages; and, 2) Rasco Klock Perez & Nieto, P.L., Hilton Napoleon, II, P.A., and Hilton Napoleon II, Case No. 2023-016776-CA-01², which lawsuit was filed on May 15th and seeks in excess of \$5,000,000.00 in damages. Having only recently been filed, these cases are still in the pleadings stage; each of the defendants therein filed motions to dismiss the Receiver's Complaint. The Receiver anticipates that once he advances these cases beyond the pleadings stage they will progress quickly.

As previously advised, the Receiver's investigation revealed payments of over \$870,000.00 of Association monies to Gallego's personal criminal attorneys; all of those attorneys refused the Receiver's demand for the return of those monies. Accordingly, the Receiver has thus far filed the following lawsuits against those attorneys: 1) on June 7th, a lawsuit against Hermida Law Firm, LLC, Quintero Broche, P.A., and Jose M. Quinon, P.A., Case No. 2023-017821-CA-01, seeking the return of approximately \$350,000.00 paid to those attorneys; and, 2) on June 23rd, a lawsuit against Jauregui Law, P.A. and Sabino Jauregui, Esq., Case No. 2023-018690-CA-01, seeking the return of in excess of \$475,000.00 paid to those attorneys. The Receiver is also currently readying a lawsuit against another one of Gallego's former criminal attorneys who was paid with Association monies.

² The Receiver filed a motion to transfer that case to this Court; however, that motion was denied. In all of the other lawsuits that he has filed, the Receiver has filed or will be filing a motion to transfer each of those lawsuits to this Court.

The Receiver's efforts to claw back monies from the Association's prior attorneys has already borne some fruit. Shortly following his prior Report, the Receiver resolved a fraudulent transfer claim against one of the Association's attorneys for \$50,000.00: the resolution of that claim did not include a release of potential malpractice claims against that attorney, which claims are still being assessed by the Receiver.

iii.

Claims Against the Association's Prior Board

Shortly prior to (and as discussed in) his last Report, the Receiver filed a breach of fiduciary duty lawsuit against four (4) of the Association's non-arrested Board members, Case No. 2023-015558-CA-01. A motion to dismiss was filed on behalf of each of those defendants, which motion was heard on July 13th and was denied. The Receiver will aggressively push this case forward to expedite a much needed recovery for the Association.

As also discussed in the Receiver's prior Report, and based upon the breaches of fiduciary duty alleged in that lawsuit, the Receiver made a demand upon the Association's Directors and Officers Liability ("D&O") policy insurer for that policy's \$2,000,000.00 policy limits. That demand will soon expire. The D&O insurer has not yet offered policy limits.

b.

The Sale of Unnecessary Vehicles

Of the vehicles owned by the Association not needed for its operations, shortly after his prior Report the Receiver sold two (2) of those vehicles for \$12,389.00. The Receiver has recently reached an agreement to sell seven (7) of the Association's other unneeded vehicles for a total of \$109,751.00; three (3) of those vehicles were financed by the Association and have outstanding balances of approximately \$55,000.00, so the proceeds from that sale will be used, in part, to satisfy those loans.

Five (5) of the Association's other unnecessary vehicles are currently being repaired and will promptly be sold upon the completion of those repairs.

Ten (10) of the Association's vehicles were never located by the Receiver; the Receiver filed theft reports for each of those vehicles and made demands on the insurer for the two (2) vehicles covered by the Association's insurance policy. The assigned insurance adjuster is investigating those claims, which remain pending.

As discussed in the Receiver's prior Report, one (1) of the Association's vehicles is encumbered by a mechanics lien claimed by Galceran Auto Electric LLC for repair work directed by the prior Board. The Receiver is currently investigating that lien to either resolve or dispute same.

3.

The Forensic Accountants Continue to Assist Recovery Efforts

During the current reporting period, KM continued its analysis of Association invoices in furtherance of identifying additional potentially fraudulent vendors (beyond the seventeen (17) potentially fraudulent vendors already identified).

KM also continued to assist the Receiver's counsel in compiling additional necessary information to prosecute the aforementioned breach of fiduciary duty lawsuit against the Association's former non-arrested directors. More particularly, KM prepared an analysis of the Association's approved budgets to identify the particular areas where the former board members allowed the Association to incur expenses for amounts in excess of the budgeted amounts. KM also investigated the bank records of certain board members and their related parties to trace funds from the Association and determine precisely how those funds were utilized.

Moreover, KM worked with the Receiver's counsel in compiling additional information requested by the Association's crime insurer, as discussed above.

a.
The Association's Bank Accounts

The balance of the Association's bank accounts as of July 13, 2023 totaled \$1,601,666.66, more particularly as follows: 1) \$1,578,160.03 in accounts at City National Bank³; 2) \$22,808.41 in checking accounts at Popular Bank⁴; and, 3) \$698.22 in accounts at Truist Bank.

As addressed in the Receiver's prior Reports, KM must reconstruct the Association's financial activity for the years 2019 through 2022 so that accurate financial statements for those years can be prepared (as they were not prepared under the prior regime). In that regard, KM has continued to reconstruct the activity in the approximate twenty (20) Association bank accounts that were active from 2019 through 2022⁵, including continuing to work to obtain missing records from financial institutions.

KM has also begun reconstructing the detailed homeowner deposits made from 2019 through 2022, potentially in excess of 100,000 transactions. A manual review of those transactions was estimated to cost in excess of \$200,000.00. To reduce the cost of this necessary analysis, KM will be utilizing highly sophisticated forensic accounting software ("Valid8") rather than a manual review, which software is generally accepted for audit purposes. Utilizing that software will cut the cost of KM's homeowner deposit review in half, at least.

³ The Receiver has closed the Association's account at CIT/First Citizens Bank, and the \$44,530.12 that was maintained in that account was transferred to the Association's account at City National Bank.

⁴ With regard to the Association's pre-receivership loan from Popular Bank (which had an outstanding balance of \$435,547.67 at the time the Receiver was appointed), during the current reporting period the Receiver has made additional \$44,353.59 monthly payments on that loan, bringing the current loan balance down to \$88,862.43.

⁵ KM's bank account reconstruction will also be used to identify other transfers outside of the ordinary course of business and, thus, additional potentially recoverable transfers.

4.
The Association's Business Operations

a.
FSR's Continued Operation of the Association, Under the Direction of the Receiver

During the period from May 4, 2023 through July 13, 2023, FirstService Residential ("FSR") collected \$1,329,454.94 in assessments from homeowners, together with \$2,400.00 in boat storage fees.

FSR also caused to be paid, under the direction of the Receiver, \$1,165,646.08 in Association expenses, including, but not limited to, for the payment of: 1) the Association's professionals, to wit: Turf, security vendor, FSR, Florida's Bright & Blue Pools & Beach Service, The Lake Doctors, Inc., and The Fitness Solution; 2) other vendors, such as pest control and carpentry vendors; 3) permitting fees/expenses; 4) waste collection; 5) insurance premiums; 6) utilities; and, 7) the services performed by the Receiver's office, the Receiver's counsel (Damian Valori Culmo, "Lead Counsel"), former Advisory Committee counsel The Morgan Law Group (now counsel for the Advisory Board, "Advisory Board Counsel") and SBK Legal, KM, and Mark Migdal & Hayden ("Outside Counsel") for the time period from February 16, 2023 through March 15, 2023 (pursuant to the Court's May 19, 2023 Order permitting the payment of those fees).⁶

During the current reporting period, and in addition to its regular day-to-day property management services, FSR has also (under the direction of the Receiver):

- implemented monthly (versus quarterly) assessment payments for those homeowners for which quarterly assessment payments presented a financial burden, as approved by the Court;

⁶ Those fees totaled \$308,159.13.

- consolidated the Association's off-site storage units, which totaled six (6) storage units at the time the Receiver was appointed, into one storage unit, resulting in annual savings to the Association of \$67,572.36;
- identified active liens filed by the prior Board that have been satisfied by the subject homeowner (so that the Receiver can file Releases of those liens, which the Receiver has already begun doing);
- streamlined its Hammocks Hotline response procedures to ensure prompt responses to homeowners' questions and concerns, including hiring additional on-site staff to quickly respond to homeowners' calls and emails;
- begun setting up a new neighborhood accounting system so that homeowners can share with FSR information relating to any disputes that they have with the accounting information inherited by FSR from the prior Board (to clear up any discrepancies);
- worked to rectify pre-receivership permit issues and code violations at two (2) of the Association's pools, including obtaining proposals to ensure that the necessary work is completed and the pools re-inspected and back in service as soon as possible; and,
- obtained proposals to repair fencing throughout the community, which the prior Board allowed to fall into disrepair.

5.
Lawsuits Involving the Association

a.
The Association's Active Lawsuits, Generally

The Receiver's counsel continues to work through the approximate fifty (50) pending lawsuits filed by or against the Association. Most of those lawsuits are foreclosure actions, which the Receiver is attempting to resolve with the subject homeowners to avoid litigation costs and bring much needed overdue assessments into the Association's coffers.

During the current reporting period, five (5) additional lawsuits have been filed against the Association: four (4) bank foreclosure lawsuits and one (1) personal injury lawsuit arising out of an injury claimed to have occurred in 2021. The personal injury action has been submitted to the Association's insurer.

b.
The Sarmina Lawsuit

One of the non-foreclosure cases pending against the Association is a lawsuit filed by one of the Association's former attorneys (Sarmina Cetraro Law Group, PA, "Sarmina"). Sarmina performed collections work for the Association from 2015 through 2017 and has not been implicated in any of the prior Board's fraud. In July 2021, Sarmina filed a lawsuit against the Association seeking \$23,437.60 in unpaid attorneys' fees plus interest (dating back to 2017). Prior to the Receiver's appointment, Sarmina obtained a summary judgment on the issue of liability, leaving only the issue of damages to be determined.

The Association was previously represented in that lawsuit by Alfaro & Fernandez, P.A., which filed on behalf of the Association an Answer and Affirmative Defenses asserting as an affirmative defense (in response to the interest claim) that Sarmina did not make any demand for payment on the invoices until 2021. The Receiver's investigation revealed that affirmative defense

was baseless, as email correspondence from 2017 and 2018 shows not only that Sarmina was making demands for payment but also that the Association (through the prior Board) agreed to pay those fees (only to reverse course months later).

As this Court is aware, as it was discussed during a May 31st hearing before the Court on Sarmina's motion for relief from this Court's stay, the mother of one of Sarmina's partners (Rosanna Cetraro) was on the Association's Board at the time that Sarmina was retained by the Association. Although Ms. Cetraro abstained from the Board's vote on whether to retain Sarmina, her presence on the Board (together with Gallego and arrested Board member Myriam Rodgers) raised conflict-of-interest and self-dealing concerns. However, such a conflict (if not properly disclosed) merely renders the subject contract voidable (not void), thereby rendering the retainer agreement in full force and effect until it was cancelled (which had not yet occurred). Accordingly, that conflict did not provide a basis for the Association to avoid payment of the principal owed or the interest incurred.

As a result, the Receiver recently reached an agreement to resolve Sarmina's claim, shaving off approximately \$17,000 from the monies due under the subject retainer agreement. That agreement is contingent upon approval by this Court and, thus, will be submitted for the Court's consideration.

c.

The Cepero Appeal:

A Recent Victory Saving the Association Hundreds of Thousands of Dollars

The Receiver is pleased to report that, on June 23, 2023, the appellate court (Judge Robert N. Scola, Jr. of the United States District Court for the Southern District of Florida) issued his Opinion and Order reversing the Bankruptcy Court's pre-receivership Orders and Final Judgment (in the amount of \$253,437.60) against the Association in the case styled *Hammocks Community*

Association, Inc., et al. v. Josue Cepero, et al., Case No. 22-cv-22686-RNS. A copy of that Opinion and Order is attached as **Exhibit 1**.

As a recap, the Bankruptcy Court found the Association liable to homeowners Josue Cepero and Leticia Cepero (the “Ceperos”) for alleged damages caused, for the most part, as a result of a May 2019 incident between the Ceperos and Gallego: the Ceperos allege that during that incident Gallego harassed them, including by blocking their vehicle. Judge Scola found that:

there is not clear and convincing evidence in the record for the Court to find that Gallego[’s] conduct occurred during the course of her duties as Hammocks’ president. Because the bankruptcy court did not determine whether Gallego was acting on behalf of Hammocks, and because the record lacks sufficient factual support for the Court to determine that she was on its review on appeal, the Court must reverse the portion of the Contempt Orders finding Hammocks to be responsible for Gallego’s conduct during the May 2019 Incident.

Judge Scola remanded the matter to the Bankruptcy Court for further proceedings consistent with his Opinion and Order. On June 26th, the Bankruptcy Court set a hearing for July 19th on Judge Scola’s Opinion and Order.

Notwithstanding that the alleged damages that they sustained from the aforementioned May 2019 incident have been reversed as to the Association and are back before the Bankruptcy Court, on May 5, 2023, the Ceperos had the gall to file a duplicative state court lawsuit against the Association (together with Gallego and two (2) former Hammocks security guards) seeking another “bite at the apple” on that issue in another forum (Case No. 2023-016302-CA-01, pending before Judge Antonio Arzola). On June 19th, the Association filed its Motion to Dismiss that lawsuit; that Motion is scheduled for hearing on August 17th.

In the interim, the Ceperos have filed a motion with this Court seeking relief from the Court’s stay (so that they can litigate that duplicitous lawsuit); that motion is scheduled for hearing on August 9th.

d.

The Receiver's Analysis of the Prior Board's Foreclosure Lawsuits – and Liens – Has Been Completed

The Receiver has completed his analysis of all foreclosure cases and liens filed by the Association since 2015, the year that Gallego became an officer of the Association, for any self-dealing by the prior Board and/or related individuals or entities.

The Receiver analyzed the records pertaining to over 550 liens and over 100 foreclosure lawsuits (excluding pending foreclosure lawsuits) filed by the Association during the subject time period for any suspicious property transfers to the prior Board, related individuals, other “insiders, and all Association employee since 2015. Based upon his extensive review, the Receiver did not identify any suspicious property transfers to any such individuals.

6.

An Additional Federal Investigation into the Old Board's Conduct is Underway

Recently, the Receiver was notified by the United States Attorney's Office for the Southern District of Florida that they are investigating whether the Association (through the prior Board) made misrepresentations in its Paycheck Protection Program applications. The Receiver is optimistic that investigation will not result in any fines or penalties being assessed against the “cleansed” Association.

C.

CONCLUSION

Although there are still matters (in particular, financial recovery efforts and cleaned up financials and required audits) that the Receiver needs to complete, with the new members of the Receiver's team (*i.e.*, the Advisory Board) now firmly entrenched, the transition to a post-receivership non-advisory Board is on the horizon.

II.
RECEIVER’S SIXTH INTERIM APPLICATION FOR ORDER AUTHORIZING
PAYMENT OF FEES AND EXPENSES AND FOR AUTHORIZATION TO
DISTRIBUTE FUNDS PURSUANT TO THE APPOINTMENT ORDER

To assist the Receiver in carrying out his duties, and as authorized by the Amended Appointment Order, the Receiver: 1) retained Lead Counsel to assist with legal matters, including preparation and filing of court documents, and operating the Association; 2) authorized Michael S. Kaufman, Esq. (“Advisory Committee Counsel”) to represent the Advisory Committee and, in that regard, work with the Receiver and assist with the operation of the Association under the supervision of the Receiver; 3) appointed Advisory Board Counsel to represent the Advisory Board and, in that regard, work with the Receiver and assist with the operation of the Association under the supervision of the Receiver; and, 4) retained Outside Counsel to represent the Association in certain pending bank foreclosure cases filed against the Association.

The fees incurred by the Receiver’s office, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, and Outside Counsel, as well as forensic accounts (KM), are reflected on the invoices attached hereto as **Composite Exhibit 2** and reflect the time entries and work performed by the Receiver and his professionals for the benefit of the Association during the Application Period (May 16, 2023 through June 30, 2023)⁷ as well as the Receiver’s reductions thereto, as applicable.

As reflected in Composite Exhibit 2, during the Application Period: 1) the Receiver’s office incurred fees in the amount of \$72,296.00, which the Receiver has reduced by five (5) percent

⁷ The fees and costs, as applicable, for each of KM and Outside Counsel that are the subject of the instant Application are for the period from May 1, 2023 through June 30, 2023; Outside Counsel and KM’s fees and costs for the period from May 1, 2023 through May 15, 2023 (i.e., during the prior Application Period) were not included in the Receiver’s fee application for the prior Application Period and, thus, are included in the instant Application. In addition, the fees for Advisory Committee Counsel that are the subject of the instant Application are for the period from March 16, 2023 through May 15, 2023; Advisory Committee Counsel’s fees during the prior Application Period were not included in the Receiver’s fee application for the prior Application Period and, thus, are included in the instant Application.

(5%) to \$68,681.20, and costs in the amount of \$36.45, for a total of \$68,717.65; 2) Lead Counsel has incurred fees in the amount of \$108,835.00, which Lead Counsel reduced by five (5) percent (5%) to \$103,393.25, and costs in the amount of \$4,164.11, for a total of \$107,557.36; 3) Advisory Committee Counsel incurred fees in the amount of \$9,800.00, which the Receiver has reduced to \$9,200.00; 4) Advisory Board Counsel incurred fees in the amount of \$29,765.00, which the Receiver has reduced by five (5) percent (5%) to \$28,276.75, and costs in the amount of \$268.69, for a total of \$28,545.44; 5) KM incurred fees in the amount of \$32,787.80, which KM reduced by seventeen (17) percent (17%)⁸ to \$28,216.02, and costs in the amount of \$25,333.25, for a total of \$53,549.27; and, 6) Outside Counsel incurred fees in the amount of \$13,800.00.

At this time, the Receiver is seeking approval and authorization for payment of all such fees (at the reduced amounts) and costs, such that payment at this time would total \$281,369.72.

CERTIFICATION

The Honorable David M. Gersten (Retired), Receiver, hereby certifies that:

- (a) I have read this application (the “Application”);
- (b) To the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate;
- (c) All fees contained in the Application are based on the rates listed in the exhibits hereto and such fees as reduced by the Receiver are reasonable, necessary and commensurate with the skill and experience required for the activity performed;
- (d) I have not included in the amount for which reimbursement is sought the authorization of the cost of any investment, equipment or capital outlay (except to the extent that any

⁸ KM’s discount relates to all staff rates except partners.

such amortization is included within the permitted allowable amounts set forth herein for bulk mailing, photocopies and facsimile transmission);

- (e) In seeking reimbursement for a service which I, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, Outside Counsel, and/or KM justifiably purchased or contracted for from a third party (including but not limited to copying, imaging, bulk mail, messenger service, overnight courier, or computerized research), I request reimbursement only for the amount billed to me, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, Outside Counsel, or KM, as applicable, by the third-party vendor and paid by me, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, Outside Counsel, and/or KM, as applicable, to such vendor. To the extent that such services were performed by me as Receiver, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, Outside Counsel, and/or KM, I certify that I, Lead Counsel, Advisory Committee Counsel, Advisory Board Counsel, Outside Counsel, and/or KM, as applicable, am/is not making a profit on such reimbursable service.

/s/ David M. Gersten
THE HONORABLE DAVID M. GERSTEN
(RETIRED)
COURT-APPOINTED RECEIVER

WHEREFORE, the Honorable David M. Gersten (Retired), as Court-appointed Receiver, respectfully requests that the Court enter an order: (1) approving and authorizing payment of fees and costs to Receiver's office of \$68,717.65, to Lead Counsel of \$107,557.36, to Advisory Committee Counsel of \$9,200.00, to Advisory Board Counsel of \$28,545.44, to KM of \$53,549.27, and to Outside Counsel of \$13,800.00, incurred during the Application Period (May

16, 2023 through June 30, 2023), except as otherwise specifically noted above; and (2) granting such further relief as the Court deems just and proper.

Respectfully submitted this 17th day of July, 2023.

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By: s/ Melanie E. Damian
Melanie E. Damian, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was served through the Florida Court's E-Filing system upon all Counsel of Record, this 17th day of July 2023.

/s/ Eric R. Thompson
Eric R. Thompson, Esq.

EXHIBIT 1

United States District Court
for the
Southern District of Florida

In re:)	
)	
Josue Cepero and Leticia Cepero, Debtors.)	Civil Action No. 22-22686-Civ- Scola
)	
Hammocks Community Association Inc., and Marglli Gallego, Appellants,)	
)	
v.)	Bankruptcy Case No. 17-20358- LMI
)	
Josue Cepero and Leticia Cepero, Appellees.)	

Opinion and Order

This matter is before the Court on Appellants Hammocks Community Association Inc. (“Hammocks”) and Marglli Gallego’s (collectively, the Appellants) Initial Brief (ECF No. 10) on their appeal of the bankruptcy court’s orders finding the Appellants in contempt and granting damages to the Appellees (and Debtors below), Josue and Leticia Cepero.¹ The Appellees have submitted their Answer Brief. (ECF No. 20.) Hammocks has filed a Reply Brief. (ECF No. 33.) The Ceperos have also filed a motion to strike Hammocks’ Reply Brief. (Mot. Strike, ECF No. 34.) Hammocks has responded. (Resp., ECF No. 35.) The Ceperos have not filed an optional reply, and the time to do so has passed. After considering the briefs, the record, the argument of counsel, and the applicable authority, and for the reasons set forth below, the Court **affirms in part** and **denies in part** the bankruptcy court’s Contempt Orders, **denies** the Ceperos’ motion to strike (**ECF No. 34**), and **remands** this matter for further proceedings consistent with the terms of this order.

¹ Collectively, the bankruptcy court orders addressing the contempt findings and damages that are the subject of appeal here are the following orders, as identified on the bankruptcy court’s docket: ECF No. 328 (“Order Finding Hammocks Community Association and Marglli Gallego in Contempt”), ECF No. 339 (“Order on Sanctions”), ECF No. 477 (“Order Granting in Part Motion to Reconsider”), ECF No. 480 (“Order on Damages”), and ECF No. 510 (“Order Granting in Part Motion to Alter or Amend Judgment for Rehearing, Relief from Judgment and/or Reconsideration as to ECF 480”). (Not. Appeal at 1-2, ECF No. 1.) The Court will refer collectively to the orders on appeal as the “Contempt Orders,” or will reference them individually by docket entry number from the bankruptcy court case (as “Bk. ECF No.”), as appropriate.

1. Background

This matter arose from Appellees Josue and Leticia Cepero's Chapter 13 bankruptcy proceedings. Hammocks, as the homeowner's association for the Ceperos' residence, is a creditor in the underlying bankruptcy. Gallego was, at the time, Hammocks' president. (Bk. ECF No. 389, R. at 412.) She and the Ceperos had also maintained a personal relationship prior to the bankruptcy proceeding. (*Id.*) Needless to say, that personal relationship soured. Prior to filing for bankruptcy, the Ceperos began publicly alleging that Gallego was abusing the authority of her position as Hammocks' president to commit fraud and enrich herself, at the expense of Hammocks' residents. (R. at 260-64, 277-82.)

While the Court need not recount every detail here, these accusations resulted in deteriorating personal relationships, to the extent that the bankruptcy court felt it necessary to issue orders directing Gallego, and Hammocks, to cease and to avoid contact and communications with the Ceperos (and vice-versa; referred to as the "No-Contact Order"). (Bk. ECF No. 189, R. at 2-3.) Nevertheless, Gallego and the Ceperos became involved in an "altercation" on May 15, 2019 (the "May 2019 Incident"). (R. at 412-13.) The bankruptcy court held an evidentiary hearing, where it heard from witnesses to the altercation—including a responding police officer, a security guard, another witness, and Mr. Cepero, as well as Gallego herself—and reviewed documentary evidence, including video recordings of the incident and an audio tape of Gallego's call to 911 at the beginning of the incident. (R. at 412-18.)

Ultimately, the bankruptcy court found Gallego's testimony to be wholly incredible because the Court observed that she had lied about when she first called 911, who had blocked whose car, and the events leading up to the incident. (R. at 417-18.) The bankruptcy court observed that physical evidence, including the 911 call recording and the video footage of the incident, contradicted Gallego's statements. (*Id.*) Accordingly, the bankruptcy court disregarded her testimony in its entirety. (*Id.*)

Based on the testimony of Mr. Cepero and the other witnesses, as well as the physical evidence, the bankruptcy court found that Gallego initiated the altercation by pulling in front of and blocking the Ceperos' car in the spot where it was parked. (*Id.*) The bankruptcy court observed that Gallego then "got out of [her] car and approached the Ceperos' car while talking on the phone." (R. at 416.) The Ceperos remained in their car for the duration, and the altercation ended after the police responded and began to question those involved. (R. at 416-18.) Finally, the bankruptcy court observed that Gallego was driving a Hammocks vehicle at the time. (R. at 418.) Based on these

factual findings, the bankruptcy court determined that both Gallego and Hammocks had violated the No-Contact Order. (*Id.*)

After the May 2019 incident, and while the bankruptcy proceedings remained ongoing, Gallego and Hammocks filed suit in Florida state court against Leticia Cepero for defamation, among other acts. (R. at 418-19.) The lawsuit—filed in November of 2020—alleged that Mrs. Cepero had made “false and defamatory statements over the last four years (at a minimum) about Ms. Gallego,” thereby harming Gallego and Hammocks. (*Id.*) Upon being informed of the Ceperos’ ongoing bankruptcy, Gallego’s and the Hammocks’ counsel immediately dismissed the suit. (*Id.*) Based on the allegations in the “November 2020 Lawsuit,” the bankruptcy court found that Gallego and Hammocks had violated the automatic stay, but not the No-Contact Order. (R. at 419-20.)

Based on the May 2019 Incident (as a violation of the No-Contact Order) and the November 2020 Lawsuit (as a violation of the automatic stay), the bankruptcy court granted the Ceperos’ request for damages. (R. at 421-22.) The bankruptcy court considered the question of damages separately, and it ultimately awarded the Ceperos their attorneys’ fees, damages for emotional distress, and punitive damages. (Bk. ECF Nos. 339, 480, 510, R at. 423-34, 709-21, 745-50.) The bankruptcy court awarded the Ceperos a total of \$126,718.80 in actual damages and another \$126,718.80 in punitive damages, for a total award of \$253,437.60. (R. at 750.) The bankruptcy court imposed these damages jointly and severally against both Gallego and Hammocks. (*Id.*)

Gallego and Hammocks filed this appeal in August of 2022, seeking to overturn the bankruptcy court’s findings of contempt and imposition of monetary sanctions. (Not. Appeal at 1-2.) They initially raised five arguments on appeal. (Init. Brief at 21-22.) First, they argue that the bankruptcy court “erred in finding that the terminology in the [No-Contact] Order . . . is clear, definite, and unambiguous.” (*Id.* at 21.) Second, they argue that the bankruptcy court’s findings of contempt were not supported by clear and convincing evidence. (*Id.* at 21-22.) Third, they argue that the bankruptcy court “improperly held Hammocks in contempt” for Gallego’s role in the May 2019 Incident. (*Id.* at 22.) Fourth, they assert that the bankruptcy court abused its discretion in finding that the November 2020 Lawsuit violated the automatic stay. (*Id.*) Fifth, and finally, they argue that the bankruptcy court erred in holding Hammocks jointly and severally liable for punitive damages, both by applying the wrong standard and applying the standard it did use incorrectly. (*Id.* at 22-23.)

The Ceperos responded in opposition to each point, arguing that the No-Contact Order was clear, the bankruptcy court’s determinations should be not overturned as they are not clearly erroneous, and that the bankruptcy court

applied the right standard, correctly, to find Hammocks jointly and severally liable for punitive damages. (Ans. Brief at 12-13.) The Ceperos also argue that Hammocks waived its argument relating to the imposition of joint and several liability for punitive damages below. (*Id.*)

Only Hammocks replied, however, and after an extended stay of this matter: Gallego was arrested in November of 2022 following complaints by many homeowners that she defrauded Hammocks and its residents “of millions of dollars over a period of approximately seven (7) years” as president. (Reply Brief at 2.) Hammocks therefore had a receiver appointed to take over its operations. (*Id.*) The receiver fired prior counsel (who had represented both Gallego and Hammocks) and, after the resolution of additional matters in the bankruptcy court below, replied to the Ceperos’ Answer Brief alone (Gallego has not replied). (*Id.*) Hammocks now argues that it cannot be held liable for Gallego’s actions because her misconduct was not committed during the scope of her employment as Hammocks’ president. (*Id.* at 12-21.)

The Ceperos responded with a motion to strike, arguing that Hammocks raises issues not argued below and not raised in the Appellants’ Initial Brief. (Mot. Strike at 1-3.) Hammocks, of course, asserts in response that no new arguments have been raised—even if Hammocks’ counsel now puts a clearer argument forward about why Hammocks cannot be jointly and severally liable for the Ceperos’ damages, that argument was made repeatedly below and at length in the Initial Brief. (Resp. at 2-4.)

2. Standard of Review

The Court reviews ‘the bankruptcy court’s findings of fact for clear error and the court’s conclusions of law and mixed questions of law and fact *de novo*.’ *In re McLean*, 794 F.3d 1313, 1318 (11th Cir. 2015). “A finding of civil contempt must be based on ‘clear and convincing evidence’ that a court order was violated.” *Jove Eng’g, Inc. v. I.R.S.*, 92 F.3d 1539, 1545 (11th Cir. 1996). Decisions regarding the imposition of sanctions through civil contempt orders are reviewed for an abuse of discretion. *Id.* “Applying this standard, a reviewing court ‘must affirm unless [it] find[s] that the lower court has made a clear error of judgment, or has applied the wrong standard.’” *In re Siskind*, 2018 WL 634547, at *1 (S.D. Fla. Jan. 31, 2018) (Rosenberg, J.) (quoting *In re Walker*, 532 F.3d at 1308.) “The reviewing court may affirm on any legal ground supported by the record.” *Id.*

3. Analysis

The Court, in summary, finds that the bankruptcy court did not abuse its discretion in finding that Gallego violated the No-Contact Order during the May 2019 Incident. The Court further finds that the bankruptcy court did not abuse its discretion in finding that both Gallego and Hammocks violated the automatic stay by filing the November 2020 lawsuit. Therefore, the Court affirms those parts of the Contempt Orders.

But the Court finds that the bankruptcy court did not apply the correct legal standard to determine whether Hammocks should, in fact, be liable for Gallego's conduct during the May 2019 Incident and that any such finding does not have factual support in the record. Accordingly, the Court reverses this part of the bankruptcy court's findings (holding Hammocks jointly and severally liable for damages relating to the May 2019 Incident) and remands this matter for the purpose of determining whether Gallego was acting within the scope of her duties as president of Hammocks during the May 2019 Incident.

A. The Bankruptcy Court's Factual Findings Are Not Clearly Erroneous

First, the Court observes that none of the bankruptcy court's factual findings are clearly erroneous. *In re McLean*, 794 F.3d at 1318. The bankruptcy court observed the testimony of the witnesses during its evidentiary hearing on the Ceperos' contempt motion. (R. at 417-18.) It made the decision to disregard Gallego's testimony based both upon its own observation of her testimony and on the multiple conflicts it observed between her testimony and the physical evidence presented at the hearing. (*Id.*) The Court will not second-guess the bankruptcy court's factual findings where they are based on observation of witness testimony and conflict between that testimony and physical evidence in the record. *See, e.g., In re Brown*, 742 F.3d 1309, 1317-18 (11th Cir. 2014) (holding bankruptcy court's factual findings to not be clearly erroneous where those findings had support in the record).

B. The No-Contact Order is Sufficiently Clear

Second, the Court makes the simple observation that the No-Contact Order's prohibition of "contact" and "communication" between Gallego and Hammocks, on the one side, and the Ceperos, on the other, is sufficiently clear, definite, and unambiguous. As the Ceperos observe, the bankruptcy court "made it abundantly clear that both [Hammocks] and Ms. Gallego were forbidden from engaging in any contact or interaction with the Debtors." (Ans

Brief at 15. Whether the happenings of May 15, 2019, are termed an “altercation” (the Ceperos’ choice of words) or an “incident” (Gallego’s), they are precisely the sort of interaction that the No-Contact Order is worded to prevent. (R. at 2-3.) The No-Contact Order prohibits the following conduct by Hammocks and Gallego: “**any** further contact,” “communication from **any** representative” of Hammocks or from its “President, Marglli Gallego.” (R. at 2 (emphasis added).)

The Appellants’ linguistic parsing in their Initial Brief regarding the terms “contact” and “communication” is meritless. The No-Contact Order’s prohibitions are simple, clear, and straightforward. Gallego and Hammocks were barred from making contact with or communicating with the Ceperos during the bankruptcy. “Contact” is defined as “association, relationship, connection, [or] communication.” *Contact*, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/contact> (last accessed June 23, 2023). “Communication” is defined as “a process by which information is exchanged between individuals through a common system of symbols, signs, or behavior.” *Communication*, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/communication> (last accessed June 23, 2023). The No-Contact Orders are therefore clear and unambiguous. Gallego and Hammocks were barred from any interaction or exchange with the Ceperos that involved spoken, written, or behavioral exchanges between the parties.

C. The Bankruptcy Court Did Not Abuse Its Discretion by Finding that Gallego’s Conduct During the May 2019 Incident Violated the No-Contact Order

In light of the bankruptcy court’s factual findings and the clear terms of the No-Contact Order, the Court finds that the bankruptcy court did not abuse its discretion when it found Gallego to be in contempt for violating that order. Gallego’s intentional blocking of the Ceperos’ car during the May 2019 Incident was a form of “contact,” and even if Gallego did not verbally “communicate” with the Ceperos, her behavior certainly sufficed as “communication.” (R. at 412-18.) The bankruptcy court made no “clear error of judgment” in finding that Gallego violated the No-Contact Order. *See In re Siskind*, 2018 WL 634547, at *1. Gallego’s violation, as demonstrated by multiple witnesses and physical evidence, was supported by clear and convincing evidence. (R. at 412-18); *Jove Eng’g*, 92 F.3d at 1545. Accordingly, the Court must affirm the bankruptcy court’s finding of contempt against Gallego for her conduct during the May 2019 Incident.

D. The Bankruptcy Court Did Not Abuse Its Discretion by Finding that Both Gallego and Hammocks Violated the Automatic Stay in Filing the November 2020 Lawsuit

Next, the Court finds that the bankruptcy court correctly determined the Appellants' filing of the November 2020 Lawsuit to be a violation of the automatic stay. Accordingly, the Court affirms the bankruptcy court's Contempt Orders against both Gallego and Hammocks for violating the stay.

The Eleventh Circuit considers the bankruptcy code's automatic stay (11 U.S.C. § 362(a)) to be "essentially a court-ordered injunction, and any person or entity who violates the stay may be found in contempt of court." *Jove Eng'g*, 92 F.3d at 1546. While the review of the bankruptcy court's entry of contempt for violating the automatic stay is still done under an "abuse of discretion" standard, that standard is "less deferential" than typical. *Id.* The Court must be satisfied that the finding of contempt is based on clear and convincing evidence and that the bankruptcy court's decision was not clearly erroneous. *Id.* at 1545.

The bankruptcy court's decision was supported by clear and convincing evidence: the substance of Gallego's and Hammocks' pleadings against Leticia Cepero. Gallego and Hammocks based the November 2020 Lawsuit not just on post-petition conduct, but also on allegations that Mrs. Cepero had made "false and defamatory statements over the last four years (at a minimum) about Ms. Gallego," and that those statements harmed Gallego and Hammocks. (R. at 418-19.) Gallego and Hammocks repeated these allegations—of defamatory statements going back four years or more—in their counts for relief as well. (*Id.*) The four years prior to November 2020 include time in 2016 and 2017 prior to the Ceperos' bankruptcy petition. Whether the November 2020 lawsuit included post-petition allegations is therefore irrelevant; it **did** include allegations relating to pre-petition conduct, which the automatic stay prohibits. 11 U.S.C. § 362(a)(1).

Therefore, the bankruptcy court's decision was not clearly erroneous, and it was supported by incontrovertible, not just clear and convincing, evidence. The Court must affirm the finding of contempt against both Gallego and Hammocks relating to the November 2020 Lawsuit.

E. The Bankruptcy Court Did Not Apply the Correct Standard in Finding Hammocks Jointly and Severally Liable for Punitive Damages for Gallego's Conduct in the May 2019 Incident

The Court finds that the bankruptcy court's entry of contempt against Hammocks for Gallego's conduct during the May 2019 Incident is an abuse of

discretion, however. The bankruptcy court applied the wrong standard in determining that Hammocks was liable for punitive damages for Gallego's actions as its president during the May 2019 Incident.

First, the Court must briefly address the Appellees' motion to strike Hammocks' Reply Brief. The motion to strike is without merit: although Hammocks applies different legal reasoning in its Reply Brief than originally submitted in its Initial Brief, the point made remains the same, and was argued (perhaps unartfully) below. Hammocks asserts that the bankruptcy court improperly found it to be liable for Gallego's conduct because she was not performing her duties as president at the time of the May 2019 Incident. (Init. Brief at 42-43; Reply Brief at 12-19.) Therefore, the Court denies the motion to strike and considers Hammocks' reply brief in full.²

Florida law sets two different standards for an employer's liability for an employee's actions. The first, for all employees, is established by statute. Florida Statutes § 768.72(3) requires the following:

- (3) In the case of an employer, principal, corporation, or other legal entity, punitive damages may be imposed for the conduct of an employee or agent only if the conduct of the employee or agent meets the criteria specified in subsection (2) and:
- (a) The employer, principal, corporation, or other legal entity actively and knowingly participated in such conduct;
 - (b) The officers, directors, or managers of the employer, principal, corporation, or other legal entity knowingly condoned, ratified, or consented to such conduct; or
 - (c) The employer, principal, corporation, or other legal entity engaged in conduct that constituted gross negligence and that contributed to the loss, damages, or injury suffered by the claimant.

² The Court notes, however, that even if it had struck Hammocks' reply brief, it still would have found that the finding of contempt against Hammocks for the May 2019 Incident was not supported by clear and convincing evidence. Rather, the evidence against Hammocks is thin (at best). The only point supporting a finding that Gallego was performing her duties as president at the time of the incident was that she was driving a Hammocks vehicle. (R. at 418.) This alone would not suffice to hold Hammocks jointly and severally liable for her conduct, as the remainder of the evidence in the record says nothing about what Gallego was doing at the time. (R. at 412-18.) Gallego's own testimony supports a finding that she was not performing her duties for Hammocks but rather was using the vehicle to pick up her son from school; this testimony is not useful to support any finding, though, because the bankruptcy court disregarded her testimony in its entirety as untruthful. (*Id.*)

The second, for an employer's managing agent, is much different, and set by the Florida Supreme Court's case law. The Florida Supreme Court has confirmed that a corporation bears direct, rather than vicarious, liability for an officer or managing agent's misconduct. *Schropp v. Crown Eurocars, Inc.*, 654 So. 2d 1158, 1160-61 (Fla. 1995); *see also Bankers Mult. Line Ins. Co. v. Farish*, 464 So. 2d 530, 533 (Fla. 1985). As the Appellants themselves concede, the codification of an employer's vicarious liability for an employee's misconduct via Florida Statutes § 768.72(3) did **not** abrogate or otherwise alter the *Schropp* and *Bankers* rule that an employer is directly liable for an officer or managing agent's misconduct. (Init. Brief at 42 (citing *When Is a Manager a Managing Agent*, Christopher Johnson and Ted Craig, 75 Fla. Bar J. 62 (2001)).)

The bankruptcy court properly applied the *Schropp* standard, finding that Hammocks would be directly liable for Gallego's conduct based on her status as a managing agent (as president). (R. at 748-49.) But the bankruptcy court failed to make the final, necessary finding: it nowhere evaluates whether Gallego was acting in performance of her duties as Hammocks' president at the time of the May 2019 Incident. As Hammocks observes in its Reply Brief, there is an implicit understanding in *Schropp* and *Bankers* that the managing agent's conduct which gave cause for punitive damages must have occurred during the course of the managing agent's employment. 654 So. 2d at 1159-61 (addressing corporation's responsibility for punitive damages in the context of fraud committed by corporation's sales manager in the course of negotiating with a customer); 464 So. 2d at 533 (addressing corporation's responsibility for punitive damages in the context of president of the corporation's tortious interference with an employee's contract with the employee's attorneys).

This rule makes perfect sense, too—surely a corporation cannot be “on the hook” for its managing agent's conduct that is unrelated to the workplace. If a bank's president damages her neighbor's property in a personal dispute, the bank cannot be expected to be liable for those damages based on the president's employment. So too here: if Gallego was truly acting in a personal capacity at the time of the May 2019 Incident, then Hammocks cannot be expected to be liable for her conduct.

The only evidence that could possibly demonstrate that Gallego was acting in the course of her employment during the May 2019 Incident is the fact that she was driving a Hammocks vehicle. (R. at 418.) Because the bankruptcy court disregarded Gallego's testimony entirely due to its

perceptions of her untruthfulness, the Court will not consider it here.³ Accordingly, there is not clear and convincing evidence in the record for the Court to find that Gallego conduct occurred during the course of her duties as Hammocks' president. Because the bankruptcy court did not determine whether Gallego was acting on behalf of Hammocks, and because the record lacks sufficient factual support for the Court to determine that she was on its review on appeal, the Court must reverse the portion of the Contempt Orders finding Hammocks to be responsible for Gallego's conduct during the May 2019 Incident. Hammocks cannot be liable for punitive damages for Gallego's conduct on May 15, 2019, based on the record presented here.

4. Conclusion

For the reasons stated above, the Court **affirms in part** and **reverses in part** the bankruptcy court's contempt orders and **remands** this matter to the bankruptcy court for further proceedings consistent with this order. The Court also **denies** the Ceperos' motion to strike the Association's reply. (**ECF No. 34.**) The hearing set for May 29, 2023, at 8:30 A.M. is **canceled**.

Done and ordered at Miami, Florida, on June 23, 2023.



Robert N. Scola, Jr.
United States District Judge

³ As the Court observed above, if it had considered Gallego's testimony, that testimony would have supported a finding that Gallego was not acting in the course of her duties as Hammocks' president at the time of the May 2019 Incident.

**COMPOSITE
EXHIBIT 2**

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June 29, 2023
ID: GERSP 1292668
Invoice No. 21354173
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH June 15, 2023

Fees For Professional Services:	\$51,191.00
LESS DISCOUNT	-2,559.55
Total for Professional Services:	\$48,631.45
Expenses and Advances:	\$21.06
Current Bill:	\$48,652.51

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/16/23	Review and respond to Melanie Damian email re: FSR conversation .1; review and respond to bright pools statement re: pool work .1; review and respond to email from Eric Thompson re: open cases .1; and review and respond to Eric Thompson re: new foreclosure case .1	DMG2	0.40
05/16/23	Research on Hammocks Community Association employees, their property, civil liens, corporation links, civil actions, and criminal actions.	KAG1	1.60
05/16/23	Attend (remotely, via Zoom) hearing on Plaintiff's Motion to Strike Defendants' Amended Affirmative Defenses (in the case styled Deutsche Bank Nat'l Trust Co. v. Soraya Jimenez, et al., Case No. 2020-004756-CA-01)	ERT	0.70
05/16/23	Email correspondence with outside counsel (Maia Aron, Esq.) regarding her memorandum discussing strategy going forward to as to the pending cases against the Association filed by Toorak Capital Funding, LLC Case Nos. 2020-22065, 2020-25327, 2020-25383)	ERT	0.40
05/16/23	Analyze charts of status of pending cases filed by/against the Hammocks (drafted by A. Ruff) in furtherance of evaluating strategy in each such case going forward	ERT	0.30
05/16/23	Email correspondence with R. Stone regarding strategy in pending cases filed by/against the Hammocks in light of my review of charts drafted by A. Ruff regarding same	ERT	0.30
05/17/23	Review and respond to Russell Landy email re: witness .1; review and respond to Melanie Damian email re: FSR .1; review and respond to Melanie Damian email re: conference .1; review and respond to Shelly Jacoby re: payment .1; confined with Eric Thompson re: open cases .2; and review and respond to email from Eric Thompson re: FSR .1	DMG2	0.70
05/17/23	Research on Hammocks Community Association employees, their property, civil liens, corporation links, civil actions, and criminal actions.	KAG1	2.60
05/17/23	Draft Motion to Stay and, or in the Alternative, to Extend Case Management Deadlines (in the case styled Hammocks Community Assoc., Inc. v. Beach Club Kendall, LLC, Case No. 2022-017948-CA-01), 4 pages	ERT	0.80

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/17/23	Email correspondence with outside counsel (Maia Aron, Esq.) regarding her memorandum discussing strategy going forward to as to the pending cases against the Association filed by Toorak Capital Funding, LLC Case Nos. 2020-22065, 2020-25327, 2020-25383)	ERT	0.30
05/18/23	Review Morgan Law Group billing .3; review and respond to email re: FSR issues .1; review and respond to email between Jesmany Jomarron, Russell Landy and Eric Thompson re: FSR issues .1; review and respond to Melanie Damian email re: Steven Katz billing .1; review and respond to Melanie Damian email re: receiver's report .1; review and respond to Eric Thompson email re: conference .1; and status conference with Melanie Damian and Eric Thompson re: open case issues and insurance issues .4	DMG2	1.20
05/18/23	Research on Hammocks Community Association employees, their property, civil liens, corporation links, civil actions, and criminal actions.	KAG1	2.60
05/18/23	Telephone conference with independent counsel (Russell Landy, Esq.) regarding Notice for Application of Tax Deed for 5801 NW 151st Street, Suite 305 recently received by Mr. Landy's office, including any actions to be taken regarding same	ERT	0.10
05/18/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss strategy with regard to pending cases filed by/against the Hammocks and insurance issues	ERT	0.40
05/19/23	Strategic conference with Russell Landy and Eric Thompson re: fact bases for use in complaint(s) and clawbacks and lis pendens issue .7; conference with Eric Thompson re: appellate issues and open cases .3; review and respond to Maia Aron email re: joinder and default issues .1; review and respond to Chicky Ardisson email re: Lakeview .1; review and respond to Maia Aron email re: Jesmany Jomarron. and joinder .1; review Santiago Villarreal and Hector Meneses email(s) re: ACC .1; review and respond to Eric Thompson email re: cases .1; review and respond to Melissa Vasquez email re: ticket report delay till Monday .1; and review and edit current draft of Cepero brief 1.9	DMG2	3.50
05/19/23	Research on Hammocks Community Association employees, their property, civil liens, corporation links, civil actions, and criminal actions.	KAG1	2.40
05/19/23	Telephone conference with independent counsel (Kenneth Murena, Esq.) regarding preparation of motion requesting that the Court permit quarterly (rather than monthly) reports from the Receiver (to conserve	ERT	0.10

<u>Date</u>	<u>Description</u> costs)	<u>Init</u>	<u>Hours</u>
05/19/23	Telephone conference with D. Gersten and independent counsel (Russell Landy, Esq.) to discuss the results of Mr. Landy's ongoing investigation as to misconduct by former Board members and the Association's former counsel	ERT	0.70
05/19/23	Telephone conference with D. Gersten to discuss strategy with regard to pending lawsuits filed by/against the Association	ERT	0.30
05/19/23	Revise/supplement Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS) in light of review of additional case law addressing the standards used in assessing punitive damages against a company/employer under theories of direct liability and vicarious liability, (including as affected by the amendment of Fla. Stat. 768.72 to include 768.72(3))	ERT	0.70
05/19/23	Analyze Florida state and federal case law addressing standards used in assessing punitive damages against a company/employer under theories of direct liability and vicarious liability, including as affected by the amendment of Fla. Stat. 768.72 to include 768.72(3) (in furtherance of revising/supplementing Reply Brief in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS), including, but not limited to, analyze and shepardize the following: 1) Ranger Construction Industries, Inc. v. Allied World Nat'l Assurance Co. (S.D. Fla. 2019), 8 pages; 2) Partington v. Metallic Engineering Co., Inc. (Fla. 4th DCA 2001), 3 pages; 3) Allan v. Falcon Transport Co. (M.D. Fla. 2018), 5 pages; and 4) HRB Tax Group, Inc. v. Fla. Investigation Bureau, Inc. (Fla. 4th DCA 2023), 3 pages (pre-approved by Jessica Shirinian (Markel))	ERT	0.80
05/20/23	Conference with Leo Lagomasino and Eric Thompson re: cases to be handled .5; review and forward Bright Pools communication .1; continued review and editing of current draft of Cepero brief 1.8; and review and respond to Melanie Damian and Jesmany Jomarron email re: Beltran and response .1	DMG2	2.50
05/20/23	Telephone conference with D. Gersten and L. Lagomasino to discuss strategy with regard to pending cases filed by/against the Association	ERT	0.50
05/21/23	Review and approve billing .2; and review and forward billing from extra space storage .1	DMG2	0.30
05/21/23	Research on Hammocks Community Association employees, their	KAG1	0.90

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	property, civil liens, corporation links, civil actions, and criminal actions.		
05/22/23	Review latest draft of Cepero brief in advance of filing deadline .8; and review Melanie Damian email re: respond to Beltran inquiry .1	DMG2	0.90
05/22/23	Communication with lead partner to deliver completed Hammocks employee research and share status updates of two other research focuses.	KAG1	0.20
05/22/23	Draft and receive emails to and from Ms. Aron regarding upcoming hearings and status of stay	LML3	0.30
05/22/23	Email correspondence with independent counsel (Melanie Damian, Esq. and Kenneth Murena, Esq.) regarding and attaching draft Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., AppealCase No. 22-cv-22686-RNS), for their review and approval	ERT	0.10
05/22/23	Email correspondence with Maia Aron, Esq. regarding strategy going forward with regard to the insistence by Plaintiff's counsel (in the case styled MidFirst Bank v. Flores, Case No. 2022-003881-CA-01) to seek relief from stay from Judge Butchko in the receivership case	ERT	0.20
05/22/23	Analyze Court's on-line docket, and pertinent filings, in the case styled Shawn Michael Vazquez v. Hammocks Community Assoc. Inc., Case No. 2021-025535-CA-01, in preparation for 5/25/23 FWOP hearing (as noticed by the Court on 2/7/23)	ERT	0.20
05/22/23	Further revise Reply Brief in accordance with additional comments by D. Gersten (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	1.60
05/23/23	Review and respond to Ken Murena email re: settle case .1; review and respond to Jesmany Jomarron email re: FSR call center .2; review and respond to Melanie Damian email with edited brief attached and review edits for approval .3; review and forward bright pools communication .1; and review and respond to Ken Murena email re: filing of Cepero brief .1	DMG2	0.80
05/23/23	Initial review for identifying information and Bar discipline history of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022.	KAG1	0.90
05/23/23	Discussion with Ms. Aron re upcoming hearing re request to lift stay	LML3	0.40

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/23/23	(Guevara) - review requests for ledgers and draft answer	LML3	0.10
05/23/23	Revise, in accordance with comments by independent counsel (Melanie Damian, Esq. and Kenneth Murena, Esq.), Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	0.40
05/23/23	Draft the Association's Answer and Affirmative Defenses in the case styled Planet Home Lending, LL v. Anniee Milian Guevara, et al., Case No. 2023-015879-CA-01, 6 pages	ERT	0.90
05/23/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding additional information needed to finalize the Association's Answer and Affirmative Defenses in the case styled Planet Home Lending, LL v. Anniee Milian Guevara, et al., Case No. 2023-015879-CA-01, including analyze attached ledgers provided by Ms. Vazquez (10 pages)	ERT	0.20
05/23/23	Super-proof, further revise, and preparing for filing Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	1.10
05/24/23	Review and respond to Jesmany Jomarron email .1; and review and respond to Eric Thompson email .1	DMG2	0.20
05/25/23	Review and forward to Melissa Vasquez Bright Pools information .1; and review and respond to Russell Landy email re: motion .1	DMG2	0.20
05/25/23	Research of properties, county documents, corporations, civil cases, and criminal cases of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022, specifically attorneys within the Rosco Klock Perez & Nieto, P.A. firm.	KAG1	3.40
05/25/23	Telephone conference with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding status of retaining Certified Public Accountant to assist the Association's Treasurer and Finance Committee	ERT	0.10
05/25/23	Telephone conference with D. Gersten regarding strategy going forward as to potential post-opinion motions following today's PCA	ERT	0.10
05/26/23	Review and respond to Melanie Damian re: transfer motion .1; review and respond to Melanie Damian email re: stay order .1; review and respond to CPA email re: agreement to consult with Treasurer and	DMG2	1.50

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	finance committee .1; review draft of complaint against law firms sent by Russell Landy .5; review and forward Chicky Ardisson inquiry to Russell Landy and Eric Thompson to run down answer fro Chicky .1; review and respond to Eric Thompson edits to CPA contract .2; review and respond to Eric Thompson re: complaint against attorneys .1; review and respond to Chicky Ardisson emails and coordinate with Russel Landy re: ACC Lakeview approval .2; and review and forward extra space confirmation of moving out of space .1		
05/26/23	Research of properties, county documents, corporations, civil cases, and criminal cases of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022, specifically attorneys within the Rosco Klock Perez & Nieto, P.A. firm.	KAG1	2.60
05/26/23	Email correspondence with Maia Aron, Esq. regarding strategy going forward with regard to the request by Plaintiff's counsel (in the case styled MidFirst Bank v. Flores, Case No. 2022-003881-CA-01) for an Agreed Order providing that the subject case is no longer stayed	ERT	0.10
05/26/23	Analyze proposed engagement agreement and Terms and Conditions provided today by Certified Public Accountant Jacqueline Greenberg to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee, 12 pages	ERT	0.40
05/26/23	Email correspondence with D. Gersten regarding proposed revisions to proposed engagement agreement and Terms and Conditions provided today by Certified Public Accountant Jacqueline Greenberg (to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee)	ERT	0.30
05/26/23	Analyze and revise proposed Complaint against Jauregui Law, P.A., Hermida Law Firm, LLC, Quintero Broche, P.A., and Jose M. Quinon, P.A. (drafted by independent counsel (Russell Landy, Esq.)), 9 pages	ERT	0.30
05/26/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding status of his investigation of pertinent affirmative defenses raised by the Association in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05	ERT	0.10
05/26/23	Email correspondence with D. Gersten regarding strategy in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05, including with regard to investigation of pertinent affirmative defenses raised by the Association and potential resolution	ERT	0.20

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/27/23	Review and respond to Eric Thompson email re: Sarmina case and upcoming hearing .1; review redlined edits to draft complaint against attorneys .2; review and forward bright pools notification to Melissa Vasquez .1; review and respond to Eric Thompson email re: Sarmina court hearing .1; review and respond to Jesmany Jomarron email re: tech issues and upcoming board certification class .1; and review and approve agenda for certification course .1	DMG2	0.70
05/28/23	Review and respond to Jesmany Jomarron email re: certification .1	DMG2	0.10
05/29/23	Review and forward bright pools notifications to Melissa Vasquez .1	DMG2	0.10
05/30/23	Review and respond to Eric Thompson email re: hearing tomorrow .1; review and respond to Chicky Ardisson email re: authorize ACC matter .2; review and respond to Carlos Villalobos email re: committee and need for resources .1; review and respond to Eric Thompson and Jesmany Jomarron email re: CPA consultant contract .1; and strategic conference with Eric Thompson email re: Sarmina lawsuit .3	DMG2	0.80
05/30/23	Research of properties, county documents, corporations, civil cases, and criminal cases of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022, completing attorneys within the Rosco Klock Perez & Nieto, P.A. firm.	KAG1	3.40
05/30/23	Email correspondence with Architectural Control Committee member Chicky Ardisson regarding status of approval of Architectural Control Application for Lakeview at the Hammocks	ERT	0.10
05/30/23	Analyze transcript of 4/11/23 hearing on Motion for Relief, 95 pages, in furtherance of drafting Initial Brief in Appeal Case No. 23-cv-21612	ERT	1.90
05/30/23	Telephone conference with D. Gersten regarding strategy for tomorrow's hearing on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022 (with regard to underlying case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05)	ERT	0.30
05/30/23	Draft outline of points to be raised during tomorrow's hearing on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022 (with regard to underlying case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05), 1 page, in preparation for that hearing	ERT	0.70
05/30/23	Analyze on-line docket of case styled The Sarmina Cetraro Group, P.A.	ERT	0.10

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05 (in preparation for tomorrow's hearing in receivership case on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022)		
05/30/23	Analyze Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022, 3 pages, in preparation for tomorrow's hearing on same (with regard to underlying case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05)	ERT	0.10
05/30/23	Analyze outline drafted by R. Stone regarding points in response to Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022, 2 pages (with regard to underlying case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05), in preparation for tomorrow's hearing on said Motion	ERT	0.10
05/30/23	Email correspondence with R. Stone regarding pertinent underlying facts as to efforts to resolve the case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05), in preparation for tomorrow's hearing on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022	ERT	0.20
05/30/23	Email correspondence with Advisory Board counsel (Jesmany Jomarron, Esq.) regarding proposed revisions to proposed engagement agreement and Terms and Conditions provided today by Certified Public Accountant Jacqueline Greenberg (to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee)	ERT	0.20
05/30/23	Analyze noted by R. Stone of her conferences with Plaintiff and Plaintiff's counsel in an attempt to resolve the case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05), 2 pages, in preparation for tomorrow's hearing on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022	ERT	0.10
05/30/23	Email correspondence with Certified Public Accountant Jacqueline Greenberg regarding Ms. Greenberg's proposed engagement agreement and Terms and Conditions (to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee)	ERT	0.10

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/31/23	Review emails between Eric Thompson and Ken Murena re: Cepero case .1; and review settlement agreement .2	DMG2	0.30
05/31/23	Communication with Melissa Vazquez regarding the status of the first group of outstanding liens recorded by Hammocks Community Association, which she reviewed from the list provided.	KAG1	0.30
05/31/23	Communication with E. Thompson regarding communication with Melissa Vazquez and update of research on attorneys involved in Hammocks Community Association 2015-2022.	KAG1	0.20
05/31/23	Research of properties, county documents, corporations, civil cases, and criminal cases of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022.	KAG1	3.20
05/31/23	Meet with team to discuss triage strategy regarding foreclosure cases	LML3	0.70
05/31/23	Conduct initial review of pending matters including matters where discussions for agreements of payments are ongoing and prepare charts re same	LML3	0.80
05/31/23	[Hammocks v. Siu] - Analyze history of communications regarding resolution of suit and litigation history	LML3	0.30
05/31/23	[Hammocks - Navas] - review status of pleadings including whether bankruptcy stay or discharge were entered	LML3	0.30
05/31/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding information needed from Mr. Landy to evaluate strategy going forward in the case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05, in light of today's hearing on the Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022, in particular with regard to potential voidability of subject retainer agreement due to familial relationship between Plaintiff and a prior Board member	ERT	0.20
05/31/23	Analyze documents recently produced by the Association's prior counsel (Alfaro & Fernandez) to independent counsel (Damian Valori) regarding the styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05, in particular with regard to the Association's affirmative defenses that the subject invoices were not sent to the Association until 2021 (218 pages)	ERT	0.90
05/31/23	Meeting with L. Lagomasino to discuss strategy with regard to pending	ERT	0.70

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
05/31/23	cases filed by/against the Association Attend (remotely, via Zoom) hearing on Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022 (with regard to underlying case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05)	ERT	1.30
05/31/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding strategy going forward with regard to the case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05, in light of today's hearing on the Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022, including potential voidability of subject retainer agreement due to familial relationship between Plaintiff and a prior Board member	ERT	0.40
05/31/23	Analyze applicable provisions of Chapter 718 of the Florida Statutes to evaluate strategy going forward with regard to the case styled The Sarmina Cetraro Group, P.A. v. Hammocks Community Association Incorporated, Case No. 2021-021625-CC-05, in light of today's hearing on the Plaintiff's Motion for Relief from Receiver's Order Dated November 21, 2022, in particular the potential voidability of subject retainer agreement due to familial relationship between Plaintiff and a prior Board member	ERT	0.40
05/31/23	Analyze Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief, 8 pages, in furtherance of drafting Response thereto (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS)	ERT	0.40
05/31/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding strategy for response to Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS)	ERT	0.20
06/01/23	Review and respond to Ken Murena email re: insurance/settlement .1	DMG2	0.10
06/01/23	Research of properties, county documents, corporations, civil cases, and criminal cases of list of attorneys and firms involved in any way with the Hammocks Community Association from 2015-2022.	KAG1	3.20
06/01/23	Analyze proposed Unopposed Motion for Modification of Schedule for	ERT	0.10

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	Filing Receiver's Status Reports (prepared by independent counsel, Adriana Pavon, Esq.), 3 pages		
06/01/23	Email correspondence with independent counsel (Adriana Pavon, Esq.) regarding my comments to Ms. Pavon's draft Unopposed Motion for Modification of Schedule for Filing Receiver's Status Reports	ERT	0.10
06/01/23	Analyze proposed General Release and Hold Harmless/Confidentiality Agreement drafted by independent counsel (Kenneth Murena, Esq.) with regard to the pre-litigation wrongful death claim asserted by claimants Gustavo Guzman and Natalie Ray (as Personal Representatives of the Estate of Angelo Guzman), 3 pages	ERT	0.30
06/01/23	Revise proposed engagement agreement and Terms and Conditions provided today by Certified Public Accountant Jacqueline Greenberg to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee	ERT	0.60
06/01/23	Telephone conference with Certified Public Accountant Jacqueline Greenberg regarding our revisions to Ms. Greenberg's proposed engagement agreement and Terms and Conditions (to finalize retention of Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee)	ERT	0.40
06/02/23	Review Carlos Villalobos, Don Kearns and Pete Cabrera email(s) re: certification .1; review and respond to Ken Murena email re: settlement .1	DMG2	0.20
06/02/23	Analyze Herring v. Secretary, Dep't of Corrections (11th Cir. 2005), cited in Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS), in furtherance of drafting Response thereto, 16 pages	ERT	0.20
06/02/23	Analyze the following cases relied upon, in pertinent part, by Herring v. Secretary, Dep't of Corrections (11th Cir. 2005), a case cited in Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS), in furtherance of drafting Response thereto: 1) U.S. v. Martinez (11th Cir. 1996), 7 pages; 2) U.S. v. Dicter (11th Cir. 1999), 10 pages; 3) U.S. v. Whitesell (11th Cir. 2002), 6 pages; and 4) U.S. v. Coy (11th Cir. 1994), 10 pages	ERT	0.40

Date	Description	Init	Hours
06/02/23	Begin to draft Response to Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS) (draft the following section: 1) Section I-Introduction, pg. 2; begin to draft the following section: 1) Section II-Argument, pp. 2-8)	ERT	1.80
06/03/23	Review and approve funding requests	DMG2	0.20
06/04/23	Review and respond to Ken Murena email re: settlement	DMG2	0.10
06/05/23	Review and respond to Melanie Damian re: pending issues .1; review and respond to Karen Wright re: ACC committee .1; review and respond to Corey Tickner re: authority re: board, FSR and direction .2; review and forward Miami-Dade notice of violation.1; review and respond to email from Sunflower Homeowners Association .1	DMG2	0.60
06/05/23	Completed research of attorneys hired by Hammocks Community Association from 2015-2022, reviewed and edited list, emailed to E. Thompson for possible assistance in receivership litigation.	KAG1	1.50
06/05/23	Received and responded to communication from Melissa Vazquez regarding satisfied claims of lien filed by Hammocks Community Association.	KAG1	0.30
06/05/23	Reviewed records and drafted form satisfaction of lien of Hammocks Community Association lien recorded against 16143 SW 106 Ter, as requested by M. Vazquez. Sent draft to E. Thompson.	KAG1	0.90
06/05/23	Telephone conference with Certified Public Accountant Jacqueline Greenberg regarding finalization of engagement agreement and Terms and Conditions for Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee	ERT	0.30
06/05/23	Finish drafting Response to Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal, Case No. 22-cv-22686-RNS) (finish drafting the following section: 1) Section II-Argument, pp. 2-8)	ERT	3.60
06/06/23	Review and respond to Russell Landy email re: violation notice .1; review and respond to Jesmany Jomarron re: Sunflower Homeowners correspondence .1; review and respond to Jesmany Jomarron email re: Sunflower Homeowners .1; review and respond to Russell Landy email	DMG2	0.70

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	re: violation notice .1; review and respond to Jesmany Jomarron re: fence issue .1; review and respond to Jesmany Jomarron email re: Riversides Villas .1; and review and approve Avid payment requests .1		
06/06/23	Email correspondence with outside counsel (Maia Aron, Esq.) regarding strategy/next steps with regard to Certificate of Disbursement recently received pertaining to the case styled The Bank of New York Mellon v. Biscayne Beach Club Condominium Association, Inc., Case No. 2019-023141-CA-01	ERT	0.20
06/06/23	Email correspondence with Certified Public Accountant Jacqueline Greenberg regarding finalization of engagement agreement and Terms and Conditions for Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee	ERT	0.10
06/06/23	Begin to draft outline of points to be addressed in Initial Brief in Appeal Case No. 23-cv-21612, in furtherance of drafting said Brief, 5 pages	ERT	1.20
06/07/23	Legal meeting with Eric Thompson and Jesmany Jomarron re: setting agenda items and discussion thereof 1.5; review and edit response to Cepero motion .3	DMG2	1.80
06/07/23	Email correspondence with Certified Public Accountant Jacqueline Greenberg regarding finalization of engagement agreement and Terms and Conditions for Ms. Greenberg to serve as a consultant to assist the Association's Treasurer and Finance Committee	ERT	0.20
06/07/23	Analyze Florida federal case law addressing the appellate standard of review on orders denying motions for relief under Fed. R. Civ. P. 60 (in furtherance of drafting Initial Brief in Appeal Case No. 23-cv-21612), including analyze the following cases: 1) Aldana v. Del Monte Fresh Produce N.A., Inc. (11th Cir. 2014), 9 pages; 2) Cano v. Baker (11th Cir. 2006), 6 pages; and 3) Gonzalez v. Mortgage Electronic Registration Systems, Inc. (11th Cir. 2014), 5 pages	ERT	0.30
06/07/23	Finish drafting outline of points to be addressed in Initial Brief in Appeal Case No. 23-cv-21612, in furtherance of drafting said Brief, 5 pages	ERT	1.10
06/07/23	Begin to draft Initial Brief in Appeal Case No. 23-cv-21612 (draft the following sections: 1) Section I-Statement of Jurisdiction, pg. 1; and 2) Section II-Issues Presented, pg. 2; begin to draft the following section: 1) Section III-Statement of the Case, currently pp. 3-21)	ERT	1.40

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/07/23	Attend (remotely, via Zoom) legal meeting with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss setting of agenda for 6/13/23 Board meeting	ERT	1.50
06/08/23	Review and edit current draft of response to motion .3; review minutes of advisory board for finality .3; review and pay bills via Avid .2	DMG2	0.80
06/08/23	Received and responded to communication by M. Vazquez regarding a satisfaction of lien for 11570 SW 148 Ct. within Hammocks Community Association.	KAG1	0.20
06/08/23	Revise, in accordance with comments by D. Gersten, Response to Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief	ERT	0.30
06/08/23	Email correspondence with counsel handling certain of the bank foreclosure actions pending against the Association (Maia Aron, Esq.) regarding strategy for attempted resolution of those cases (as they pertain to the amounts owed by the homeowner to the Hammocks)	ERT	0.10
06/08/23	Telephone conference with Certified Public Accountant Jacqueline Greenberg regarding steps going forward as to Ms. Greenberg serving as a consultant to assist the Association's Treasurer and Finance Committee	ERT	0.10
06/08/23	Continue drafting Initial Brief in Appeal Case No. 23-cv-21612 (continue drafting the following section: 1) Section III-Statement of the Case, currently pp. 3-21)	ERT	1.80
06/08/23	Analyze and revise draft Minutes of the 5/9/23 Board of Directors' Meeting (drafted by FirstService Residential), as requested by D. Gersten, 10 pages	ERT	0.80
06/09/23	Review Melanie Damian letter to insurance carrier .2; review and respond to forensic accounting firm's email re: audit issues .2; conference with Melanie Damian, Eric Thompson re: outstanding and upcoming issues re: court and insurance matters .9; review and respond to Russell Landy re: delinquency rate .1; review and respond to comprehensive email from Corey Tickner containing information on several issues (response deals with what is to be done on each issue) .5; email to/from Melanie Damian re: payment of bill and timing thereof .1; review and respond to email from legal team re: Cepero response .1; review and respond to Melanie Damian email with proposed response to insurance law firm .2; review and respond to Russell Landy email re: insurance issue .1; review and respond to Russell Landy email re:	DMG2	2.50

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	delinquencies .1		
06/09/23	Continue drafting Initial Brief in Appeal Case No. 23-cv-21612 (continue drafting the following section: 1) Section III-Statement of the Case, currently pp. 3-21)	ERT	3.40
06/09/23	Revise, in accordance with comments by independent counsel (Kenneth Murena, Esq.), Response to Appellees' 5/31/23 Motion to Strike or Preclude Consideration of Matters Improperly Presented for First Time in Reply Brief	ERT	0.10
06/09/23	Analyze and revise draft correspondence to counsel for Philadelphia Indemnity Insurance Co. (Troy Beecher, Esq.) regarding status of PIIC's claimed investigation of subject claim, 3 pages, drafted by independent counsel (Melanie Damian, Esq.)	ERT	0.20
06/09/23	Analyze and revise draft correspondence to counsel for Philadelphia Indemnity Insurance Co. (Troy Beecher, Esq.) responding to PIIC's apparent denial of subject claim, 3 pages, drafted by independent counsel (Melanie Damian, Esq.)	ERT	0.30
06/09/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss pending matters, request for estoppel letter by former Board member Monica Ghilardi, lawsuits filed against/to be filed against the Association's prior attorneys, and reconstruction of bank accounts by forensic accountants (Kapila Mukamal)	ERT	0.80
06/10/23	Review and forward email re: paint for storage .1	DMG2	0.10
06/11/23	Review and respond to Ken Murena email re: attached letters re: insurance .2; review and respond to Eric Thompson email re: Sarmina lawsuit .1	DMG2	0.30
06/12/23	Strategic zoom conference with Melanie Damian, Russell Landy and Eric Thompson re: Alfaro matter and other impending issues .8; review and respond to Melanie Damian email re: authorization to use Valid8 for forensic accounting .1; review and approve forensic accountants bill .2; review filings in several Hammocks cases .2	DMG2	1.30
06/12/23	Confirmed receipt of lien funds by property manager, as of this date, and drafted satisfactions of liens for E. Thompson review, execution, and recording.	KAG1	1.40
06/12/23	Communication with Melissa Vazquez regarding drafting of	KAG1	0.10

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	satisfactions of liens for Hammocks Community Association from the list she provided.		
06/12/23	Attend (remotely, via Zoom) meeting with D. Gersten and independent counsel (Melanie Damian, Esq. and Russell Landy, Esq.) to discuss pending matters, including insurance issues, tender of policy limits by insurer for one of the Association's prior attorneys, and playground equipment	ERT	0.80
06/12/23	Email correspondence with K. Godwin regarding: 1) status of FirstService Residential's research into pending liens filed by the Association (to identify any liens that have been satisfied and for which a release of lien needs to be filed); 2) draft releases of lien prepared with regard to two particular properties in the Hammocks, for which releases of lien have been requested on an expedited basis, including my revisions to same; and 3) her research of the Hammocks' prior attorneys, including with regard to potential self-dealing as to properties in the Hammocks owned by some of those attorneys	ERT	0.40
06/12/23	Analyze memorandum prepared by K. Godwin regarding her research of the Hammocks' prior attorneys, including with regard to potential self-dealing as to properties in the Hammocks owned by some of those attorneys, 39 pages	ERT	0.40
06/12/23	Revise Release of Claim of Lien for Assessment (drafted by K. Godwin) for 16143 SW 106th Terrace, Miami, Florida 33196 (including analyze underlying Claim of Lien)	ERT	0.20
06/12/23	Revise Release of Claim of Lien for Assessment (drafted by K. Godwin) for 11570 SW 148th Court, Miami, Florida 33196 (including analyze underlying Claim of Lien)	ERT	0.20
06/13/23	Conference with Jesmany Jomarron re: board meeting .2; conference with Eric Thompson re: receiver's monthly report for meeting .2; attend advisory board meeting at the clubhouse 2.6	DMG2	3.00
06/13/23	Communication with E. Thompson regarding release of liens	KAG1	0.10
06/13/23	Communication to and from Melissa Vazquez for clarification on an unclear lien recorded against a property not in Hammocks, yet with Hammocks listed, by a previous attorney.	KAG1	0.20
06/13/23	Reviewed and corrected initial 12 release of liens, and researched and created 13 additional release of liens for Hammocks Community Association on properties that had outstanding, yet paid, claims of liens	KAG1	2.80

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	in the county records.		
06/13/23	Spoke with county clerk and e-records serve provider regarding recording of release of liens, specifically to determine available options for recording releases of liens and cost impact to client.	KAG1	0.30
06/13/23	Continue drafting Initial Brief in Appeal Case No. 23-cv-21612 (continue drafting the following section: 1) Section III-Statement of the Case, currently pp. 3-21)	ERT	0.20
06/13/23	Draft outline of items for the Receiver's Report and items of new business (to be discussed during tonight's Board meeting), 4 pages	ERT	1.60
06/14/23	Review and respond to Ken Murena email containing information on sold vehicles .2; review and forward email to legal team re: new law .1; conference with Alyson Theale re: phone/staffed/response .4; review and forward Alyson Theale email re: call transfer .1	DMG2	0.80
06/14/23	Communication with M. Vazquez regarding completion of release of claim of lien research.	KAG1	0.10
06/14/23	Substantially revise draft Motion to Transfer to Division 22 drafted by A. Dymowski (with regard to case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association, Inc., Case No. 2021-021625-CC-05), 3 pages	ERT	0.40
06/15/23	Draft Motion to Transfer.	AJD3	0.30
06/15/23	Review email from Jesmany Jomarron re: IT .1; review and respond to Chicky Ardisson re: roofing issue .1; review and respond to email from Jesmany Jomarron re: call in number .1; review and respond to Alyson Theale re: call -in issue .1; review email from Corey Tickner re: copier .1; email to/from Jesmany Jomarron re: copier.1	DMG2	0.60
06/15/23	Drafting of Releases of Claims of Liens for property owners that have paid the Hammocks Community Association fees, but for which a release was not recorded.	KAG1	1.60

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
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<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
AJD3	Andrew Dymowski	Law Clerk	120.00	0.30	34.20
DMG2	David Gersten	Partner	700.00	27.30	18,154.50
ERT	Eric Thompson	Partner	400.00	47.00	17,860.00
KAG1	Krys Godwin	Senior Counsel	350.00	37.00	12,302.50
LML3	Leonor Lagomasino	Of Counsel	350.00	2.90	964.25

TOTAL FOR SERVICES	\$51,191.00
LESS DISCOUNT	-2,559.55
TOTAL FEES	\$48,631.45

Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/15/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-171-25881 DATE: 6/23/2023 FedEx service for 817125881,399696452829,Delivery service fees of 21.06 to Office of County Recorder, 22 NW 1ST ST FL 1/MIAMI FL 33128 re: 5539/matter id 1292668	21.06

TOTAL EXPENSES	\$21.06
-----------------------	----------------

Outstanding Statements as of June 29, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21309168	April 19, 2023	\$120,923.25
Statement No 21327142	May 18, 2023	\$87,716.30
Total Accounts Receivable Balance:		\$208,639.55

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1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Beatrice Butchko
100 SE Second Street, Suite 3900
Miami, FL 33131
dgersten@grsm.com

June 29, 2023
ID: GERSP 1292668
Invoice No. 21354173
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH June 15, 2023

Fees For Professional Services:	\$51,191.00
LESS DISCOUNT	-2,559.55
Total for Professional Services:	48,631.45
Expenses and Advances:	21.06
Current Bill:	\$48,652.51

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David Gersten Special Magistrate
ID: GERSP 1292668
Invoice No.: 21354173

June 29, 2023
Page 21

A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
ABA Number (ACH): 121042882
Federal Tax ID: 94-1617026

Domestic and International fund transfer process:
ABA Number (Wires): 121000248
Swift code: Domestic – 121000248
International – WFBIUS6S
Reference: 21354173

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GORDON&REES
SCULLY MANSUKHANI
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1111 Broadway, Suite 1700
Oakland, California 94607
(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Beatrice Butchko
100 SE Second Street, Suite 3900
Miami, FL 33131
dgersten@grsm.com

July 13, 2023
ID: GERSP 1292668
Invoice No. 21360474
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH June 30, 2023

Fees For Professional Services:	\$21,105.00
LESS DISCOUNT	-\$1,055.25
Total for Professional Services:	\$20,049.75
Expenses and Advances:	<u>\$15.39</u>
Current Bill:	\$20,065.14

To those clients on whose behalf services are being performed pursuant to a written Legal Services Agreement which permits the Firm to change its rates at any time by written notice to the Client and for said rates to then apply to all services rendered after such notice has been given, please note that, unless a contrary agreement has been made between the parties, the Firm reserves the right to increase the rates applicable to the subject engagement referenced in this invoice by 5% (five percent) and, in the event this occurs, said new rates shall be applicable to, and reflected upon, subsequent invoices generated thereafter. Please do not hesitate to contact us with any questions regarding the foregoing.

Professional Services

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/08/23	review summary of dockets and notebooks prepared by Ms. Stone regarding all pending matters prepared at inception of receivership	LML3	0.80
06/09/23	[Toorak] review and analyze documents and emails provided by Ms. Stone re analysis of this matter.	LML3	0.70
06/14/23	Begin docket review for each open case to determine current status, pending deadlines, and identify key pleadings which are not in Receiver's files	LML3	3.20
06/16/23	Review Ken Murena email with Cepero brief re: appeal of fee denial and review brief .8; review and respond to Jesmany Jomarron email re: air table issue .1	DMG2	0.90
06/16/23	Research and analysis of property lien recorded by Hammocks Community Association against Rodolfo Nieto and Nilda Gonzalez. Communication with M. Vazquez.	KAG1	0.50
06/16/23	Research and analysis of lien recorded by Hammocks Community Association against southeast commercial property. Communication with M. Vazquez.	KAG1	1.00
06/17/23	Review Avid billing and review for payment .2	DMG2	0.20
06/19/23	Review Russell Landy email with draft complaint and other documents 1.2; email(s) to from Russell Landy re: complaint .1	DMG2	1.30
06/20/23	Review and respond to Krys Godwin email(s) re: liens .2; review avid billing for approval .1; review and respond to communication from Jesmany Jomarron re: homeowner .1; review and respond to Krys Godwin email re: lien information and new system .1; review and respond to Russell Landy email re: ACC and use of shingle roofing .1; review and respond to Russell Landy email re: Juaregi lawsuit .1; review and respond to Russell Landy email re: roofing issue and denial of application .1; conference with Jesmany Jomarron re: issues re: financial, fencing, hotline responses, ACC re: roofs, IT setup, security and upcoming budget process for 2024 1.3	DMG2	2.10
06/20/23	Read responses by M. Vazquez on Nieto and commercial property concerns within Hammocks Community Association. Responded to M. Vazquez; communicated with E. Thompson and D. Gersten with recommended action.	KAG1	0.30

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/20/23	Revised Demand Letter for outstanding liens recorded on Hammocks' properties. Communicated with E. Thompson and D. Gersten.	KAG1	0.60
06/20/23	Communications with Melissa Vazquez regarding a demand letter, interactive neighborhood accounting system, outstanding liens, and the timing of appropriate legal collection actions.	KAG1	0.20
06/20/23	Communication with E. Thompson and D. Gersten highlighting communication with Melissa Vazquez regarding Hammocks' outstanding dues and updated computer neighborhood dues accounting system.	KAG1	0.10
06/21/23	Review avid billing for approval .2; review and respond to Jesmany Jomarron email re: financials for the Hammocks and review same .8 ; review and respond to Jesmany Jomarron email re: credentials .1	DMG2	1.10
06/22/23	Review and respond to Eric Thompson email re: Cepero briefing schedule re: court order .1; review and respond to Jesmany Jomarron email re: Arriaga estoppel .1; review and respond to email from Pete Cabrera re: questions/meeting .1; review and respond to Corey Tickner email re: AB meeting re: contracts .1; conference with Jesmany Jomarron re: pending issues to be discussed with AB .4; conference with Melanie Damian re: various pending issues .3; review and respond to Melanie Damian email re: mulch .1; review Jesmany Jomarron billing .3; review draft of response to motion to dismiss in D&O case .4	DMG2	1.90
06/23/23	Review and respond to Krys Godwin email re: conference .1; review and respond to Eric Thompson email re: Juaregi lawsuit .1; conference with Russell Landy and Eric Thompson re: playground, tennis court and Juaregi lawsuit .2; conference with Krys Godwin and Eric Thompson re: pending lawsuit issues .5; review and respond to Pete Cabrera email re: minutes .1; review and respond to Chicky Ardisson email re: ACC issue .1; review Chicky Ardisson email re: delinquent/prepaid issue .1; review and respond to Eric Thompson email re: Cepero appeal and review opinion from the court with follow-up conference with Eric Thompson re: effect of opinion .3; conference with Melanie Damian re: Cepero appeal .2; review and respond to Adam Ruff email re: new lawsuit .1; review and respond to Eric Thompson email re: edits to response to motion to dismiss .3; review and respond to string email re: mulch for playground .1, conference with Jesmay Jomarron re: multipole upcoming issues including: mulch, Cepero lawsuit, AB/receiver meeting, CPA meeting with Kristen and Chicky; document review re: Carlos' committee.4	DMG2	2.60

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/23/23	Telephone conference with D. Gersten and independent counsel (Russell Landy, Esq.) to discuss status of and strategy with regard to negotiation of contract for acquisition of playground equipment (entered into by prior Board)	ERT	0.20
06/23/23	Analyze and revise draft Complaint to be filed against Jauregui Law, P.A. and Sabino Jauregui (drafted by independent counsel, Melanie Damian, Esq.), 11 pages	ERT	0.40
06/23/23	Analyze and revise draft Response to Motion to Dismiss Complaint to be filed in the case styled Hon. David M. Gersten (Ret.) v. Ligia Capielo, et al., Case No. 2023-015558-CA-01 (drafted by independent counsel, Melanie Damian, Esq.), 15 pages	ERT	0.40
06/23/23	Analyze Court's 6/23/23 Opinion and Order (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS), 10 pages	ERT	0.30
06/23/23	Telephone conference with D. Gersten and K. Godwin to discuss results of K. Godwin's research of the Association's prior attorneys (including for any potential self-dealing relating to properties located in the Hammocks), including items for further follow-up	ERT	0.50
06/26/23	Conference with Ken Murena and Eric Thompson re: Cepero appeal and post opinion issues .5; review and respond to Adriana Pavon email re: payments .1; review and respond to Alexandro Leon email re: fence .1; review and respond to Pete Cabrera email re: roof .1; review email from Eric Thompson the Leo Lagamasino re: court trial date .1; review and respond to Eric Thompson email re: applying late fees issue .1; review and respond to Eric Thompson email re: Sarmina lawsuit .1; review and respond to Eric Thompson email re: lien on commercial property .1; review motion for rehearing in Cepero case .5; review and respond to Eric Thompson email re: Acc application .1; review and respond to Robert Kelley email(s) re: Sarmina case .1; review and respond to Jesmany Jomarron email re: declaration .1; review and respond to Eric Thompson email re: commercial lien .1; review and respond to Pete Cabrera email with application .1; review and forward email from Jame Weinkle to Melanie Damian re: PPP and review same .2	DMG2	2.40
06/26/23	Telephone conference with D. Gersten and independent counsel (Kenneth Murena, Esq.) to discuss strategy going forward in light of Court's 6/23/23 Opinion and Order (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS), including as to potential post-Opinion motions	ERT	0.50

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/26/23	Analyze pertinent Board meeting minutes pertaining to the Association's disclosure of its retention of The Sarmina Cetraro Law Group, P.A. (provided by independent counsel, Russell Landy, Esq.), 33 pages, in furtherance of evaluating strategy as to the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05	ERT	0.40
06/26/23	Detailed email correspondence from K. Godwin regarding the results of her research of the Association's prior attorneys (including for any potential self-dealing relating to properties located in the Hammocks), including items for further follow-up	ERT	0.80
06/26/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding Architectural Control Applications for homeowners Kevin Menocal and Terezinha Gonzalez (including review and execute said Applications)	ERT	0.20
06/26/23	Analyze Appellees' 6/26/23 Motion for Rehearing, 16 pages (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	0.40
06/27/23	Review Chicky Ardisson email re: ACC re: windows .1; review and respond to Eric Thompson/Russell Landy email re: Dorado .1; review and respond to Jesmany Jomarron re: declaration .1; review and respond to Jesmany Jomarron email re: Santos hardship .1; conference c with Melanie Damian re: AUSA, AB meeting and FSR .3; attend receiver's meeting with the advisory board 2.4	DMG2	3.10
06/27/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding pre-receivership Release of Lien presented to FSR by homeowner Luz Dorado and Mr. Dorado's demand for an adjustment to his account based upon same	ERT	0.20
06/27/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding strategy as to pre-receivership Release of Lien presented to FSR by homeowner Luz Dorado and Mr. Dorado's demand for an adjustment to his account based upon same	ERT	0.20
06/27/23	Analyze the Miami-Dade Official Records regarding the pre-receivership Release of Lien presented to FSR by homeowner Luz Dorado, including the underlying Lien, in furtherance of evaluating strategy with regard to same	ERT	0.30
06/28/23	Review and respond to Chicky Ardisson email re: architect .1; revel	DMG2	2.10

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
	and respond to Pete Cabrera email with finalized minutes for my review and approval .2; review and respond to Eric Thompson email re: new lawsuit re" U.S. Bank .2; review and respond to Eric Thompson email re: Ana Danton .1; review and respond to Eric Thompson re: architect .1; review and respond to Corey Tickner email re: items needing repair and proposals re; same .2; review Pete Cabrera and Don Kearns emails re: minutes .1; review and respond to Corey Tickner email re: roof repairs and estimates .1; review and respond to Eric Thompson email with attached emails re: Cetraro collection case .3; conference with Jesmany Jomarron re: meeting .1; conference with Alyson Theale re: contract issues .6		
06/28/23	Chapman - email to FSR requesting status of lien prior to status conference scheduled for June 30 (.2); review docket in preparation to attend status conference and discuss same with Mr. Thompson (.4)	LML3	0.60
06/28/23	Telephone conference with Plaintiff's counsel (Robert Kelly, Esq.) in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05 regarding potentially resolving case	ERT	0.40
06/28/23	Email correspondence with Plaintiff's counsel (Robert Kelly, Esq.) in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05 regarding additional information provided by Mr. Kelly in furtherance of potentially resolving case, including review attached additional information (emails) provided by Mr. Kelly, 11 pages	ERT	0.30
06/28/23	Email correspondence with D. Gersten regarding strategy in light of today's telephone conference with, and additional information provided by, Plaintiff's counsel (Robert Kelly, Esq.) in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05 (in furtherance of potentially resolving case)	ERT	0.20
06/28/23	Meeting with L. Lagomasino regarding strategy for tomorrow's status conference in the case styled Hammocks Community Association Inc vs Valerie M Chapman, Case No. 2022-013489-CA-01 (in preparation for L. Lagomasino's attendance at same)	ERT	0.40
06/28/23	Email correspondence with Ana Danton and independent counsel (Russell Landy, Esq.) regarding information provided by Ms. Danton relating to: 1) loan obtained by the Association for work purportedly performed by Marglli's Gallego's husband; and 2) witness to Board's fraudulent conduct	ERT	0.30

<u>Date</u>	<u>Description</u>	<u>Init</u>	<u>Hours</u>
06/29/23	Review and respond to Corey Tickner email with letter attached for review and comment .2; review and respond to Corey Tickner email re: roofing repairs .1; review and respond to Corey Tickner email re: pool estimates .2; review and respond to Leo Lagamasino email re: court hearing today .1; review and respond to Corey email re: Elite .1; conference with Jesmany Jomarron re: refund/Alfaro issue and how to handle going forward .3; review and respond to Corey Tickner email re: drainage proposal .1; zoom meeting with finance committee chair and CPA and Jesmany Jomarron to formulate a plan going forward 1.3	DMG2	2.40
06/29/23	Chapman - prepare for and attend status conference (1.2); report to Judge Gersten re same (.2); receive response from FSR re lien status (paid) (.1); emails to and from Judge Gersten re dismissal of suit (.2)	LML3	1.70
06/30/23	Review and respond to multiple emails from Eric Thompson re: Cetraro case .2; review and respond to Eric Thompson email re: fees .1; review and respond to multiple emails re: Toorak case(s) .2; review and respond to Melissa Vasquez email re: Arriaga .1; review and respond (to Russell Landy) re: Chicky Ardisson email re: ACC .1; review and respond to Carlos Villalobos email re: CPA .1; conference with Melanie Damian re: updates on several issues including cases and board issues .2; review and respond to Russell Landy email re: Alfaro .1; review and respond to Russell Landy email re: equipment .1	DMG2	1.20
06/30/23	Email correspondence with outside counsel (Maia Aron, Esq. and Darci Cohen, Esq.) regarding strategy going forward to as to the pending cases against the Association filed by Toorak Capital Funding, LLC Case Nos. 2020-22065, 2020-25327, 2020-25383), including with regard to strategy for collection of unpaid assessments due to the Association	ERT	0.30
06/30/23	Email correspondence with Plaintiff's counsel (Robert Kelly, Esq.) in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05 regarding additional information provided by Mr. Kelly in furtherance of potentially resolving case	ERT	0.20
06/30/23	Email correspondence with D. Gersten regarding strategy in light of additional information recently provided by Plaintiff's counsel (Robert Kelly, Esq.) in the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05 (in furtherance of potentially resolving case)	ERT	0.10

Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	700.00	21.30	14,164.50
ERT	Eric Thompson	Partner	400.00	7.00	2,660.00
KAG1	Krys Godwin	Senior Counsel	350.00	2.70	897.75
LML3	Leonor Lagomasino	Of Counsel	350.00	7.00	2,327.50

TOTAL FOR SERVICES	\$21,105.00
LESS DISCOUNT	-1,055.25

TOTAL FEES	\$20,049.75
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Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/20/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-171-25881 DATE: 6/23/2023 FedEx service for 817125881,581116643616,Delivery service fees of 15.39 to ADAM RUFF, 100 SE 2 ST/MIAMI FL 33131 re: /matter id 1292668	15.39

TOTAL EXPENSES	\$15.39
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Outstanding Statements as of July 13, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21309168	April 19, 2023	\$120,923.25
Statement No 21327142	May 18, 2023	\$87,716.30
Statement No 21354173	June 29, 2023	\$49,336.51

Total Accounts Receivable Balance:	\$257,976.06
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(510) 463-8600
Tax ID: 94-1617026

David Gersten
Judge Beatrice Butchko
100 SE Second Street, Suite 3900
Miami, FL 33131
dgersten@grsm.com

July 13, 2023
ID: GERSP 1292668
Invoice No. 21360474
Gersten, David M.

RE: Danton v. Hammocks Community Association

BILLING SUMMARY THROUGH June 30, 2023

Fees For Professional Services:	\$21,105.00
LESS DISCOUNT	-1,055.25
Total for Professional Services:	20,049.75
Expenses and Advances:	<u>15.39</u>
Current Bill:	\$20,065.14

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A/R OPERATING ACCOUNT WIRE INFORMATION

Beneficiary Bank Name: Wells Fargo Bank, N.A..
Bank Address: 420 Montgomery Street, San Francisco, CA 94104
Beneficiary Account: Gordon Rees Scully Mansukhani, LLP
Account Number: 1301118095
ABA Number (ACH): 121042882
Federal Tax ID: 94-1617026

Domestic and International fund transfer process:
ABA Number (Wires): 121000248
Swift code: Domestic – 121000248
International – WFBIUS6S
Reference: 21360474

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To:

Ana Danton v. Hammocks Community Association Inc. Case 2022-007798-CA-01

Invoice

Invoice Date: 6/30/2023
 Invoice No: 23296
 Due Date: Due Upon Receipt

Matter: MME1642

Memo: MME1642 Ana Danton v. Hammocks Community Asso... Ana Danton v. Hammocks Community Asso...

Professional Fees

Date	Description	Staff	Rate	Hours	Amount
05/16/2023	Draft agreed order for defendants' extension of time to answer plaintiff's complaint (.2); Email exchange with opposing counsel in Gersten v Maceda, et al. (.1).	AP	\$325.00	0.30	\$97.50
05/16/2023	[No charge] [Cepero] Review of order of transfer entered in Gersten v Cepero (appeal).	AP		0.10	\$0.00
05/16/2023	Telephone call with Peter Baumberger of Kubicki Draper regarding settlement of Estate of Angel Guzman case for policy limits	AP	\$325.00	0.10	\$32.50
05/16/2023	Prepare for interview of witness.	RML	\$525.00	0.90	\$472.50
05/16/2023	Assess file for background information and draft interview questions for M. Ghilardi daughter-in-law (1.1); assess emails and documents regarding Hermida law for fraudulent transfer complaint basis (.9); begin draft Hermida fraudulent transfer complaint (2.2); research Y. Santiago relationship to case (.4); review and assess correspondence from insurance attorney regarding coverage for crime/theft (.1).	CP	\$275.00	4.70	\$1,292.50
05/16/2023	Telephone call with Peter of Kubicki Draper to discuss settlement negotiations on Estate of Guzman	AP	\$325.00	0.20	\$65.00
05/16/2023	Conference with SAO regarding witnesses (0.5); attend witness interview (4.0); work on related litigation strategy related to same and report same to co-counsel. (0.4).	RML	\$525.00	4.90	\$2,572.50
05/16/2023	Telephone call with FSR regarding response time and various homeowner issues (.5); update regarding SA office statement (.4); reviewing and responding to FSR regarding invoice payments (.3).	MME	\$550.00	1.20	\$660.00
05/16/2023	Review and analyze emails regarding ACC applications.	RML	\$525.00	0.10	\$52.50
05/16/2023	Emails with defense attorney Joseph Cobo regarding extension of time to respond to complaint and request for conference.	TAC	\$525.00	0.20	\$105.00

05/16/2023	[No charge] Telephone call with Carvana to discuss 10-day payment letters.	AP		0.70	\$0.00
05/16/2023	Review Order transferring appeal of Bankruptcy Court's Order denying Rule 60 Motion to District Court presiding over appeal of Bankruptcy Court's orders of contempt and damages and discuss with team members (.1); telephone call with bankruptcy counsel for the Ceperos regarding their demand that Receiver amend his Designation of issues on appeal and related matters and discuss with C. Perez their withdrawal of demand and other matters discussed (.3); telephone calls and emails with insurance counsel assigned to represent Association in wrongful death case regarding summary of investigation, analysis of issues, and recommendation to tender policy limits, exchange emails with A. Pavon regarding same, and coordinate further communications with insurance counsel regarding same and related matters (.3); email from A. Pavon providing update from her call with insurance counsel regarding negotiations with counsel for estate in wrongful death claim and strategize regarding same (.2); review the Ceperos Designation of record on appeal and discuss with team members (.1); review Notice from the District Court in the latest appeal filed by Ceperos of Bankruptcy Court's denial of attorneys' fees and exchange emails with team members regarding same, the judge assignment in latest appeal, and the status of all three appeals from the Ceperos Bankruptcy case (.3); discuss with R. Landy his upcoming interview with witness and possible subjects to address related to claims being asserted against insurance policies (.2); discuss with M. Damian the status of preparation of complaint against insurance carrier, the claims to be asserted, procedures and timetable for sending demand pre-suit, various statements in reservation of rights letter, the latest letter from carrier's accountant, and related matters and strategize regarding same (.4); email from Receiver forwarding signed power of attorney forms for purposes of obtaining titles to stolen vehicles for purposes of insurance claims and discuss with team members status of same (.1); review letter regarding non-service of Subpoena on Capital One and coordinate confirming Registered Agent and re-serving Subpoena (.1); emails with counsel for defendants in D&O action and T. Culmo regarding counsel's request for extension of time to respond to Complaint and scheduling of call to discuss the case and discuss with team members same and related matters (.2); email from Popular Bank requesting various financial documents for the Association, information, and updates regarding the receivership and the Association's elections, send email to property manager requesting the financial document requested by the bank, and gather and send to the bank other requested information, documents, and updates (.4); review email from former counsel for Association forwarding order reinstating Chapter 13 bankruptcy case of homeowner, review same, and exchange emails with R. Landy regarding same (.2).	KDM	\$525.00	2.90	\$1,522.50

05/17/2023	Assess status of subpoena returns for Albri consulting (.1); correspondence with Chase bank regarding subpoena compliance (.2); call with F. Fitzpatrick at Chase regarding compliance with subpoena (.2); review and assess records produced by Chase bank related to Albri consulting (1.4); review P. Arcia settlement agreement (.1).	CP	\$275.00	2.00	\$550.00
05/17/2023	Review and analyze emails regarding ACC resubmitted application for Suete, complete forms and draft email to E. Thompson regarding same (0.3); work on documents related to Albri Consulting (0.1); review and analyze documents provided by Chase bank related to Albri Consulting LLC (0.6); call with Forensic Accountant (0.2); formulate claims related to attorneys (0.3).	RML	\$525.00	1.50	\$787.50
05/17/2023	Review draft Motion to Transfer; prepare email to Joseph Cobo requesting review and comment to Motion to Transfer.	TAC	\$525.00	0.30	\$157.50
05/17/2023	Emails to follow-up with FSR.	MME	\$550.00	0.30	\$165.00
05/17/2023	Continue draft of Hermida Law Fraudulent transfer complaint.	CP	\$275.00	1.00	\$275.00
05/17/2023	Emails with L. Diaz regarding corrected Subpoena to Capital One, procedure for serving same through online portal, review same and corrected Subpoena, and coordinate serving same on Capital One through portal and process server, emailing it to the parties (.2); prepare and send email to counsel for Advisory Board regarding the letter from crime insurance carrier reserving rights and suggesting it intends to deny Receiver's claim against crime policy and further strategize regarding responding to same and preparation of complaint against carrier (.4); provide further input to C. Perez regarding preparation of complaint against carrier (.2); further email from counsel for Advisory Board regarding same and strategy for pursuing policy proceeds (.2); email from homeowner regarding the status of her account with the association and whether she has a positive or negative balance and send email to FSR regarding same and requesting response to homeowner (.1).	KDM	\$525.00	1.10	\$577.50
05/18/2023	Call with E. Thompson regarding tax deed matter (0.2); work on claims strategy (0.1).	RML	\$525.00	0.30	\$157.50
05/18/2023	Receipt and review email from Joseph Cobo regarding Motion to Transfer.	TAC	\$525.00	0.10	\$52.50
05/18/2023	Update call with receiver regarding pending litigation and reporting matters.	MME	\$550.00	0.50	\$275.00

05/18/2023	Further emails with team members regarding service of updated Subpoena on Capital One and receive updates regarding same (.1); telephone call and email from homeowner regarding the status of her account with Association and current balance, exchange emails with M. Damian regarding same and status of having FSR provide information to homeowner, emails with L. Diaz regarding communications with homeowner, and follow up with FSR regarding same (.3); emails with E. Thompson regarding the status of preparation of the next Receiver's Status Report and need for extension of time to file same and propose seeking longer reporting periods to facilitate preparation and timely filing of future reports and coordinate preparation of Motion for extension of time (.2); emails with A. Pavon regarding deadlines to file status reports and related matters (.1); further review documents from forensic accountant requested by Popular Bank for purposes of Bank's quarterly review, continue working on gathering additional requested documents, and send email to FSR regarding status of locating and producing additional documents (.4); review various Orders regarding complex business litigation division procedures entered in action against directors and officers and emails with team members regarding same (.2); emails with A. Pavon regarding same, confirming deadlines and related matters, strategy for the case, and upcoming call with prospective counsel for Defendants (.3).	KDM	\$525.00	1.60	\$840.00
05/19/2023	Email exchange with advisory board to discuss fourth supplemental status report (.1); draft motion for extension of time to file fourth supplemental status report and order on same (.5).	AP	\$325.00	0.60	\$195.00
05/19/2023	Call with Receiver regarding litigations strategy and witness interviews (0.7); review and analyze email from Chief Tamayo and draft response (0.1); email exchange with Property Manger and unit owners regarding ACC applications (0.3); email exchange with members of Advisory Board regarding playground and fitness equipment (0.2).	RML	\$525.00	1.30	\$682.50
05/19/2023	Receipt of homeowner complaint and email regarding same.	MME	\$550.00	0.40	\$220.00

05/19/2023	Emails with counsel for Advisory Board and A. Pavon regarding consent to proposed extension of time to file Receiver's next Status Report (.1); review and revise Motion for extension of time and proposed order granting same, review further emails with A. Pavon and counsel for Plaintiff confirming no objection to same, and coordinate finalizing and filing same (.3); emails and telephone calls with M. Damian and E. Thompson regarding seeking to amend schedule for filing the Receiver's Status Report and provide direction to A. Pavon regarding preparation of motion for same (.2); review email to counsel for Plaintiff and Advisory Board regarding proposed new schedule for filing Status Reports and further discuss with team members (.1); email from A. Pavon forwarding draft Motion and proposed Order and begin reviewing and revising same (.2); review Order granting motion for extension of time to file the next Status Report and discuss new deadline with team members (.1); review Motion for extension of time to respond to Complaint in D&O action and Notice of Appearance by Defendants' counsel and discuss with team members (.1).	KDM	\$525.00	1.10	\$577.50
05/19/2023	[No charge] Finalize and file motion for extension to file fourth supplemental report (.3); finalize and submit to Judge proposed order on same (.2); complete notice of appeal to special magistrate regarding violation (.3).	rs		0.80	\$0.00
05/20/2023	Review billing statement from First Insurance regarding insurance premiums for certain policies of the Association and coordinate payment of same (.1); review status of payment of premiums for other insurance policies, exchange emails with team members regarding same, and request confirmation of same (.1).	KDM	\$525.00	0.20	\$105.00
05/21/2023	Review and analyze email from Ms. Ginarte regarding ACC application and draft email to Property Manager regarding same.	RML	\$525.00	0.10	\$52.50
05/21/2023	Rasco - Review and analyze Court's Order Setting Initial Case Management Conference and to Prepare a Mandatory Case Management Report, Order on memorandum requirements, notice regarding complex litigation procedures, and order on mandatory meet and confer requirements.	RML	\$525.00	0.20	\$105.00
05/22/2023	Work on claims strategy against group of criminal defense lawyers (0.4); work on motion to transfer Rasco Klock case to Judge Butchko (0.1); review and analyze payments to Compufix and J. Cue (0.2); review and analyze Alfaro and Fernandez documents (0.3); call with Property Manager regarding ACC applications (0.2); review and revise motion to transfer Rasco Klock case to Division 22 (0.3); email exchange with J. Jammaron regarding fitness equipment contract (0.1).	RML	\$525.00	1.60	\$840.00
05/22/2023	Meeting regarding case strategy and to-do items (.3); assess document search strategy regarding transfers to fictitious entities (.3); assess transfers to several criminal attorneys for background to complaint (.3); continue first draft of fraudulent transfer complaint against criminal attorneys (3.1).	CP	\$275.00	4.00	\$1,100.00

05/22/2023	Reviewing and approving operation invoices and cash flow (.3); reviewing and providing comments on reply brief Cepero appeal (.5).	MME	\$550.00	0.80	\$440.00
05/22/2023	Conference with Joseph Cobo to discuss case and draft Motion to Transfer.	TAC	\$525.00	0.50	\$262.50
05/22/2023	Draft motion to transfer from complex business division.	il	\$150.00	0.60	\$90.00
05/22/2023	Review documents regarding checks for Jesus Cue and Javier Cepi pertaining to shell corporations WorldWide Business Solutions and Compfuix.	il	\$150.00	2.40	\$360.00
05/22/2023	Discuss with A. Pavon issues with transferring title to additional vehicles to Carvana and provide direction regarding resolving same and related matters (.2); email from E. Thompson forwarding draft Reply Brief in the appeal of the Bankruptcy Orders entered in the Ceperos bankruptcy case, review and revise same, discuss with M. Damian her revisions to same, make further revisions, and send to E. Thompson and Receiver (2.9); review applicable Rules for appeals from Bankruptcy Court and District Court and provide input to E. Thompson regarding same (.2); email from insurance counsel for the Association regarding the proposed settlement within policy limit of wrongful death claim against Association and forthcoming settlement documents, exchange emails and discuss with A. Pavon, and send email to the Receiver regarding same (.4); emails from counsel for Advisory Board and counsel for Plaintiff regarding their consent to proposed resetting of the reporting periods for the Receiver's Status Reports and whether Receiver is also proposing to change fee application period and send email to M. Damian regarding same (.1).	KDM	\$525.00	3.80	\$1,995.00
05/23/2023	Telephone call with Raquel De Mola, Esq. regarding responses to Rodriguez v Hammocks Complaint (.1); receipt and review of answer and affirmative defenses to be filed in Rodriguez v Hammocks (.4).	AP	\$325.00	0.50	\$162.50
05/23/2023	Email and text exchanged with Melissa Vazquez to discuss receipt of ticket for unidentified vehicle (.1); email exchange with Detective Polo to discuss stolen vehicles and new evidence (.1)	AP	\$325.00	0.20	\$65.00
05/23/2023	Draft response letter to M. Ghilardi regarding estoppel certificate (.3); research writ of attachment usage (.5).	CP	\$275.00	0.80	\$220.00
05/23/2023	Review and revise motion to transfer.	RML	\$525.00	0.10	\$52.50
05/23/2023	[No charge] Review of Gersten/Hammocks v. Capitol, et al docket, deadlines and multiple court orders.	AP		1.20	\$0.00
05/23/2023	[Cepero] Review status of pleadings in Regarding Cepero appeal : 1:22-cv-22686-RNS to determine deadlines and status of record transmission; review status of pleadings in Regarding appeal: 1 23-cv-21795-DPG to determine deadlines.	AP	\$325.00	0.90	\$292.50
05/23/2023	Review documents regarding checks for WorldWide Business Solutions and Compfuix.	il	\$150.00	2.50	\$375.00

05/23/2023	Emails with E. Thompson and the Receiver regarding the revisions to the Reply Brief in the appeal of the Bankruptcy Court's orders and judgment in the Ceperos bankruptcy case and the status of finalizing and filing same (.1); further emails with Receiver regarding the proposed settlement of the wrongful death claim against the Association and certain provisions in same and further strategize with team members regarding same (.2); emails with insurance counsel for the Association regarding the draft Answer and Affirmative Defenses to a personal injury complaint filed against Association, review same, exchange emails with A. Pavon regarding same, and emails with insurance counsel regarding same (.5); emails with A. Pavon regarding the check received from CIT Bank and depositing of same in Association's account (.1); emails with A. Pavon regarding various deadlines related to the Case Management Conference in D&O action, preparation of Joint Scheduling Report, and scheduling call with Defendants' counsel regarding same, and provide input regarding same (.3); emails with E. Thompson regarding the deadline to file initial appellate brief in the Receiver's appeal of the Bankruptcy Court's Order denying Rule 60 Motion, work with A. Pavon on confirming whether the record on appeal has been transmitted to the District Court, review docket, and exchange emails with A. Pavon regarding same (.2); emails with M. Damian and counsel for Plaintiff regarding the proposed new scheduling for filing Status Reports and Fee Applications (.1).	KDM	\$525.00	1.50	\$787.50
05/24/2023	Email exchange with Raquel De Mola regarding filing of answer in Rodriguez v Hammocks (.1); review of proposed response In Re Rodriguez matter and review of Complaint for same (.7); review of Complaint filed in re Rodriguez Matter (.2).	AP	\$325.00	1.00	\$325.00
05/24/2023	Review and revise complaint against criminal defense attorneys and work on claims strategy.	RML	\$525.00	0.40	\$210.00
05/24/2023	Review and analyze documents related to Compufix and Worldwide Business Solutions (0.2); email exchange with Forensic Accountant (0.1).	RML	\$525.00	0.30	\$157.50
05/24/2023	Email exchange with S. Demos regarding service and response to complaint.	RML	\$525.00	0.10	\$52.50
05/24/2023	[No charge] Internal correspondences with K. Murena regarding bankruptcy deadlines for initial brief in Gersten v. Cepero (second appeal)(.1); Review of case dockets and status of pleadings in Regarding Cepero matters (.3).	AP		0.40	\$0.00
05/24/2023	Apply edits and draft second draft of fraudulent transfer complaint against criminal attorneys.	CP	\$275.00	0.70	\$192.50
05/24/2023	Prepare joint scheduling report in Gersten v Capielo, et al.	AP	\$325.00	0.90	\$292.50
05/24/2023	[No charge] Email exchange with K. Murena to discuss receipt of check from CIT Bank.	AP		0.10	\$0.00
05/24/2023	Reviewing and revising complaint against criminal attorneys and e-mails regarding same.	MME	\$550.00	1.20	\$660.00

05/24/2023	[No charge] Work on document, review of checks for Compufix, WorldWide Business Solutions and Albri Consulting Shell Corporations.	il		4.00	\$0.00
05/24/2023	Additional review of checks and invoices for the Sarmina Cetraro law firm that represented the hammocks in 2015; review unpaid legal fees.	il	\$150.00	2.50	\$375.00
05/24/2023	Further emails with E. Thompson regarding the deadline to file Initial Brief in Receiver's appeal of Bankruptcy Court's Order denying Rule 60 Motion, review and forward order setting deadline, review docket in appeal, discuss with A. Pavon, provide direction regarding timing of transmittal of the record on appeal, receive report regarding communications with clerks of Bankruptcy and District Courts, and provide further input regarding same (.4); further emails with A. Pavon regard transfer of account balances from CIT Bank to Association's new account and the status of closing accounts and provide input regarding same (.2); further emails with A. Pavon and insurance counsel assigned to represent Association in personal injury claims regarding the Answer and Affirmative Defenses (.1); discuss with M. Damian preparation of letter responding to reservation of rights letter from counsel for crime policy carrier and the status of preparation of complaint against carrier, send email to P. Baloyra regarding our claim and proof of loss and preparation of response reservation of rights letter, and further strategize regarding same (.3); emails with team members regarding the Case Management Conference in the D&O action against former board members (.1).	KDM	\$525.00	1.10	\$577.50
05/24/2023	[No charge] Review court bankruptcy file all appeal cases (.5); email to A. Pavon regarding same (.2); telephone conference with bankruptcy clerk regarding designation of items (.1); telephone conference with Judge Scola's law clerk regarding order on deadlines (.1); email to K. Murena and A. Pavon regarding same (.2).	rs		1.10	\$0.00
05/25/2023	Edit and complete third draft of fraudulent transfer complaint against criminal attorneys (.8); finalize draft for distribution and review (.2); correspondence with S. Banez regarding transfer schedule (.2); multiple calls with forensic accountant regarding check schedules (.2); apply edits and complete preliminary final draft of complaint for review (.6).	CP	\$275.00	2.00	\$550.00
05/25/2023	Email exchange with K. Murena regarding direction on modifying schedule order and motion on same.	AP	\$325.00	0.10	\$32.50
05/25/2023	Review and revise complaint against criminal defense attorneys (0.4); email exchange with Forensic Accountant (0.1).	RML	\$525.00	0.50	\$262.50
05/25/2023	[Rasco Klock] Review and revise Summons and work on service of process (0.1); draft email to Receiver regarding litigation strategy (0.1).	RML	\$525.00	0.20	\$105.00

05/25/2023	Emails with E. Thompson regarding the transcript of the hearing on Receiver's Rule 60 Motion for relief from Contempt Orders and Judgment in Ceperos Bankruptcy case, for transcript to E. Thompson, review portions of transcript, and strategize regarding arguments to include in Initial Appellate Brief (.4); discuss with M. Damian the draft Complaint against criminal counsel for Gallego seeking to recover fraudulent transfers, review and revise same, coordinate having C. Perse make further revisions to same, review and coordinate revisions to schedules of transfers, and further discuss with M. Damian (1.1); discuss with M. Damian obtaining records related to Cortland's property within the Hammocks for purposes of personal injury claim against Association, discuss with A. Pavon status of responses to Subpoena to Cortland and communications with its counsel regarding same, emails with counsel for Association regarding same (.3); further discuss with M. Damian preparation of response to crime insurance carrier's reservation of rights letters, response arguments to make, and strategize regarding same (.2); email from A. Pavon providing draft Joint Case Management Report for D&O action and confirming related deadlines and Case Management Conference, and begin reviewing draft Report (.2).	KDM	\$525.00	2.20	\$1,155.00
05/26/2023	Review and revise complaint against criminal defense attorneys and draft email to Receiver regarding same.	RML	\$525.00	0.40	\$210.00
05/26/2023	Review and analyze documents related to Sarmina invoices.	RML	\$525.00	0.20	\$105.00
05/26/2023	Review and analyze emails from Receiver and review and analyze documents related to Lakeview painting project.	RML	\$525.00	0.20	\$105.00
05/26/2023	Review and analyze emails regarding Lakeview painting project and review and analyze related documents.	RML	\$525.00	0.20	\$105.00
05/26/2023	Call with Forensic Accountant regarding fraudulent transfer claims.	RML	\$525.00	0.30	\$157.50
05/26/2023	[No charge] Work on document review of Compufix, Worldwide Business Solutions and Albri Consulting shell corporations and draft an email to States Attorneys office regarding same.	il		2.00	\$0.00
05/26/2023	Discuss with R. Landy my revisions to the Complaint against criminal counsel for Gallego and certain elements of Receiver's claims and supporting evidence and coordinate confirming certain information with forensic accountant for Receiver (.2); review and revise Motion to modify schedule for filing the Receiver's Status Reports and proposed Order granting same, further discuss with A. Pavon, and coordinate sending to E. Thompson (.5); emails with FSR and R. Landy regarding address to which a homeowner has been sending maintenance fees, investigating same, and obtaining cancelled checks from homeowner (.2).	KDM	\$525.00	0.90	\$472.50
05/30/2023	Conduct DISCO search regarding Y, Santiago retainer agreement and representation (1.2); conduct DISCO search regarding R. Pardo representation (.5); conduct research into Ace Law representation (.4).	CP	\$275.00	2.10	\$577.50

05/30/2023	Email exchange with Eric Thompson (0.1); review and analyze email from M. Davis regarding financial statements (0.2); review and analyze email from Ms. Ginarte regarding ACC application (0.1); work on strategy related to claims against criminal defense attorneys (0.2); work on strategy related to claims against certain fraudulent transfer claims (0.2); email exchange regarding ACC applications (0.1).	RML	\$525.00	0.90	\$472.50
05/30/2023	Draft memorandum regarding Compufix, WorldWide Business Solutions, and Albri Consulting shell corporations.	il	\$150.00	1.00	\$150.00
05/30/2023	Emails with E. Thompson, R. Landy, and M. Damian regarding the upcoming hearing on Sarmina Cetraro's motion for relief from the stay in the Receivership Order and coverage of same (.1); emails with counsel for Cortland and A. Pavon regarding proposed extension of time to respond to the Subpoena and further discuss with A. Pavon same and the status of the personal injury action for which documents were subpoenaed (.2); review transmittal of the record on appeal from the Bankruptcy Court and in the District Court and Notice setting deadlines to file appellate briefs, discuss with team members, exchange emails with E. Thompson regarding same, and strategize regarding same (.3); review appearance by counsel for Alfaro and Fernandez and discuss with team members (.1); review letter from Capital One in response to Subpoena, follow up on serving by process server on registered agent, and discuss with team members (.2); emails with FSR regarding communications with homeowner who sent checks to PO Box in Arizona and the status of obtaining copies of cancelled checks to confirm account into which funds were deposited, review emails from homeowner and documents and spreadsheet provided by homeowner, and provide direction regarding further investigation (.3); email from forensic accountant regarding the status of their reconstruction of the Association's accounts and the records still needed from certain banks and emails with A. Pavon regarding same (.2).	KDM	\$525.00	1.40	\$735.00
05/30/2023	[PIIC] Review letter from counsel for PIIC and review affidavit of state attorney's office in support of arrest warrants to prepare response to letter.	PB	\$400.00	1.80	\$720.00
05/31/2023	Call from Sabido Jauregui (0.3); work on related claims strategy (0.1); call from M. Harley regarding Great American Restitution payments (0.2); call from Marisely Ginarte regarding ACC application (0.3); work on litigation strategy (0.2).	RML	\$525.00	1.10	\$577.50
05/31/2023	Revise subpoena to Capital One Auto Finance (.2); Receipt of correspondence from Capital One (.1).	AP	\$325.00	0.30	\$97.50
05/31/2023	Email exchange with Eric Thompson regarding modification of court order regarding Receiver's status reports.	AP	\$325.00	0.10	\$32.50

05/31/2023	Conduct DISCO search for engagement and retainer letter from criminal attorney (.5); call with third party regarding subpoena response extension (.1); correspondence with third party counsel regarding extension (.2).	CP	\$275.00	0.80	\$220.00
05/31/2023	Email exchanges with Eric Thompson regarding strategy for reply brief on Cepero appeal matter	AP	\$325.00	0.10	\$32.50
05/31/2023	Rasco - Review and analyze email from T. Boyd, review and analyze relevant Court orders, and draft response (0.2); work on compliance with CBL procedures (0.2).	RML	\$525.00	0.40	\$210.00
05/31/2023	Emails with E. Thompson and A. Pavon regarding revisions to Motion to modify schedule for filing the Receiver's Status Reports and further discuss with A. Pavon (.2); review and approve updated Subpoena to Capital One and emails with team members regarding serving same, and review email forwarding same to counsel for Plaintiff and counsel for Advisory Board (.2); email and telephone call from counsel or Off-Duty Services of South Florida regarding Subpoena and request for extension of time to respond to same, discuss with A. Pavon, and coordinate agreeing to brief extension (.2); review the Ceperos's Motion to Strike matters presented in Reply Brief in the Association's Appeal of the Bankruptcy Court's Contempt Orders and Judgment, discuss with team members same, response deadline, and preparation of response, and send to Receiver and E. Thompson (.3); emails with E. Thompson regarding various arguments to make in response to Motion to Strike and issues to be addressed in Initial Brief of appeal of Order denying Rule 60 Motion and strategize regarding same (.4); further emails with A. Pavon regarding obtaining missing records from various banks and provide further input regarding same (.3); review Motion to Transfer D&O Action to Judge presiding over receivership and Notice of Hearing on same and discuss with team members (.2); review the Ceperos Designation of Record on Appeal, discuss with team members, and confirm deadline to file Initial Appellate Brief on attorneys' fees issue (.2); email from insurance counsel for the Association forwarding draft Release and Hold Harmless/Confidentiality Agreement for purposes of settlement of wrongful death claim, review same, and forward to Receiver and E. Thompson for review, revisions, and approval (.3).	KDM	\$525.00	2.30	\$1,207.50
05/31/2023	Legal research regarding imputation of bad actors' knowledge to homeowner association, homeowner association's duty to act.	PB	\$400.00	1.30	\$520.00
06/01/2023	[No charge] Email exchange with Eric Thompson regarding modification of court order and authority from opposing counsel.	AP		0.10	\$0.00
06/01/2023	Review and analyze documents provided by S. Juregui (0.2); review and analyze email from M. Ginarte regarding incomplete ACC application and draft response (0.1).	RML	\$525.00	0.30	\$157.50

06/01/2023	Emails with Receiver and E. Thompson regarding approval of the Release and Hold Harmless/Confidentiality Agreement, discuss with team members, and send email to insurance counsel for the Association regarding same (.2); emails with counsel for Plaintiff and E. Thompson regarding final version of Motion to modify schedule for filing Receiver's Status Reports and approval of same, review same, and coordinate finalizing and filing same (.2); multiple emails with homeowner, M. Dhanji and FSR regarding confirming homeowner does not owe any Association dues or assessments and obtaining estoppel letter and other written confirmation of same, and addressing other issues raised by homeowner (.4); work on closing the accounts at Truist Bank, emails with account manager and Vice President regarding same and reversing fees assessed to accounts, and emails with M. Dhanji regarding the status of same (.4); work on gathering monthly statements from Truist Bank, review same, and send to M. Dhanji (.3); emails with M. Damian regarding invoice from Radius Global Solutions and review and investigate same (.2).	KDM	\$525.00	1.70	\$892.50
06/02/2023	Review and analyze documents produced by Alfaro & Fernandez (0.1); review and analyze documents related to Compufix and Worldwide (0.3); call with C. Ardisson and J. Jammaron regarding Playground Equipment and ACC panel (0.8).	RML	\$525.00	1.20	\$630.00
06/02/2023	Reviewing AVID invoices and approving, e-mails concerning same.	MME	\$550.00	0.40	\$220.00
06/02/2023	Work on discovery request related to lawsuits against former professionals.	il	\$150.00	0.60	\$90.00

06/02/2023	Emails with team members regarding new deadlines for filing Receiver's Status Reports and related matters and provide input regarding same and notifying all team members (.2); review the Ceperos's corrected Designated Record on Appeal for their appeal of Bankruptcy Court's Order denying request for fees and discuss with team members same and related matters including corresponding initial appellate brief deadline (.2); further discuss with team members the deadline to respond to Ceperos's Motion to strike arguments in Reply Brief (.1); review Notices from the Clerk's Office regarding the Ceperos's Designated Record on Appeal and other filings related to appeal and need to correct same (.1); discuss with M. Damian issues with closing the Truist accounts and follow up with Truist Bank regarding same (.2); review Orders entered in bankruptcy cases in which Association is creditor transferring case to new bankruptcy judge (.1); further emails with Receiver regarding the settlement of wrongful death claim and the scope and extent of the confidentiality agreement for purposes of reporting settlement to the Receivership Court and review and confirm same (.2); email from FSR providing various financial records requested by Popular Bank for purposes of quarterly review, review same, and prepare and send email to Popular Bank forwarding same and providing additional information (.6); email from FSR forwarding copies of checks from homeowner sent to PO Box in Arizona, review same, and provide further input regarding investigation of same (.2); further emails with FSR regarding confirming account balances and amounts owed by other homeowners who sent payments to PO boxes and to former counsel for the Association, and homeowners requests for return of security deposits, and strategy regarding procedures and protocol for addressing these issues (.2); review letter from accountant for crime insurance carrier confirming the latest information and documents received in response to their requests and the status of their consideration of same and forwarding P. Baloyra for purposes of responding to the carrier's attorney's reservation of rights letter (.2).	KDM	\$525.00	2.30	\$1,207.50
06/04/2023	Email exchange with M. Ginarte regarding ACC application.	RML	\$525.00	0.10	\$52.50
06/04/2023	Further emails with Receiver regarding the settlement of the wrongful death claim and reporting same in the next Receiver's Status Report (.1); confirm deadline to respond to the Ceperos Motion to Strike portions of Receiver's Reply Brief in initial appeal of contempt and damages orders and judgment and strategize regarding certain response arguments (.2).	KDM	\$525.00	0.30	\$157.50
06/04/2023	[No charge] Review bankruptcy court file (.3); review third appeal designations and court notice (.2).	rs		0.50	\$0.00
06/05/2023	Review and analyze email from Receiver regarding email from Alejandro Leon and review and analyze email from A. Leon (0.2); work on claims strategy against fraudulent transfer claimants (0.1); email exchange with Property Manager regarding potential fireworks display (0.1); review and revise demand letter to S. Leal (0.1).	RML	\$525.00	0.50	\$262.50

06/05/2023	Review and edit preliminary final draft of complaint against criminal attorneys (1.0); edit new order of exhibits (.1); draft insurance demand letter to Santiago Law (.3).	CP	\$275.00	1.30	\$357.50
06/05/2023	Quintero Complaint - Review and analyze revised draft complaint and work on related strategy.	RML	\$525.00	0.20	\$105.00
06/05/2023	Reviewing homeowner e-mail and responding.	MME	\$550.00	0.30	\$165.00
06/05/2023	Further emails with Popular Bank regarding the various financial records provided for purposes of the Bank's quarterly review and whether the Association has year-end audited or unaudited financials, review various financial records to located requested statements, and work on confirming existence of statements with FSR and forensic accountants (.4); review Notice of Withdrawal of Designation of the Record on Appeal and corrected Designation of the Record by the Ceperos in appeal of Bankruptcy Court's Order denying Motion for fees and discuss with team members same and related issues (.3); emails with First Citizens Bank/CIT Bank regarding the status of the Association's account and discuss with team members (.2); review correspondence with counsel for former officers and directors regarding scheduling depositions in D&O action (.1); emails with A. Pavon regarding the status of the sale, repair, and insurance claims for various vehicles and related matters and discuss with M. Damian (.2); emails with A. Pavon regarding status of receiving responses and productions pursuant to Subpoenas and coordinate following up on same (.1); email from R. Landy and former counsel for Association forwarding Notice of Amended Chapter 13 Plan of a homeowner and review same (.2).	KDM	\$525.00	1.50	\$787.50
06/05/2023	Review materials and draft response to letter from crime policy insurer.	PB	\$400.00	6.50	\$2,600.00
06/06/2023	Email exchange with Melissa Vazquez to discuss status on vehicles being repaired.	AP	\$325.00	0.10	\$32.50
06/06/2023	Conference with Forensic Accountant (0.6); call with code officer and email exchange with Receiver and Property Manager regarding same (0.2); draft email response to Ms. Ginarte regarding ACC application (0.2); formulate subpoena strategy (0.2); work on recovery of assets (0.2); review and analyze email from FSR regarding fireworks vendor and draft email to Receiver regarding same (0.2).	RML	\$525.00	1.60	\$840.00
06/06/2023	Work on Quintero complaint and notice of related cases (0.2); revise complaint (0.1).	RML	\$525.00	0.30	\$157.50
06/06/2023	Conference with forensic accountant regarding payment tracing (.5); edit and finalize letter to Santiago Law (.1); confer regarding outstanding complaints (.2); begin draft complaint against criminal attorney for fraudulent transfer and malpractice (3.5); review and assess transfers to unknown M. Ghilardi accounts (.3); assess subpoenas needed for additional account information and work on related issues (.2).	CP	\$275.00	4.80	\$1,320.00
06/06/2023	Draft and revise memorandum regarding the settlement of Guzman v Hammocks.	AP	\$325.00	1.20	\$390.00

06/06/2023	Telephone call with adjuster on crime policy to discuss needed information.	AP	\$325.00	0.30	\$97.50
06/06/2023	Email from forensic accountant forwarding certain 2022 financial statements with explanation regarding same, review same, and send to Popular Bank with explanation for purposes of quarterly review (.4); emails with Popular Bank and forensic accountant regarding the preparation of year-end financial statements for 2022 and strategize regarding same (.2); emails with forensic accountant and R. Landy regarding preparation of 2022 financials and scheduling call to discuss same and related matters (.2); discuss with A. Pavon the status of obtaining records from various banks for purposes of completing account reconstructions and provide further input regarding same (.2); emails with team members regarding deadline for us to file our Designation of Record on Appeal for the Ceperos appeal of Bankruptcy Court's denial of request for fees and provide direction to A. Pavon regarding preparation of same (.2); emails with M. Dhanji and FSR regarding the status of gathering and providing documents requested by homeowner regarding the balance of her account with Association and related matters, follow up on same, provide input regarding same, and email from homeowner regarding scheduling call to discuss same (.2); discuss with A. Pavon deductible for the Association's assigned insurance counsel for purposes of wrongful death claim and preparation of summary of settlement of same and provide further input regarding same (.2); discuss with A. Pavon certain issues to related to repair, title, and sale of certain vehicles of Association, and coordinate following up on same (.1); email from counsel for former directors and officers regarding the proposed Order granting Motion for Extension of Time to respond to Complaint, review same, emails with T. Culmo and opposing counsel regarding approval of same, review email to the Court submitting same for entry, review entered Order and discuss new response deadline with team members (.2); email from accountant for crime insurance policy carrier listing additional information and evidence needed to complete investigation of our proof of loss, emails with team members regarding same, send email to forensic accountant regarding same, and strategize regarding same (.3); provide further input to C. Perez regarding preparation of Complaint against crime insurance policy carrier (.3); emails with P. Baloyra regarding revised response to reservation of rights letter from counsel for crime policy carrier and review same (.2).	KDM	\$525.00	2.70	\$1,417.50
06/06/2023	[No charge] Emails to and from Cristina Hernandez Villar regarding proposed Agreed Order on Motion for Extension of Time to respond to Complaint.	TAC		0.20	\$0.00
06/06/2023	Additional legal research regarding imputation, notice of claim, and notification of claim to insurer and review, revise response to reservation of rights letter.	PB	\$400.00	6.80	\$2,720.00
06/07/2023	Review and analyze documents provided by Forensic Accountant (0.1); work on fireworks matter and calls with J. Jammaron regarding same (0.3); review and analyze documents related to transfers to Ghilardi (0.2).	RML	\$525.00	0.60	\$315.00

06/07/2023	Prepare for call with opposing counsel (0.2); call with opposing counsel regarding background of case (0.5); work on litigation strategy (0.1).	RML	\$525.00	0.80	\$420.00
06/07/2023	Email exchange with Melissa Vazquez regarding status of vehicles.	AP	\$325.00	0.10	\$32.50
06/07/2023	Work on subpoena to bank issues regarding payments on house (.5).	CP	\$275.00	0.50	\$137.50
06/07/2023	Further emails with forensic accountant regarding preparation of financial statements for the Association and confirming availability for call (.1); continue working with P. Baloyra on letter responding to reservation of rights letter by counsel for crime insurance policy carrier and strategize regarding responding to latest request from accountant for carrier investigating proof of loss (.7); continue working with C. Perez on strategy for same and formulation of claims for Complaint against crime insurance carrier (.6); telephone call with P. Baloyra and C. Perez regarding revisions to make to response to reservation of rights letter from counsel for crime policy carrier, preparation of Complaint against carrier, response to carrier's accountant's latest letter requesting additional documents and information for purposes of evaluating proof of loss, and related matters, strategize regarding same, and provide further direction regarding same (1.5); work on providing various correspondence and documents sent to carrier's accountant to P. Baloyra and C. Perez and further strategize regarding same (.4); emails with forensic accountant regarding same and confirming various documents and information provided to accountant and confirm call to further discuss same (.2); emails with A. Pavon regarding her call with accountant for crime insurance carrier and the preparation of response to accountant's email requesting additional documents and information (.2); further emails with FSR regarding the Association's financial statements and related documents and the upcoming call to further discuss, and review documents provided by FSR including unaudited financial statements, and prepare and send email to Popular Bank forwarding same (.3); emails with E. Thompson regarding the Designation of the Record on Appeal for the Receiver's appeal of Order denying Rule 60 Motion and the status of preparation of the appellate brief and certain argument therein (.2).	KDM	\$525.00	4.20	\$2,205.00
06/07/2023	Conference with K. Murena and C. Murena regarding response to reservation of rights letter and draft complaint and follow up; review, revise response letter.	PB	\$400.00	1.80	\$720.00
06/08/2023	Draft and revise motion to dismiss introduction section	AP	\$325.00	0.70	\$227.50
06/08/2023	Telephone call with Melissa Vazquez to discuss homeowners requesting refunds on deposits for clubhouse rentals and discussion regarding homeowners delinquent on fees	AP	\$325.00	0.30	\$97.50
06/08/2023	Review and analyze information related to claim against Alfaro & Fernandez.	RML	\$525.00	0.20	\$105.00
06/08/2023	Review and revise complaint against Juregui.	RML	\$525.00	0.30	\$157.50

06/08/2023	Finalize Jauregui law draft complaint for fraudulent transfer and malpractice.	CP	\$275.00	1.50	\$412.50
06/08/2023	Further emails with Popular Bank regarding the Association's 2022 financial statements for purposes of quarterly review (.1); further emails with A. Pavon regarding her call with accountant investigating our Proof of Loss for the crime insurance claim and information to be provided to accountant in response to latest request, exchange emails with P. Baloyra regarding same, and provide further input regarding formal response (.4); emails with counsel for defendants in D&O action confirming agreement to transferring case to judge presiding over receivership action and confirming approval of the form of the proposed Order to send to chambers and review same (.2); email from E. Thompson forwarding draft Response to Motion to Strike portions of Receiver' Reply brief in initial appeal of Bankruptcy Court Orders from Ceperos bankruptcy case, review and revise same, and send to E. Thompson to finalize and file (1.6); discuss with A. Pavon her efforts to confirm maintenance fees that homeowners sent to former counsel for Association, whether their checks were cashed, and our efforts to obtain their funds from former counsel, and provide direction regarding further investigation of same and having homeowners cancel and reissue uncashed checks (.2); emails with M. Dhanji, FSR and homeowner regarding status of resolving issues related to her account and scheduling call to discuss (.1); emails with FSR regarding resolving issues related to other homeowners' accounts and requests for return of deposits for use of common areas (.1); emails with FSR regarding the Association's financial statements and the matters to be addressed during upcoming call and emails with forensic accountant regarding same (.2).	KDM	\$525.00	2.90	\$1,522.50
06/09/2023	Work on strategy related to pending litigation (0.3); work on issues related to Forensic Accountant (0.3); conference with Receiver regarding pending litigation and operational matters (1.0); call with Property Manager regarding overdue unit balances and budget matters (0.2); review and analyze data provided regarding same (0.2); email exchange with Property Manager and draft email to Receiver regarding same (0.1); review and analyze documents produced by Off Duty Services (0.1); work on damage analysis for various recovery claims (0.2).	RML	\$525.00	2.40	\$1,260.00
06/09/2023	Review and analysis of responses to subpoena from Off Duty Services and Raul Gonzalez-Cortina (.7); email exchange with K. Murena to discuss direction following receipt of same (.1); telephone call with Bryan Morera to discuss produced documents (.1).	AP	\$325.00	0.90	\$292.50
06/09/2023	Alfaro - Draft email to opposing counsel regarding appearance and motion to transfer (0.1); review and analyze letter from opposing counsel regarding settlement offer and work on related strategy (0.4).	RML	\$525.00	0.50	\$262.50

06/09/2023	Draft subpoena to Truist bank to obtain additional information needed by forensic accountants (.8); review of statements of Amerant, CIT, Popular, and Truist to determine missing information for forensic accountants (.5); email exchange with K. Murena to discuss direction on missing documents (.2).	AP	\$325.00	1.50	\$487.50
06/09/2023	Quinion - Review and revise motion to transfer.	RML	\$525.00	0.10	\$52.50
06/09/2023	Jauregui Law - Review and revise complaint (0.3); review and analyze document produced by various sources related to claim (0.4).	RML	\$525.00	0.70	\$367.50
06/09/2023	Reviewing status of all matters and email regarding same (.8); reviewing insurance response letters regarding crime policy (.8); telephone call with Receiver and co counsel regarding update on (.7); update on operational issues and responding to various operational e-mails (.5).	MME	\$550.00	2.80	\$1,540.00

06/09/2023	Review and revise letter responding to reservation of rights letter from counsel for crime insurance carrier and exchange emails with M. Damian and P. Baloyra regarding same and having Receiver approve (.5); emails with E. Thompson regarding revisions to letter, review revisions, work on finalizing letter and coordinate serving on carrier's counsel (.6); emails with P. Baloyra and M. Damian regarding second letter to carrier's counsel regarding the carrier's accountant's investigation of proof of loss, the requested documents and information provided, the delay in approving claim, and demand for same, review and make revisions to letter, exchange emails with E. Thompson regarding his revisions to same, work on finalizing letter, coordinate sending to carrier's counsel, and emails with Receiver regarding same (.8); emails with carrier's counsel regarding same and further discuss with team members (.1); further emails with FSR regarding addressing issues related to security deposits provided by homeowners and the financials of the Association (.2); email from counsel for security company providing response and production in response to Subpoena, review same, and exchange emails with team members regarding same (.2); emails with First Citizens Bank regarding account of Association and discuss with team members (.2); emails with Receiver and team members regarding the Response to the Ceperos Motion to Strike portions of Reply Brief in appeal of Bankruptcy Court's contempt orders and judgment (.1); emails with A. Pavon regarding documents produced by security company and its principal and telephone call with counsel for same regarding missing documents, and strategize regarding obtaining same and possible claims to recover payments from Association (.2); review Notices of Compliance with Subpoenas by security company and its principal and discuss with team members (.1); review email to Judge's chambers forwarding Agreed Motion to transfer D&O action to receivership judge and proposed Order granting same and discuss with team members same and related matters (.1); emails with A. Pavon regarding her efforts to obtain records from various banks needed by forensic accountant to complete reconstructions, assist with same, login to two banks to confirm statements available, review and approve supplemental subpoena to one bank, provide to A. Pavon subpoenas to and documents produced by other banks, and coordinate preparation of supplemental subpoenas (.7).	KDM	\$525.00	3.80	\$1,995.00
06/09/2023	Review and assess responsive documents from Off Duty Services of South FL responsive to subpoena.	CP	\$275.00	0.50	\$137.50
06/09/2023	Continue reviewing materials and drafting and revising letter to PIIC regarding delay in approval of claim; confer with K. Murena regarding same; respond to question regarding imputation and discovery of wrongdoing.	PB	\$400.00	3.80	\$1,520.00
06/10/2023	Alfaro - Work on claim strategy.	RML	\$525.00	0.10	\$52.50
06/11/2023	Review and begin revising detailed summary of investigation, negotiations, and resolution of wrongful death claims and related issues for purposes of the Receiver's next Status Report (.2).	KDM	\$525.00	0.20	\$105.00

06/12/2023	Call with Eric Thompson regarding Sarmina documents (0.1); call and exchange with P. Arcia regarding settlement checks and draft email to Property Manager regarding same (0.1); call with Receiver regarding litigation strategy and other operational matters (0.8); work on litigation strategy related to Alfaro & Fernandez (0.4); work on analysis for Receiver on warehouse expenditures (0.1); call with Forensic Accountant (0.3).	RML	\$525.00	1.80	\$945.00
06/12/2023	[Cepero] Review and analyze complaint, confer regarding background factual basis and work on litigation strategy (0.4); review and revise motion to dismiss or stay (0.2).	RML	\$525.00	0.60	\$315.00
06/12/2023	Meeting with Receiver regarding status of pending litigation.	MME	\$550.00	0.50	\$275.00
06/12/2023	Work on litigation strategy related to Hilton Napoleon.	RML	\$525.00	0.20	\$105.00
06/12/2023	Telephone calls with M. Damian and A. Pavon regarding the status of various matters related to the Association's vehicles and savings to the Association and provide direction regarding preparation of summary of same (.3); follow up with A. Pavon regarding having sold vehicles removed from Association's auto insurance policy and provide further input and information regarding same (.2); review Motion to Dismiss filed by former officers and directors in D&O action by Receiver and emails with M. Damian regarding preparation of response to same (.2 - reduced); email from the Court forwarding signed Order transferring D&O action to receivership judge and discuss with team members (.1); emails and discuss with R. Landy the Complaint filed by the Ceperos against the Association, various facts and procedural history related to bankruptcy case and appeals of bankruptcy court orders, and preparing Motion to stay state court action pursuant to Receivership Order and provide input regarding same (.3); prepare for call with forensic accountants and R. Landy regarding various matters, review certain documents provided by FSR (.2); attend call to discuss the financial statements prepared by FSR and the status of finalizing the accountant records and reconstruction of accounts for purposes of having them audited and for fraudulent transfer actions (.2).	KDM	\$525.00	1.50	\$787.50
06/12/2023	Work on motion to dismiss and stay.	il	\$150.00	1.20	\$180.00
06/13/2023	Cepero - Review and revise motion to dismiss.	RML	\$525.00	0.40	\$210.00
06/13/2023	Prepare subpoenas to First Bank, Banco Popular, and Amerant Bank.	AP	\$325.00	1.60	\$520.00
06/13/2023	Assess additional identified accounts and draft revised subpoena to Chase Bank regarding accounts controlled by M. Ghilardi and affiliates (.4); research condominium sold by H. Napoleon to K. Alzate (1.0); assess to do items: transfer complaint to vendors, subpoenas to banks, and settlement of attorney cases (.3).	CP	\$275.00	1.70	\$467.50
06/13/2023	Work on claims strategy related to H. Napoleon (0.3); review and revise subpoena to Chase Bank (0.1); work on claims against S. Juregui (0.2); work on subpoenas to various vendors (0.1).	RML	\$525.00	0.70	\$367.50

06/13/2023	[Reduce time] Draft memorandum to Judge Gersten outlining status of vehicles sold, to be sold, cancelled insurance, being repairs, and ultimate revenue to association (0.8); Communications with Carvana to provide information on 6 vehicles being offered for sale (1.0); telephone calls and email correspondences with B&B to remove eight vehicles from policy of insurance (.3); analysis on cars to be taken off insurance policy (.3).	AP	\$325.00	2.40	\$780.00
06/13/2023	Work with A. Pavon on obtaining bank records from First Citizens Bank/CIT Bank requested by forensic accountant for purposes of account reconstruction (.3); continue working with A. Pavon on confirming status of disposition of Association's vehicles and determining savings to the Association for the sale and removal from auto insurance policy and provide further direction regarding same (.3); email from A. Pavon forwarding detailed status report regarding vehicle sales and costs savings, review same, and prepare and send email to Receiver summarizing same (.4); further discuss with A. Pavon preparation supplemental subpoenas to certain banks, review and approve subpoenas to Amerant Bank and Popular Bank, and coordinate serving same on banks and counsel for the parties (.3).	KDM	\$525.00	1.30	\$682.50
06/13/2023	Receipt and review Defendants' Motion to Dismiss; discuss setting hearing on same with Melanie Damian.	TAC	\$525.00	0.70	\$367.50
06/13/2023	Review and analyze complaint and motion to dismiss complaint.	RKL	\$525.00	0.80	\$420.00
06/14/2023	[No charge] Email exchange with P. Baloyra to discuss information needed for adjuster in Claim No. 1546045 against board members (criminal ins.)	AP		0.10	\$0.00
06/14/2023	Telephone calls with representatives of First Bank and CIT Bank to obtain information on missing bank accounts needed to complete forensic accounting	AP	\$325.00	1.10	\$357.50
06/14/2023	Prepare subpoena to Santander Consumer USA, Inc. to find information on vehicle in Hammock's policy KL8CB6SA3MC228572	AP	\$325.00	0.80	\$260.00
06/14/2023	Email exchange with Melissa Vazquez to discuss authorized drivers under automobile policy (.1); email exchanges with Brown & Brown to discuss removal of stolen/sold vehicles from the policy and confirmation of savings association with same (.1); review of multiple documents provided by Brown & Brown on status of Association's policy (.2).	AP	\$325.00	0.40	\$130.00
06/14/2023	Assess additional entities in control of accounts and edit subpoenas (.4); work on additional subpoena issues (.4); correspondence with Galceran auto regarding impounded car (.2); assess emails and documents produced by A & F Management regarding role in fraud to inform complaint (1.5).	CP	\$275.00	2.50	\$687.50
06/14/2023	Review and revise subpoenas (0.2); email exchange regarding ACC panel (0.1).	RML	\$525.00	0.30	\$157.50
06/14/2023	[Alfaro] Call with Stephanie Demos (0.3); work on litigation strategy (0.1).	RML	\$525.00	0.40	\$210.00

06/14/2023	Further emails with Receiver regarding the status of the vehicle sales, the received and futures net sale proceeds, and the insurance premium savings and including same in the next Status Report, further discuss with team members, and coordinate following up with insurance broker regarding removing sold and stolen vehicles from policy and reducing premiums (.2); emails with insurance agent and A. Pavon regarding removing the sold and stolen vehicles from the policy, their values and assigned drivers, and reducing the premiums for the policy and review documents regarding same (.2); emails with P. Baloyra and A. Pavon regarding the crime policy carrier's accountant's latest requests for information and documents in support of claim against policy, the response sent to carrier's counsel, and further response to be made to accountant, and provide further input regarding same (.3); emails with team members regarding the Chapter 13 bankruptcy cases of certain homeowners and monitoring same and review recent court filings in one case (.2); work with intern and A. Pavon on confirming maintenance payments from various homeowners, reviewing materials provided by FSR, and preparing spreadsheet regarding same, and provide input regarding same (.3); emails with adjuster assigned to a personal injury claim against Association requesting various information and materials relevant to claim and exchange emails with A. Pavon regarding same, and provide documents and pictured gathered to date (.3); review emails with Ally Bank regarding the payoff letters needed for the sale of vehicles with liens to Carvana and related matters and further discuss with A. Pavon (.2); email from counsel for Cortland Partners producing documents requested in Subpoena, review same, and discuss with team members, and coordinate providing to insurance adjuster addressing personal injury claim (.3); review and approve Subpoenas to two banks for purposes of obtaining records necessary to complete reconstruction of accounts and discuss with team members (.2); emails with FSR regarding the RevoPay account activity in April and May 2023 and whether the account has been shut down, and send email to RevoPay requesting same (.2).	KDM	\$525.00	2.40	\$1,260.00
06/14/2023	Reviewing operational invoices on AVID, reviewing financials and email FSR regarding same.	MME	\$550.00	0.60	\$330.00
06/14/2023	[No charge] Review Ana Danton bankruptcy court file and pleadings (.3); email to and from K. Murena regarding same (.2).	rs		0.50	\$0.00
06/14/2023	Analyze Defendants' cited cases and research additional Florida case law on: (1) Florida law on failure to attach documents to or incorporate them in a complaint (1.1); and (2) failure to join an indispensable party and what constitutes an indispensable party (1.2); both in preparation for drafting response to motion to dismiss complaint.	RKL	\$525.00	2.30	\$1,207.50
06/15/2023	Communications with Carvana to provide additional documentation needed to move forward with sale of 4 vehicles	AP	\$325.00	0.60	\$195.00

06/15/2023	Telephone call and email exchange with Melissa Vazquez to discuss information needed on Paul and Vivian Glazer matter (.2); review of materials in Paul and Vivian Glazer matter in anticipation, including photographs and notice letter from claimants (.3); email exchange with Melissa Vazquez regarding tag renewals (.1).	AP	\$325.00	0.60	\$195.00
06/15/2023	Prepare and analysis of invoices provided in response to subpoena to Raul H. Gonzalez and Off Duty Services (.8); email correspondence with K. Murena and R. Landy summarizing findings and potential lawsuit against same (.3).	AP	\$325.00	1.10	\$357.50
06/15/2023	Draft subpoenas to several banks regarding accounts of entities who were vendors to the Hammocks.	CP	\$275.00	1.10	\$302.50
06/15/2023	Email exchange with Ally Bank regarding 10-day pay off letters.	AP	\$325.00	0.10	\$32.50
06/15/2023	Email exchange with multiple homeowners claiming discrepancies in fees as a result of mailing checks to third-parties (.3); review of ledgers provided by the Hammocks to determine outstanding balances in fee discrepancies case (.3); email exchange with Melissa Vazquez to obtain contact information on homeowners claiming deposits for clubhouse rentals were not timely returned (.2).	AP	\$325.00	0.80	\$260.00
06/15/2023	Calls with Navitas regarding workout of payments (0.7); call with Eric Thomson (0.1).	RML	\$525.00	0.80	\$420.00
06/15/2023	Review and analyze return of service on Hilton Napoelon.	RML	\$525.00	0.10	\$52.50
06/15/2023	[Alfaro] Email exchange with opposing counsel regarding settlement negotiations.	RML	\$525.00	0.10	\$52.50
06/15/2023	Emails with Ally Bank and A. Pavon regarding the payoff letters for the sale of the five vehicles on which the Bank has liens and the timing of same and further discuss with A. Pavon (.2); review letter from counsel for Alfaro & Fernandez making settlement offer and exchange emails with R. Landy regarding same and additional information and funds from homeowners to obtain from the firm (.2); emails with A. Pavon regarding documents produced by security company and its principal reflecting amounts paid by Association and the Association's claims against same, review documents, and strategize regarding same (.3); emails with L. Diaz regarding service of supplemental subpoenas on two banks and follow up on same (.1); review Initial Brief in the Ceperos' appeal of Bankruptcy Court's Order denying motion for attorneys' fees, emails with team members regarding same and deadline to file Answer Brief, and send email to Receiver and E. Thompson forwarding same and noting deadline (.4).	KDM	\$525.00	1.20	\$630.00
06/15/2023	Reviewing legal research on claims against nonprofit board and pleading requirement in response to Motion to Dismiss D & O complaint and discuss same with co-counsel.	MME	\$550.00	0.80	\$440.00
06/15/2023	Call with Carvana customer service to approve the lien letter for the sale of cars for Hammocks.	il	\$150.00	2.00	\$300.00

06/15/2023	[No charge] [Cepero Bankruptcy] Research on appellate deadlines; email to K. Murena regarding same.	rs		0.20	\$0.00
06/15/2023	Analyze Defendants' cited cases and research additional Florida case law on: (1) standards for ruling on a motion to dismiss (.8); and (2) alleging breach of fiduciary duty against homeowners' association officers and directors (1.5); both in preparation for drafting response to motion to dismiss complaint.	RKL	\$525.00	2.30	\$1,207.50
06/16/2023	Draft letter of explanation to Carvana regarding 10-day pay-off letters.	AP	\$325.00	0.80	\$260.00
06/16/2023	Draft subpoenas to several vendors (1.1); finalize several subpoenas to additional vendors (.5); work on drafting fraudulent transfer complaint to multiple vendors (1.3).	CP	\$275.00	2.90	\$797.50
06/16/2023	Call from Navitas regarding workout of Playground contract (0.3); work on subpoenas to vendors' banks (0.2).	RML	\$525.00	0.50	\$262.50
06/16/2023	Telephone call with M. Vazquez to discuss outstanding association issues.	AP	\$325.00	0.30	\$97.50
06/16/2023	Prepare a letter of explanation letter to Carvana regarding the status Hammocks being in a receivership following denial of sale.	AP	\$325.00	0.80	\$260.00
06/16/2023	Review of subpoena response from Cortland partners to determine liability of the Hammocks in claim.	AP	\$325.00	0.40	\$130.00
06/16/2023	Call with Carvana and Ally Bank customer service to approve the lien letter for the sale of cars for Hammocks.	il	\$150.00	2.00	\$300.00
06/16/2023	Discuss with A. Pavon preparation of record on appeal for the Ceperos' appeal of Bankruptcy Court's denial of motion for attorneys' fees and deadline to file same, and provide direction regarding preparation (.3); review invoice from First Insurance regarding the invoice for the next premium payment for two insurance policies and coordinate payment of same (.1); review Chapter 13 Trustee's Notice of Delinquency in Confirmed Chapter 13 Plan Payments and discuss with team members same and effect on Association (.2); email from Ally Bank forwarding updated payoff letters for vehicles to be sold, review same, and discuss with team members (.2); emails with Receiver and E. Thompson regarding the Initial Brief in the Ceperos' appeal of Bankruptcy Court's Order denying motion for attorneys' fees and the deadline to file Answer Brief and further discuss with team members (.2); emails with L. Diaz regarding service of Subpoenas on two additional banks and discuss with team members same, response deadline, and related matters (.2).	KDM	\$525.00	1.20	\$630.00
06/16/2023	Additional research on law on alleging breach of fiduciary duty against homeowners' association officers and directors and draft email of results to Melanie Damian.	RKL	\$525.00	0.80	\$420.00
06/19/2023	Email exchange with adjuster Dennis Broderick to provide additional information regarding Glazer claim (.2); perform research on 10816 SW 147th street on miami-dade property appraisal website (.1); perform research on claimant Vivian Glazer aka Vivian Flio (.2).	AP	\$325.00	0.50	\$162.50

06/19/2023	[Cepero] Draft Receiver's Designation to be included in the Record and Issues on Third Appeal and review of docket for preparation of same.	AP	\$325.00	1.60	\$520.00
06/19/2023	Jauregui - Review and revise Jauregui complaint (0.4); review and analyze documents related to same (0.5); review and analyze insurance certification and policy from Florida Lawyers Mutual Insurance Company (0.2); confer with Receiver regarding litigation strategy (0.1); work on litigation strategy (0.2).	RML	\$525.00	1.40	\$735.00
06/19/2023	Rasco Klock - Review and analyze documents supporting claim (0.8); work on litigation strategy (0.2).	RML	\$525.00	1.00	\$525.00
06/19/2023	Communications with Carvana to determine status of sale of 2022 Toyota Tacomas.	AP	\$325.00	0.30	\$97.50
06/19/2023	Email exchanges with Everest Insurance regarding adding/removing drivers B. Santovenia and D. Baptista.	AP	\$325.00	0.10	\$32.50
06/19/2023	Call from Tryson Ward regarding Navitas Credit and playgrounds equipment (0.1); call with Dan Wen regarding Leaf equipment matter (0.2); review and analyze emails and documents from Ms. Ginarte and draft email to ACC panel regarding same (0.3); email exchange regarding Ginarte ACC application and draft email to Receiver regarding same (0.2); review and analyze meeting minutes from 2015 related to SCL law group (0.2).	RML	\$525.00	1.00	\$525.00
06/19/2023	Email exchanges with Carmen Grullon regarding association fees with review of multiple provided documentation (.6); email exchange with Melissa Vazquez to request missing homeowners' information (.1); review of 10544 SW ledger (.1)	AP	\$325.00	0.80	\$260.00
06/19/2023	Telephone call with Melissa Vazquez regarding A. Casiano complaint.	AP	\$325.00	0.20	\$65.00
06/19/2023	[Cepero] Review and revise motion to dismiss and work on litigation strategy.	RML	\$525.00	0.20	\$105.00
06/19/2023	Meet and conference regarding the status of several projects (.1); review subpoenas and notices to vendor's banks prior to service (.3); continue draft of fraudulent transfer and aiding/abetting complaint (5.4); assess file and locate discovery sent by H. Napoleon responsive to subpoena (.2); review additional transfers from several additional entities (.2); review Jauregui law insurance policy information (.2); review several emails from Jauregui Law to other Association attorneys (.2).	CP	\$275.00	1.20	\$330.00

06/19/2023	Email exchange with Carmen Grullon regarding additional information needed and review of additional documents provided (.1); email exchange with K. Veilleux to address deposit refund and review of documents in preparation of same (.1); email exchange with J. Cueva to address deposit refund and review of documents in preparation of same (.1); email exchange with L. Randave to address deposit refund and review of documents in preparation of same (.1); email exchange with L. Luna to address deposit refund and review of documents in preparation of same (.1); email exchange with J. Rosada to address deposit refund and review of documents in preparation of same (.1); email exchange with F. Cespedes to address deposit refund and review of documents in preparation of same (.1); email exchange with M. Vazquez to discuss various outstanding items (.1); telephone call with J. Cueva to discuss information needed for return of deposit (.1)	AP	\$325.00	0.90	\$292.50
06/19/2023	Review the Ceperos's Motion to transfer appeal of Order denying motion for attorneys' fees to District Judge presiding over appeal of prior two appeals and exchange emails with team members regarding same (.2); review responses to requests of insurance adjuster assigned to personal injury claim asserted against Association, email from A. Pavon regarding same, and strategize regarding same and further information to confirm and provide to adjuster (.3); review 4 additional Subpoenas to banks and discuss with team members (.2).	KDM	\$525.00	0.70	\$367.50
06/19/2023	Begin drafting response to motion to dismiss, D&O complaint.	RKL	\$525.00	2.40	\$1,260.00
06/20/2023	Review of Alfaro & Fernandez file to determine 10544 SW 161 PL fee deposits.	AP	\$325.00	1.10	\$357.50
06/20/2023	Communications with Carvana representative to discuss 2022 Toyota Tacoma Sales (.3); email exchange with dispute department of Carvana (.3).	AP	\$325.00	0.60	\$195.00
06/20/2023	Review and analyze email from M. Ginarte and draft response (0.1); work on recovery claims strategy (0.2); review and analyze payments to questioned vendors (0.4); review and analyze emails regarding ACC applications (0.1).	RML	\$525.00	0.80	\$420.00
06/20/2023	Alfaro - Email exchange with claims adjuster.	RML	\$525.00	0.10	\$52.50
06/20/2023	Email exchange with Brown & Brown to discuss cancellation of vehicle policies	AP	\$325.00	0.10	\$32.50
06/20/2023	Email exchange with Eric Thompson requiring third appeal designation.	AP	\$325.00	0.10	\$32.50
06/20/2023	Klock - Review and analyze Napoleon documents and email exchange with opposing counsel.	RML	\$525.00	0.40	\$210.00
06/20/2023	Review and assess more emails from A & F Management regarding role in collections scheme (2.5); continue drafting complaint against several vendors for fraudulent transfer (1.7).	CP	\$275.00	4.20	\$1,155.00
06/20/2023	Reviewing cash flow and projections and approving operational invoices.	MME	\$550.00	0.60	\$330.00

06/20/2023	Review and analyze payments to questioned vendors (0.1); review and analyze agreement with Sport Surfaces (0.1); email exchange with Receiver regarding ACC applications (0.2).	RML	\$525.00	0.40	\$210.00
06/20/2023	Emails with A. Pavon regarding the draft Designation of the Record and Issues on Appeal for purposes of Ceperos's appeal of Bankruptcy Court's Order denying request for attorneys' fees, review same, and coordinate making further revisions and having E. Thompson review and approve (.4); review emails with E. Thompson and A. Pavon regarding same and coordinate finalizing same (.2); review affidavits of service of Subpoenas on 4 banks and discuss with team members (.1); email and letter from Santander Bank regarding our Subpoena and require fee for production of responsive documents, discuss with team members, and coordinate payment of fee (.2); email from A. Pavon regarding issue with sale of encumbered vehicles to Carvana and provide input regarding resolving issue (.2); email from A. Pavon regarding her investigation of account of homeowner, her payments to prior counsel for Association, fees assessed against her, and recommendation regarding adjustment of account, and coordinate having Receiver approve recommended adjustment (.2); emails with FSR regarding obtaining updated accounting of homeowner payments from RevoPay and follow up with RevoPay regarding same (.1).	KDM	\$525.00	1.40	\$735.00
06/20/2023	Continue drafting response to motion to dismiss in D&O matter.	RKL	\$525.00	1.80	\$945.00
06/20/2023	[No charge] Review checks and invoices as evidence of transfer for to the shell corporations.	il		4.00	\$0.00
06/21/2023	Search and compile Compu Fix and Worldwide Solutions invoices and checks for State Attorney (1.4); meet and confer regarding payments to various vendors (.2); work on invoice and payment sourcing issues (.4); assess payments made to Sport Courts LLC regarding payment of deposit (.5); assess status of service of process of several criminal attorneys (.1).	CP	\$275.00	2.60	\$715.00
06/21/2023	Reviewing financials (.4); reviewing and approving operational invoices in AVID (.3); discuss complaint against professional with R. Landy (.2).	MME	\$550.00	0.90	\$495.00
06/21/2023	(No Charge) Working on interim fee application.	MME		1.00	\$0.00
06/21/2023	Complete ACC application decision form for Ginarte and draft email to Receiver regarding same.	RML	\$525.00	0.20	\$105.00
06/21/2023	Jauregui - Work on claim strategy.	RML	\$525.00	0.10	\$52.50
06/21/2023	Work on fraudulent transfer claims (0.2); call from Elite Guard (0.2); call with Sport Surfaces regarding resolution of transfer related to tennis courts (0.3).	RML	\$525.00	0.70	\$367.50
06/21/2023	A&F - Prepare for (0.1); and conduct call with S. Snells regarding settlement negotiations (0.2).	RML	\$525.00	0.30	\$157.50

06/21/2023	Further emails with team members regarding finalizing and filing Designation of the Record and Issues on Appeal, receive confirmation of same, and confirm the portions of the record designated and attached to filed Notice of same (.2); review Ceperos's Amended Designation of Record and Issues on Appeal and exchange emails with team members regarding same (.2); review Order staying briefing schedule for the Receiver's appeal of Bankruptcy Court's denial of Rule 60 Motion pending resolution of initial appeal of contempt orders and discuss with team members same and effect on other appeals (.2).	KDM	\$525.00	0.60	\$315.00
06/21/2023	Revising response to motion to dismiss.	RKL	\$525.00	3.00	\$1,575.00
06/22/2023	Reviewing pending issues and telephone update with Receiver regarding same (.5); reviewing and revising response to Motion to Dismiss in D&O and providing same to Receiver (1.2); emails regarding playground mulch, potential violation and approval of remedial work (.4).	MME	\$550.00	2.10	\$1,155.00
06/22/2023	Emails with team members regarding recent filings in the appeals from the Bankruptcy Court's orders in the Ceperos's bankruptcy case, including motion to transfer third appeal on attorneys' fees and designation of record and issues in that appeal, and confirm all deadlines and status of transfer of appeal (.1); emails with A. Pavon regarding issues with selling certain encumbered vehicles to Carvana and confirming that they remain on Association's insurance policy and provide further input regarding same (.2); review letter from Capital One responding to Subpoena and discuss with team members (.1); emails with team members regarding communications with JP Morgan Chase regarding Subpoena and coordinate following up on Subpoenas to other banks (.1).	KDM	\$525.00	0.50	\$262.50
06/22/2023	Work on bank subpoena issues (.2); call with Chase subpoena officer regarding request (.1).	CP	\$275.00	0.30	\$82.50
06/23/2023	Work on Worldwide Business Solution checks issue (.2); multiple correspondence with Regions Bank subpoena processing regarding subpoena scope (.3); work on bank subpoenas (.3); assess correspondence from forensic accountant regarding vendor payments (.1); assess transfers to security service regarding forensic accountant details and subpoena responses (.3); review finalized complaint to Jauregui Law (.3); call with Chase Bank regarding subpoena responses (.2); review updated vendor transfer summary (.2); review transactions from R. Gonzalez regarding adding party to complaint (.4).	CP	\$275.00	2.30	\$632.50
06/23/2023	Review and analyze payments to certain vendors for fraudulent transfer claims (0.1); work on resolution of fitness and playground and tennis contracts (0.2); review and analyze responses to subpoenas from various banks (0.1); confer with forensic accountant (0.2); work on matter related to unit owner payments not provided by Alfaro & Fernandez (0.3).	RML	\$525.00	0.90	\$472.50
06/23/2023	Alfaro - Review and analyze analysis of information related to receipt of payment of unit owner funds.	RML	\$525.00	0.10	\$52.50

06/23/2023	Jaurigui - Call with Receiver regarding litigation strategy (0.2); work on completing complaint (0.2).	RML	\$525.00	0.40	\$210.00
06/23/2023	Further emails with RevoPay regarding the April and May account activity and the status of closing the Association's account and discuss with team members (.2); further emails with R. Landy and A. Pavon regarding investigation of homeowner's account, payment history, payments to Association's former counsel, and request to waive fees assessed on account and provide further input regarding same (.2); discuss with A. Pavon issues related to sale of vehicles to Carvana and resolution of same and provide direction regarding same including preparation power of attorney for Receiver and contacting Carvana's legal department (.2); discuss with A. Pavon regarding insurance on certain vehicles and provide direction regarding same (.1); further discuss with A. Pavon status of confirming outstanding balances of accounts of various homeowners and records still needed from Association's former counsel and provide input regarding same (.1); provide input to A. Pavon regarding preparation of fraudulent transfer and unjust enrichment claims against former security company and its principal and emails with A. Pavon and C. Perse regarding same (.2); review Opinion and Order on appeal of Bankruptcy Court's Contempt and Punitive Damages Orders and Judgment, reversing punitive damages award and remanding to Bankruptcy Court, emails with M. Damian and E. Thompson regarding same, emails with E. Thompson and Receiver to schedule call to further discuss, and strategize regarding same (1.1).	KDM	\$525.00	2.10	\$1,102.50
06/23/2023	Various e-mails with FSR regarding operations (.3); telephone update with Receiver (.2).	MME	\$550.00	0.50	\$275.00
06/23/2023	[No charge] Review final opinion and order in first appeal (.2); emails to and from K. Murena regarding same (.1).	rs		0.30	\$0.00
06/25/2023	Review and analyze documents related to Deco Enterprises and review and response to email from Chief Tamayo regarding same (0.3); review and analyze emails regarding ACC panel and draft responses (0.2); review and analyze email from Property Manager regarding pending litigation and draft response (0.2).	RML	\$525.00	0.70	\$367.50
06/26/2023	Receipt of correspondence from Capital One regarding subpoena issued for vehicle information.	AP	\$325.00	0.10	\$32.50
06/26/2023	[No charge] Review of court order remanding case to bankruptcy court.	AP		0.50	\$0.00
06/26/2023	Email exchange with Judge Gersten regarding the waiver of fees for 10544 SW 161 PL (.4); email exchange with J. Cuerva regarding additional information needed for deposit (.1); email exchange with J. Jomarron to discuss 15581 SW 112 Drive (.1); meeting with R. Landy to discuss 15581 SW 112 Drive and reimbursement (.2).	AP	\$325.00	0.80	\$260.00
06/26/2023	Email exchange and preparation of summary of reimbursement for J. Cueva; preparation of multiple documents to provide to K. Murena.	AP	\$325.00	0.50	\$162.50
06/26/2023	Appeal Cepero - Review of docket to determine status of transfer.	AP	\$325.00	0.10	\$32.50

06/26/2023	Telephone calls and email with Carvana dispute department to discuss the validity of a POA for the sale of vehicles on Judge Gersten's behalf.	AP	\$325.00	0.50	\$162.50
06/26/2023	Herminda - Call from Rick Hermida and email exchange regarding response to complaint (0.2); review and analyze email from E. Thompson regarding certain lien release, search Association records, and draft response (0.2).	RML	\$525.00	0.40	\$210.00
06/26/2023	Work on ACC applications (0.3); receive information related to subpoena to excellent service works and information provided by counsel (0.2) call from Chase regarding subpoena for account records of Excellent service works (0.2); review and analyze email from M. Ginarte and draft response (0.1); review and analyze email from Tryson Ward regarding resolution of equipment financing agreement and draft response (0.1).	RML	\$525.00	0.90	\$472.50
06/26/2023	Jauregui- Draft email to S. Jauregui regarding complaint and work on litigation strategy (0.2); review and revise letter to carrier (0.2).	RML	\$525.00	0.40	\$210.00
06/26/2023	Alfaro & Fernandez - Work on claims support.	RML	\$525.00	0.20	\$105.00

06/26/2023	Review Notice of Status Conference in Bankruptcy Court to discuss Opinion and Order from District Court on the Association's appeal from Ceperos Bankruptcy Case, discuss with team members, coordinate arranging for Zoom appearance, provide input regarding same, and receive confirmation of same (.2); discuss with A. Pavon the status of the appeal by the Ceperos on the Bankruptcy Court's order denying fee request and whether it will be dismissed given Opinion in other appeal, review docket, and emails with A. Pavon regarding same and related issues (.2); prepare for call with Receiver and E. Thompson regarding the District Court's Order reversing in part and remanding Bankruptcy Court's Orders and Judgment (.2); attend call with Receiver and E. Thompson to discuss same, strategy for upcoming Status Conference in Bankruptcy Court to discuss District Court's Order and further proceedings and amended rulings, and possible arguments to make to Bankruptcy Court regarding same (.5); strategize with M. Damian regarding the foregoing (.1); review Motion for Reconsideration of Opinion and Order and strategize with team members regarding same (.5); emails with E. Thompson regarding the Motion and whether response is permitted and review applicable Rule (.2); emails with A. Pavon and Receiver regarding request by homeowner for waiver of certain fees and penalties and the status of her account and provide further input to A. Pavon regarding resolving issues (.2); work with M. Dhanji on gathering information for purposes of Receiver's upcoming meeting with homeowners and send email to Receiver providing information (.2); emails with A. Pavon and Carvana regarding issues with sale of certain vehicles and power of attorney of Receiver and further discuss same with A. Pavon (.2); emails from Amerant Bank providing production in response to Subpoena and invoice for same, download and coordinate organizing production and sending to forensic accountant for purposes of account reconstruction, and coordinate payment of invoice (.3); emails with A. Pavon regarding homeowners' requests for return of security deposit for reserving common areas for events that were cancelled, review documents provided by homeowners in support of requests, and provide direction to A. Pavon regarding responding to requests (.2).	KDM	\$525.00	3.00	\$1,575.00
06/26/2023	Telephone conference with Mycki Ratzan regarding subpoena to her client Jose Gonzalez; discuss same with Melanie Damian and Russell Landy.	TAC	\$525.00	0.70	\$367.50
06/26/2023	[No charge] Review notice from court regarding status conference on final opinion and order issued in the first appeal (.2); register K. Murena and Receiver for conference (.2); emails to and from K. Murena and receiver regarding same (.1).	rs		0.50	\$0.00

06/27/2023	Email exchange and telephone call with Melissa Vazquez regarding reimbursement of funds to J. Cueva (.3); open dispute with Sunpass regarding toll charges in name of Associaton (.2); email exchange with Detective Polo to advise of new information on stolen vehicles (.1); telephone call with J. Cespedes regarding reimbursement of deposit (.1); email exchange with K. Veilleux regarding reimbursement of deposit (.1); Email exchange with L. Luna regarding reimbursement of deposit (.1).	AP	\$275.00	0.90	\$247.50
06/27/2023	Review and analyze email from T. Ward.	RML	\$525.00	0.10	\$52.50
06/27/2023	Review of subpoena responses from Amerant Bank and prepare same for turnover to forensic accountant (.5); email exchange with S. Banez regarding Amerant Bank statements (.1).	AP	\$325.00	0.60	\$195.00
06/27/2023	Call with Chase Bank subpoena department regarding additional Albri Consulting accounts (.2); call with Chase Bank regarding subpoena for Excellent Work and Services accounts (.2); correspondence with Regions Bank regarding response to subpoena (.1); revise letter to insurance carrier (.2).	CP	\$275.00	0.70	\$192.50
06/27/2023	Appeal Cepero - Email exchanges with M. Brooks regarding misfiling of case (.2); telephone call with M. Brooks' office regarding third appeal (.2)	AP	\$325.00	0.40	\$130.00
06/27/2023	Call with Property Manager regarding equipment loan matter (0.2); email exchange with E. Thompson regarding lien release matter (0.1).	RML	\$525.00	0.30	\$157.50
06/27/2023	Meeting with Receiver regarding PPP issue and pending litigation.	MME	\$550.00	0.30	\$165.00
06/27/2023	Review draft Response to Motion to Dismiss, insurance policy and Florida Statute 617.0834; discuss same with Melanie Damian related to demand on D&O carrier.	TAC	\$525.00	0.80	\$420.00

06/27/2023	Review email from Carvana cancelling pending sales of vehicles and discuss with A. Pavon same and selling the remaining vehicles to AutoNation and provide input regarding same (.2); further emails with Receiver regarding information to provide to homeowners related to the Receivership and discuss with team members (.1); further emails with A. Pavon regarding returning security deposit for space that was never rented by homeowner and review emails with FSR regarding same and related matters (.2); emails with A. Pavon and M. Dhanji regarding a homeowners payments to a PO Box in Miami and investigating the account to which the funds were supposedly deposited and strategize regarding same (.2); discuss with A. Pavon notifying counsel for the Ceperos that emails that they filed Motion to transfer third appeal in the wrong case and review the Motion to transfer once filed in correct case (.2); work with team members on following up with various banks to obtain records needed to complete forensic reconstruction of accounts and provide further direction regarding same (.4); log in to Truist Bank account to confirm deposits into accounts and whether assessed fees have been credited back to account and discuss with team members (.2); strategize with team members regarding claim against crime policy and following up on letters to the insurance carrier's counsel and accountant investigating claim, review arguments and documents presented to counsel for accountant, and coordinate following up on claims and issues raised in letters (.4).	KDM	\$525.00	1.90	\$997.50
06/28/2023	Email exchange with Gaby from Opposing Counsels office to discuss Motion to Transfer Third Appeal (.1); telephone call with J. Cueva regarding deposit return (.1); telephone call with L. Menendez regarding discrepancy on ledger (.1); research into multiple homeowners sending fees to an unknown bank account held at Veritex Community Bank (.5).	AP	\$325.00	0.80	\$260.00
06/28/2023	Email exchange with Detective Polo to provide details on vehicles with unknown liens (.1); email exchange with Capital One to obtain status on issued subpoena (.1).	AP	\$325.00	0.20	\$65.00
06/28/2023	Assess responses to subpoenas and follow-up regarding same.	CP	\$275.00	0.30	\$82.50
06/28/2023	Review and revise demand letter to Shannon L. Zetrouer, Esq. (0.1); review and analyze information regarding possible new Hammocks bank account (0.1).	RML	\$525.00	0.20	\$105.00
06/28/2023	Review and analyze documents related to Napoleon's actions on behalf of Association (0.3); review and analyze email from opposing counsel and draft response (0.1).	RML	\$525.00	0.40	\$210.00

06/28/2023	Emails with RevoPay providing account activity in April and May and confirming account was closed, review account activity, and exchange emails with FSR regarding same (.3); emails with FSR regarding returning deposits to certain homeowners and further discuss with team members (.2); discuss with team members the effect of the Opinion and Order in the first Ceperos appeal on the other two appeals and provide input regarding same (.2); discuss with A. Pavon issues related to Receiver's claim against crime policy, correspondence exchanged with insurance carrier's attorney and accountant investigating proof of loss, her communications with accountant, and related matters, and coordinate following up with attorney and accountant regarding issues addressed in correspondence (.3); emails with A. Pavon regarding an account to which certain homeowner's maintenance fees were being deposited and the address to which they were sending payments and provide input regarding investigation of account and responding to homeowner's inquiries regarding same (.2).	KDM	\$525.00	1.20	\$630.00
06/28/2023	Reviewing operational invoices in AVID and approving, e-mails regarding same and reviewing cash reports.	MME	\$550.00	0.70	\$385.00
06/28/2023	[No charge] Review order on stay in second appeal (.2); email to and from K. Murena regarding same (.1).	rs		0.30	\$0.00
06/28/2023	Draft demand letter.	il	\$150.00	0.70	\$105.00
06/29/2023	Draft subpoena to Veritex Community Bank (.5); email exchanges with Melissa Vazquez to discuss updates on ledgers (.2).	AP	\$325.00	0.70	\$227.50
06/29/2023	Email exchange with auto nation regarding potential sale of vehicles (.1); email exchange with Brown & Brown regarding putting vehicles in policy (.1)	AP	\$325.00	0.20	\$65.00
06/29/2023	Draft email to Sport Surfaces regarding return of funds and work on related strategy (0.2); review and analyze emails regarding ACC application matters and draft email response (0.3).	RML	\$525.00	0.50	\$262.50
06/29/2023	[Rasco] Review and analyze email from counsel for Napoleon and draft response.	RML	\$525.00	0.10	\$52.50

06/29/2023	<p>Emails with A. Pavon regarding Subpoena to another bank to which homeowners' fees were being deposited, review and approve same, and coordinate service on bank and Plaintiff's counsel (.2); emails with insurance carrier's counsel and A. Pavon regarding carrier's consideration of our responses to their reservation of rights letter and request for additional information already provided in support of proof of loss and provide further direction regarding further communications with counsel (.2); emails with team members and E. Thompson regarding the preparation of Answer Brief in Ceperos's appeal of Bankruptcy Court's denial of attorneys' fees motion, the deadline to file same, and the status of the District Court's ruling on Motion to transfer case to judge presiding over other two appeals (.2); emails with A. Pavon and M. Dhanji regarding recent communications with homeowner regarding her request for credit to her account and related matters and discuss with team members further communications with homeowner and the status of resolving issue (.2); review invoice from Amerant Bank for purposes of production in response to Subpoena, coordinate payment of same, discuss with team members timing of production and the status of responses from other banks, and coordinate following up on same (.2); emails with insurance broker and A. Pavon regarding adding five vehicles to insurance policy because their sales to Carvana were cancelled and further discuss with team members same and status of efforts to sell vehicles (.2); emails with A. Pavon regarding further communications with the accountant investigating the Receiver's proof of loss in support of claim against Crime Policy and provide further input regarding same (.2).</p>	KDM	\$525.00	1.40	\$735.00
06/29/2023	[No charge] Review court file (.3); emails to and from K. Murena regarding third appeal and answer to initial brief (.2).	rs		0.50	\$0.00
06/30/2023	Review of documents provided by N. Arriaga (.1); email exchange with Ally Bank regarding status of sale (.1); review of documents provided by M. Vazquez for R. Paz, F. Forero, F. Patino, and J. Fernandez (.3)	AP	\$325.00	0.50	\$162.50
06/30/2023	Email exchanges with Auto Nation and Carmax to obtain quotes for vehicles to be sold (.2); obtain quotes online for vehicles to be sold (0.8); correspondence with M. Vazquez regarding instruction on vehicles (.2).	AP	\$325.00	1.20	\$390.00
06/30/2023	[No charge] Assess upcoming depositions and subpoena responses.	CP		0.20	\$0.00

06/30/2023	Emails with team members regarding service of supplemental Subpoena on CIT Bank for purposes of completing forensic reconstructions, review email from process server, and coordinate following up with CIT Bank (.2); emails with Ally Bank and A. Pavon regarding the status of selling the vehicles on which the Bank has liens and related matters and provide further input regarding same (.2); emails and discuss with L. Diaz finalizing and serving Subpoena on another bank, review and approve same, provide further input regarding serving the parties, and review emails with bank and the parties regarding same (.3); review Order denying the Ceperos's Motion to transfer third appeal to judge presiding over first two appeals and discuss with team members (.1); emails with Capital One regarding production in response to Subpoena, work on accessing production through secure legal document portal, exchange emails with A. Pavon regarding same, and coordinate contacting subpoena department regarding same (.3); follow up on status of obtaining documents from other banks in response to Subpoenas and receive update regarding same (.1).	KDM	\$525.00	1.20	\$630.00
06/30/2023	Work on subpoenas to third parties and strategy related to same (0.1); email exchange with E. Thompson regarding Zetrauer attorney release and review and analyze related documents (0.1); call with counsel for Leaf regarding loan resolution (0.2); review and analyze email from Leaf's counsel and draft email to client regarding same (0.2).	RML	\$525.00	0.60	\$315.00
06/30/2023	[Alfaro] Call with opposing counsel regarding settlement negotiations (0.2); work on strategy and draft email to client regarding same (0.1).	RML	\$525.00	0.30	\$157.50
06/30/2023	Reviewing and executing certain work orders.	MME	\$550.00	0.40	\$220.00
06/30/2023	Work on documents regarding architectural application decisions for the HOA to provide analysis to R. Landy.	il	\$150.00	1.50	\$225.00
				279.20	\$108,835.00

Costs & Expenses

Date	Description	Amount
05/12/2023	Postage	\$9.72
05/13/2023	FEDEX. Invoice 39726. Florida Lawyers Mutual Insurance. 5.13.23	\$28.82
05/15/2023	Extra Space Storage. Unit 1036. 05.15.23	\$428.41
05/16/2023	FEDEX. Invoice 39726. Adam Ruff. Gordon Rees Scully Mansukhani. 05.16.23	\$20.15
05/16/2023	Miami Dade County Parking - Lot #25 Parking. 05.16.23	\$15.00
05/21/2023	Extra Space Storage. Unit 4003. Storage. 05.26.23	\$545.17
05/23/2023	DLE Process Servers. Invoice 2023022858. Subpoena to be served on Capital One Financial Corp. c/o Capital One Attn 12070-7000. Additional Address. 05.23.23	\$210.00
05/30/2023	Filing Fee: Summons for Rasco Klock Perez Nieto PL	\$35.00
05/31/2023	Pacer/ Court Documents	\$58.20
05/31/2023	Lexis Nexis Advance Legal Research Fee	\$78.57
05/31/2023	Photocopies	\$23.58

05/31/2023	Photocopies	\$130.32
06/02/2023	DLE Process Servers. Invoice 2023025379. Subpoena to be served on Capital One Auto Financial. 06.02.23	\$105.00
06/06/2023	Postage	\$8.58
06/07/2023	Clerk of Courts Miami Dade County. Filing Complaint. Herminda Law Firm LLC, Quintero Broche, P.A., And Jose M. Quinon, P.A. 06.07.23	\$406.00
06/09/2023	Clerk of Courts Miami Dade County. Efiling Summons, Herminda Law Firm, Summmons Quintero Broche, Summons Jose M. Quinon. P.A.. 06.09.23	\$30.00
06/14/2023	DLE Process Servers. Invoice 2023026168. Summons to be served on Hilton Napoleon II. Additional Address. 06.14.23	\$90.00
06/14/2023	DLE Process Servers. Invoice 2023026167. Summons to be served on Hilton Napoleon II P.A. Additional Address. 06.14.23	\$90.00
06/15/2023	DLE Process Servers. Invoice 2023027618. Subpoena to be served on Amerant Bank, N.A RA: Marshall S. Martin. 06.15.23	\$35.00
06/15/2023	DLE Process Servers Inc. Invoice 2023027619. Subpoena to be served on Popular Bank RA: Israel Velasco. 06.15.23	\$35.00
06/15/2023	ExtraSpace Storage - Unit # 1036. 06.15.23	\$428.11
06/16/2023	DLE Process Servers. Invoice 2023028039. Subpoena to be served on Records Custodian JP Morgan Chase Bank. N.A c/o CT Corporation System. 06.16.23	\$35.00
06/16/2023	DLE Process Servers. Invoice 2023027942. Subpoena to be served on Santander Consumer USA, Inc c/o CT Corporation Ssystem. 06.16.23	\$35.00
06/19/2023	Postage	\$0.60
06/20/2023	Santander Cosumer USA Inc. Produce Records in response to subpoena. 06.20.23	\$25.00
06/20/2023	DLE Process Servers. Invoice 2023028528. Summons to be served on Herminda Law Firm LLC. 6.20.23	\$45.00
06/21/2023	DLE Process Servers. Invoice 2023028532. Summons to be served on Quintero Broche P.A. 06.21.23	\$45.00
06/21/2023	DLE Process Servers. Invoice 2023028743. Subpoena to be served on Records Custodian of JP Morgan Chase Bank N.A CT Corporation System.	\$35.00
06/21/2023	DLE Process Servers. Invoice 2023028751. Subpoena to be served on Records Custodian of Regions Bank Corporation Service Company 06.21.23	\$60.00
06/21/2023	DLE Process Servers. Invoice 2023028748. Subpoena to be served on Records Custodian of Regions Bank Corporation Service Company. 06.21.23	\$60.00
06/21/2023	DLE Process Servers. Invoice 2023028754. Subpoena to be served on Records Custodian of Regions Bank Corporation Service Company. 06.21.23	\$60.00
06/22/2023	DLE Process Servers. Invoice 2023028092. Subpoena to be served on Corporate Legal Community Associations Bank. 6.22.23	\$105.00
06/23/2023	Florida E-Filing Portal Circuit Court. Filing Complaint. Gersten v. Jauegui P.A 06.23.23	\$406.00
06/23/2023	DLE Process Servers. Invoice 2023029012. Subpoena to be served on Records Custodian Excellent Services & Work LLC c/o R/A: Jose Antonio Gonzalez. 06.23.23	\$35.00
06/26/2023	DLE Process Servers. Invoice 2023028536. Summons to be served on Jose M. Quinon P.A. 06.21.23	\$45.00
06/26/2023	Amerant. Invoice 0626.23 - Production from Amerant Bank in response to Subpoena. 06.26.23	\$75.00
06/27/2023	Postage	\$9.96
06/28/2023	FEDEX. Invoice 07097. Florida Lawyers Mutual Insurance. Jauegui Law. 06.28.23	\$20.23

06/30/2023	Lexis Nexis Advance Legal Research Fee	\$166.13
06/30/2023	Lexis Nexis Advance Legal Research Fee	\$3.44
06/30/2023	Postage	\$8.10
06/30/2023	Photocopies	\$79.02
		\$4,164.11

ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Adriana Pavon	AP	39.2	\$325.00	\$11,655.00
Russell Landy	RML	45.1	\$525.00	\$23,677.50
Christopher Perse	CP	46.7	\$275.00	\$12,787.50
Melanie Damian	MME	16.3	\$550.00	\$8,415.00
Thomas Culmo	TAC	3.5	\$525.00	\$1,732.50
Kenneth Murena	KDM	61.3	\$525.00	\$32,182.50
Reesea Saetae	rs	4.7	\$100.00	\$0.00
Israel Lopez-Morillo	il	27.0	\$150.00	\$2,550.00
Patricia Baloyra	PB	22.0	\$400.00	\$8,800.00
RKL	RKL	13.4	\$525.00	\$7,035.00

Invoice Amount: \$112,999.11

Discount Amount Applied: (\$5,441.75)
Balance Due: \$107,557.36



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Payments Since Last Invoice

Date	Description	Amount
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Michael S. Kaufman, Esq. - HAMMOCKS BILLING 3/16- 4/4/23

3/17/23	Review email and response to Kenneth Murena regarding TD Bank agreed order	.10
3/18	Discussion with AC member(Marco Antonio Real) regarding Budget	.90
3/20	Attend Budget Adoption by Receiver	.20
3/20	Addressed latecomers to the Budget Adoption meeting. Residents who zoomed in after completion and answered their questions	.40
3/20	Addressed inquiries from Hammocks residents regarding request for absentee ballots. Contacted Jesmany Jomarron, Esq. with their concerns and with follow-up	1.50
3/22	Attended Receiver Town Hall	1.00
3/22	Research and shared with Receiver's team issues regarding refunds of assessments	.60
3/23	Reviewed Campaign rules regarding allegation of violation by candidates	.10
3/23	Telephone conference with Jesmany Jomarron, Esq. regarding alleged violation	.30
3/23	Second telephone conference with Jesmany Jomarron, Esq. regarding alleged violation	.60
3/23	Reviewed numerous communications with AC regarding sample ballot	.40
3/27	Attend AC meeting # 20	.90
3/27	Post AC meeting - Private questioning from Receiver and Receiver attorney regarding alleged campaign violation	.40
3/29	Telephone conference with Jesmany Jomarron, Esq. regarding Receiver decision as to alleged campaign violation	.30
3/29	Review Receiver's Second Supplemental Report filed 3/27	.80
3/30	Telephone conference with Jesmany Jomarron, Esq. regarding election protocols	.40
3/30	Attend Hammocks Election at Clubhouse	6.00
3/31	Answered numerous questions from local communities wanting to form a sub-association	1.20
4/4	Attended First Meeting of newly elected board	3.50

No further billing as counsel's position as attorney for Advisory Committee was eliminated with termination of AC

TOTAL HOURS ~~19.60~~ 18.40
x \$500.00 = \$ ~~9,800~~ due
9,200.00



INVOICE

Invoice # 461
Date: 07/16/2023
Due On: 08/15/2023

The Morgan Law Group, P.A.

55 Merrick Way, Suite 404
Coral Gables, FL 33134
Phone: (305) 569-9900
www.policyadvocate.com

Hammocks Community Association Incorporated
c/o Damian Valori Culmo
1000 Brickell Avenue, Suite 1020
Miami, FL 33131

BLT22-0005 - Receivership of Hammocks Community Association Incorporated

Services

Date	Attorney	Notes	Quantity	Total
05/16/2023	JJ	Telephone conference with Melanie Damian, Alyson Theale, Jeanine Ferreiro, and Melissa Vazquez regarding FSR responsiveness, estoppel responsibility, assessment modification, and technology upgrade.	0.60	\$300.00
05/16/2023	JJ	Prepared comprehensive note to file detailing telephone conference with FSR regarding Receiver's Memorandum addressing FSR issues including responsiveness, estoppels, assessment modifications, and others.	0.60	\$300.00
05/16/2023	JJ	Received and reviewed electronic mail correspondence from Melanie Damian to Russell Landy instructing that all phone and wifi issues will be handled by Jesmany Jomarron.	0.10	\$50.00

05/16/2023	JJ	Received and reviewed multiple electronic mail correspondence among Receiver Judge Gersten (ret.), Eric Thompson, and Russell Landy regarding approval of bronze windows at the Hammocks.	0.10	\$50.00
05/16/2023	JJ	Received and reviewed exchange of emails concerning approval of Suede ACC application.	0.20	\$100.00
05/16/2023	JJ	Received and reviewed Suede ACC application.	0.20	\$100.00
05/16/2023	JJ	Exchanged numerous communications with advisory board of directors regarding process by which FSR is expected to secure bids from vendors to avoid kickback problems and process for board of directors to review and approve.	0.80	\$400.00
05/17/2023	JJ	Prepared comprehensive electronic mail correspondence to Idalmen Ardisson, Kristen Gurucharri, and Russell Landy regarding finance committee review of outdoor fitness / playground equipment purchased by the prior board of directors.	0.40	\$200.00
05/17/2023	JJ	Exchanged electronic mail correspondence with Kenneth Dante Murena regarding analysis of Hammocks crime policy and procedure for filing suit.	0.20	\$100.00
05/17/2023	JJ	Reviewed and analyzed correspondence from crime policy insurance carrier, Philadelphia Indemnity Insurance Company, indicating that the claim is likely going to be denied based on their investigation.	0.40	\$200.00
05/17/2023	JJ	Reviewed and analyzed Hammocks' crime insurance policy issued by Philadelphia Indemnity Insurance Company.	0.50	\$250.00
05/18/2023	JJ	Reviewed and analyzed electronic mail correspondence from Melissa Vazquez responding to Receiver's Memorandum to FSR.	0.20	\$100.00
05/18/2023	JJ	Prepared comprehensive electronic mail correspondence to Melissa Vazquez replying to FSR's response to Receiver's Memorandum.	0.50	\$250.00
05/19/2023	JJ	Reviewed and analyzed electronic mail correspondence from Idalmen Ardisson, Hector	0.30	\$150.00

		Meneses, and Santiago Villareal sharing thoughts and view points concerning the Architectural Control Committee.		
05/19/2023	JJ	Exchanged electronic mail correspondence with Melissa Vazquez regarding volunteers for the committees.	0.20	\$100.00
05/19/2023	JJ	Reviewed and analyzed Fourth Interim Order approving payment of fees and costs.	0.20	\$100.00
05/19/2023	JJ	Reviewed and analyzed Motion for Extension of Time to file Receiver's Status Report.	0.10	\$50.00
05/19/2023	JJ	Reviewed and analyzed Order granting extension of time to file Receiver's Status Report.	0.10	\$50.00
05/19/2023	JJ	Reviewed and analyzed numerous communications from advisory board of directors raising concerns about communication received from FSR scheduling board certification training.	0.30	\$150.00
05/21/2023	JJ	Reviewed and analyzed joint correspondence from multiple owners demanding the Receiver address their concerns.	0.30	\$150.00
05/21/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Melanie Damian regarding joint letter of owners demanding the Receiver address their concerns.	0.50	\$250.00
05/22/2023	JJ	Received and reviewed electronic mail correspondence from Melissa Vazquez regarding FSR call center procedures and pending tickets.	0.10	\$50.00
05/22/2023	JJ	Received and reviewed electronic mail correspondence from Janine Ferreiro enclosing approved rental agreement for the clubhouse.	0.10	\$50.00
05/22/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Melanie Damian regarding response to follow up complaint of Daniel Beltran and other owners.	0.30	\$150.00
05/22/2023	JJ	Exchanged electronic mail correspondence with Adriana Pavon confirming no objection to motion to modify timing of status reports to the court to	0.10	\$50.00

		quarterly.		
05/22/2023	JJ	Reviewed and analyzed executed playground equipment contract and related documents including finance agreement, UCC-1 financing statement, and financing agreement.	0.80	\$400.00
05/22/2023	JJ	Exchanged multiple electronic mail correspondence with Idalmen Ardisson, Kristen Gurucharri, and Russell Landy regarding executed playground equipment contract.	0.40	\$200.00
05/23/2023	JJ	Received and reviewed comprehensive electronic mail correspondence from I. Ardisson regarding the rules of the Architectural Control Committee of the Hammocks.	0.20	\$115.00
05/24/2023	JJ	Telephone conference with Juan Franco regarding issues with security not patrolling the Cortland property.	0.20	\$100.00
05/24/2023	JJ	Communication to Receiver Judge Gersten (ret.) and Melanie Damian regarding Juan Franco's request for security at the Cortland property.	0.10	\$50.00
05/24/2023	JJ	Exchanged communications with Melissa Vazquez regarding additional security at the Cortland.	0.20	\$100.00
05/25/2023	JJ	Exchanged communications with the Advisory Board of Directors regarding appointment of a CPA for the finance committee.	0.10	\$50.00
05/25/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) and Eric Thompson regarding appointment of a CPA for the finance committee.	0.10	\$50.00
05/25/2023	JJ	Exchanged communication with the Advisory Board of Directors regarding scheduling of committee meetings.	0.10	\$50.00
05/25/2023	JJ	Exchanged communications with the Advisory Board of Directors regarding tech upgrades for the Hammocks.	0.10	\$50.00
05/25/2023	JJ	Reviewed and analyzed FSR open tickets.	0.50	\$250.00
05/25/2023	JJ	Communication with Advisory Board of Directors regarding FSR open tickets.	0.10	\$50.00

05/25/2023	JJ	Electronic mail correspondence to Advisory Board of Directors regarding FSR open tickets.	0.10	\$50.00
05/25/2023	JJ	Received and reviewed electronic mail correspondence regarding new architect for the ACC committee.	0.10	\$50.00
05/26/2023	JJ	Electronic mail correspondence to Marcoantonio Real enclosing copies of the proposed internet service provider contracts for Comcast and AT&T.	0.10	\$50.00
05/26/2023	JJ	Received and reviewed multiple electronic mail correspondence among Receiver Judge Gersten (ret.), Idalmen Ardisson, and Russell Landy regarding request for approval by the architectural control committee of Jean Carlos.	0.20	\$100.00
05/26/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten and Idalmen Ardisson regarding architect Antolin Cárdenas' agreement to serve on the Architectural Control Committee at the rate of \$150 per hour.	0.20	\$100.00
05/26/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Melissa Vazquez introducing new members to the FSR-Hammocks team.	0.30	\$150.00
05/28/2023	JJ	Reviewed and analyzed electronic mail correspondence received from CPA Jacqueline D. Greenberg enclosing engagement letter and list of questions concerning the relationship with the Hammocks.	0.20	\$100.00
05/28/2023	JJ	Reviewed and analyzed The Hammocks Terms and Conditions Addendum 2022 provided by Jacqueline D. Greenberg.	0.50	\$250.00
05/28/2023	JJ	Reviewed and analyzed The Hammocks Engagement Letter provided by CPA Jacqueline D. Greenberg.	0.50	\$250.00
05/28/2023	JJ	Prepared electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding review and analysis of Jacqueline D. Greenberg's Engagement Letter and Terms and Conditions.	0.40	\$200.00
05/28/2023	JJ	Exchanged multiple electronic mail	0.30	\$150.00

		correspondence with advisory board of directors changing the start time for the board of directors training course and providing detailed update on FSR's decision to make new additions to the Hammocks property management team including Corey Tickner, Danilo Baptista, and Barby Santovenia.		
05/30/2023	JJ	Exchanged electronic mail correspondence with Eric Thompson regarding review and analysis of CPA agreement and revisions to same.	0.30	\$150.00
05/30/2023	JJ	Received and reviewed electronic mail correspondence from Pete Cabrera and Melissa Vazquez regarding outstanding minutes from May 9, 2023, board of directors meeting.	0.10	\$50.00
05/30/2023	JJ	Reviewed and analyzed proposed minutes of the meeting of the board of directors on May 9, 2023.	0.60	\$300.00
05/30/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Carlos Villalobos regarding report on the governing documents committee and permission for FSR and attorney involvement.	0.30	\$150.00
05/30/2023	JJ	Reviewed and analyzed Hammocks governing documents and applicable Florida law in preparation for board certification training meeting.	0.80	\$400.00
05/30/2023	JJ	Reviewed and analyzed Notice of Appearance by attorneys representing Alfaro and Fernandez.	0.10	\$50.00
05/30/2023	JJ	Exchanged communications with advisory board of directors concerning confirmation of monthly payments for those owners approved during the Assessment Committee meeting.	0.20	\$100.00
05/31/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson to Chuck from Lakeview enclosing approved architectural control application.	0.20	\$100.00
05/31/2023	JJ	Exchanged electronic mail correspondence with Russell Landy regarding the finance committee's decision on the playground equipment contract.	0.10	\$50.00
05/31/2023	JJ	Reviewed and analyzed comprehensive electronic	0.20	\$100.00

		mail correspondence from Eric Thompson providing detailed analysis of the hearing before Judge Butchko where Sarmina Cetraro demanded interest on the amount of money claimed to be due in attorney's fees.		
05/31/2023	JJ	Performed legal research regarding the applicability of the conflict of interest statute to the Cetraro application for attorney's fees.	0.50	\$250.00
05/31/2023	JJ	Prepared electronic mail correspondence to Eric Thompson and Receiver Judge Gersten (ret.) quoting and analyzing conflict of interest statutes to the facts arguments before Judge Butchko on the Cetraro application for fees.	0.20	\$100.00
05/31/2023	JJ	Received and reviewed electronic mail correspondence from Eric Thompson regarding analysis of conflict of interest statutes.	0.20	\$100.00
05/31/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Carlos Villalobos regarding update on establishmnet of the governing documents committee.	0.10	\$50.00
05/31/2023	JJ	Travel to and and attendance at Hammocks Clubhouse for board certification course and multiple meetings with Alyson Theale, Danilo Baptista, Corey Tickner, and additional members of FSR staff as well as board members of the Hammocks, Receiver Judge Gersten (ret.), and Adam Ruff.	5.00	\$2,500.00
06/01/2023	JJ	Exchanged electronic mail correspondence with Idalmen Ardisson and Russell Landy regarding meeting to review playground equipment contract.	0.10	\$50.00
06/01/2023	JJ	Received and reviewed Receiver Judge Gersten (ret.) motion for modification of timing to file Receiver's Status Reports.	0.10	\$50.00
06/01/2023	JJ	Received and reviewed Order modifying timing of filing of Receiver's Status Reports.	0.10	\$50.00
06/01/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among the board members and the property manager following the board certification training meeting.	0.30	\$150.00

06/02/2023	JJ	Telephone conference with Russell Landy and Idalmen Ardisson regarding update on establishment of Architectural Control Committee, Finance Committee, and review of playground equipment contract.	0.80	\$400.00
06/02/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among the board members and property management team.	0.30	\$150.00
06/02/2023	JJ	Prepared detailed note to file following conference with Russell Landy and Idalmen Ardisson.	0.50	\$250.00
06/05/2023	JJ	Reviewed and analyzed electronic mail correspondence from Judge David Gersten (ret.) enclosing Miami-Dade County Code Violation issued against the Hammocks.	0.20	\$100.00
06/05/2023	JJ	Reviewed and analyzed demand by owners from the Sunflower Neighborhood of the Hammocks demanding to become a local association.	0.20	\$100.00
06/05/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) regarding demand by owners of the Sunflower Neighborhood who want to become their own sub association.	0.20	\$100.00
06/05/2023	JJ	Reviewed and analyzed 46 petitions from Sunflower owners requesting for Sunflower to be a local association within the Hammocks.	0.20	\$100.00
06/05/2023	JJ	Received and reviewed electronic mail correspondence from Russell Landy regarding alleged county code violation at the Hammocks.	0.10	\$50.00
06/05/2023	JJ	Reviewed and analyzed electronic mail correspondence from owner regarding access to the Wild Lime Park.	0.20	\$100.00
06/06/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Judge Gersten (ret.), First Service Residential, and Don Kearns regarding proposed agenda for upcoming meeting of the board of directors.	0.20	\$100.00
06/06/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Gary Held concerning damage to the fence and screen enclosure of Mr. Gerald Kohn - 9230 SW 150 Ave.	0.50	\$250.00

06/06/2023	JJ	Electronic mail correspondence to First Service Residential requesting update on efforts to address damage to the fence and screen enclosure of Mr. Gerald Kohn - 9230 SW 150 Ave.	0.10	\$50.00
06/06/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson requesting update on efforts to address damage to the fence and screen enclosure of Mr. Gerald Kohn - 9230 SW 150 Ave.	0.10	\$50.00
06/06/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence from Hammocks board members and First Service Residential revising and discussing the minutes of the last board meeting.	0.50	\$250.00
06/06/2023	JJ	Telephone conference with Gary Held regarding lack of response on fence damage to Gerald Kohn's property.	0.20	\$100.00
06/07/2023	JJ	Received and reviewed electronic mail correspondence from Russell Landy regarding contract for fireworks at the Ham	0.10	\$50.00
06/07/2023	JJ	Telephone conference with Russell Landy regarding fireworks contract for the Hammocks.	0.10	\$50.00
06/07/2023	JJ	Communication with the board of directors concerning the fireworks contract.	0.10	\$50.00
06/07/2023	JJ	Received and reviewed proposed fireworks contract.	0.20	\$100.00
06/07/2023	JJ	Reviewed and analyzed governing documents to determine legality of a Neighborhood becoming a local association.	0.40	\$200.00
06/07/2023	JJ	Zoom video conference with Receiver Judge Gersten (ret.) and Eric Thompson regarding review of proposed agenda for the meeting of the board of directors.	1.50	\$750.00
06/07/2023	JJ	Exchanged, reviewed, and analyzed numerous communications with the advisory board of directors regarding items requested to be added to the agenda for the upcoming board meeting.	0.30	\$150.00
06/08/2023	JJ	Received and reviewed electronic mail	0.10	\$50.00

		correspondence from Receiver Judge Gersten (ret.) regarding approved minutes of the prior meeting of the board of directors.		
06/08/2023	JJ	Reviewed and analyzed electronic mail correspondence from Gerald Kohn concerning damages to his fence and screen enclosure caused by a tree maintained by the Hammocks.	0.20	\$100.00
06/08/2023	JJ	Received and reviewed electronic mail correspondence from Gary Held following up on Gerald Kohn's complaint regarding damage to his property without any communication by FSR.	0.10	\$50.00
06/08/2023	JJ	Prepared comprehensive electronic mail correspondence to First Service Residential on behalf of Receiver Judge Gersten (ret.) requesting details on Hammocks affairs in preparation for Receiver's Report to the owners at the upcoming meeting of the board directors.	0.60	\$300.00
06/08/2023	JJ	Exchanged electronic mail correspondence with First Service Residential Team enclosing approved notice of meeting of the board of directors.	0.30	\$150.00
06/08/2023	JJ	Comprehensive electronic mail correspondence to First Service Residential requesting updates on changing owners from quarterly to monthly payment of assessments.	0.30	\$150.00
06/08/2023	JJ	Exchanged, reviewed, and numerous communications from the advisory board of directors raising concerns about the drainage system, fireworks display, the budget, and timing of the filing of Receiver's status reports.	0.80	\$400.00
06/09/2023	JJ	Electronic mail correspondence to Alyson Theale, Corey Trickner, Receiver Judge Gersten (ret.), and Eric Thompson regarding the complaint of Gerald Kohn.	0.10	\$50.00
06/09/2023	JJ	Electronic mail correspondence from Receiver Judge Gersten (ret.) requesting a response to Gerald Kohn.	0.10	\$50.00
06/09/2023	JJ	Received and reviewed electronic mail correspondence from Corey Tickner regarding his contact with Gerald Kohn and plan to address the	0.10	\$50.00

		problem with his property.		
06/09/2023	JJ	Comprehensive electronic mail correspondence to Corey Tickner requesting a response detailing their efforts to address the concerns raised by Gerald Kohn.	0.30	\$150.00
06/09/2023	JJ	Second electronic mail correspondence from Receiver Judge Gersten (ret.) requesting a written response to Gerald Kohn.	0.10	\$50.00
06/09/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Corey Tickner detailing all steps taken to address Gerald Kohn's efforts and outlining the First Service Residential Standard Operating Procedure for fallen trees including insurance considerations.	0.60	\$300.00
06/09/2023	JJ	Reviewed and analyzed detailed response from Melissa Vazquez in response to Receiver Judge Gersten (ret.)'s questions concerning the affairs of the Hammocks in preparation for the upcoming meeting of the board of directors.	0.30	\$150.00
06/09/2023	JJ	Received and reviewed electronic mail correspondence from R. Landy regarding 90-day delinquent owner status.	0.10	\$50.00
06/09/2023	JJ	Reviewed and analyzed detailed response from Corey Tickner in response to Receiver Judge Gersten (ret.)'s questions concerning the affairs of the Hammocks in preparation for the upcoming meeting of the board of directors.	0.30	\$150.00
06/09/2023	JJ	Received and reviewed electronic mail correspondence exchange between Receiver Judge Gersten (ret.) and Russell Landy regarding enforcement of collection procedures against delinquent owners.	0.10	\$50.00
06/12/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from Receiver Judge Gersten (ret.) and Corey Tickner regarding updates on Hammocks affairs in preparation for upcoming meeting of the board of directors.	0.40	\$200.00
06/13/2023	JJ	Electronic mail correspondence to Corey Tickner offering a permit expediter to assist with pool code violations.	0.10	\$50.00

06/13/2023	JJ	Attendance at meeting of the board of directors.	3.50	\$1,750.00
06/13/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) debriefing on meeting of the board of directors.	0.40	\$200.00
06/13/2023	JJ	Reviewed and analyzed comprehensive report for Receiver during board meeting prepared by Eric Thompson.	0.40	\$200.00
06/14/2023	JJ	Received and reviewed multiple electronic mail correspondence from Idalmen Ardisson and Receiver Judge Gersten (ret.) regarding contract of architect for the Architectural Control Committee.	0.10	\$50.00
06/14/2023	JJ	Reviewed and analyzed contract of Architect Antolín Cardenas for services on the Architectural Control Committee.	0.20	\$100.00
06/14/2023	JJ	Reviewed and analyzed electronic mail correspondence from Juan Franco regarding approval from the Hammocks to make renovations as required by the city for a permit approval.	0.30	\$150.00
06/14/2023	JJ	Reviewed and analyzed governing documents to determine whether Cortland would need to submit an ACC application.	0.20	\$100.00
06/14/2023	JJ	Exchanged multiple communications with advisory board of directors including noting that list of pending cases will be listed on the minutes of the board meeting, update on new efforts by Turf Management, communication responsiveness and corporate culture of FSR, finances, and owner delinquencies.	0.30	\$150.00
06/15/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence from Melissa Vazquez to Steve Katz attempting to get more information about why the Nelly Arriaga account ledger is not balancing in an effort to respond to the former owner.	0.30	\$150.00
06/16/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among FSR and Steve Katz regarding Nelly Arriaga ledger balance.	0.20	\$100.00

06/16/2023	JJ	Received and reviewed communications among board members regarding FSR feedback and response time.	0.10	\$50.00
06/20/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding Hammocks receivership issues including FSR, security versus off duty police, financial statements, fence maintenance, and overall status update.	1.30	\$650.00
06/21/2023	JJ	Telephone conference with Kristen Gurucharri regarding upcoming finance committee meeting and communication with retained CPA, Jacqueline D Greenberg.	0.10	\$50.00
06/21/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from Idalmen Ardisson and property management team concerning ACC application for owner Alma Loos (Hacienda).	0.30	\$150.00
06/21/2023	JJ	Reviewed and analyzed exchange of electronic mail correspondence among Judge Gersten, Russell Landy, and Idalmen ardisson regarding denied application for a shingle roof in the Chanterelle community.	0.30	\$150.00
06/21/2023	JJ	Exchanged electronic mail correspondence with Judge Gersten and First Service Residential regarding credentials for administrative access to AirTable, RingCentral, and website.	0.30	\$150.00
06/22/2023	JJ	Reviewed and analyzed comprehensive analysis provided by First Service Residential and supporting documentation regarding Nelly Arriaga's request for a refund and need to write off the balance.	0.60	\$300.00
06/22/2023	JJ	Prepared comprehensive electronic mail correspondence to Receiver Judge Gersten (ret.) and Melanie Damian analyzing the issues of Nelly Arriaga's balance write off and refund issuance and making a recommendation.	0.50	\$250.00
06/22/2023	JJ	Exchanged electronic mail correspondence with Melissa Vazquez regarding additional information on the Nelly Arriaga issues.	0.20	\$100.00
06/22/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding upcoming advisory board	0.40	\$200.00

		meeting and status updates.		
06/22/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and FSR regarding approval of proposed FAQ for the Hammocks website.	0.20	\$100.00
06/23/2023	JJ	Exchanged electronic mail correspondence with FSR team regarding Notice of Meeting of the Governing Documents Committee.	0.20	\$100.00
06/23/2023	JJ	Reviewed and analyzed Notice of Meeting of the Governing Docs Committee.	0.10	\$50.00
06/23/2023	JJ	Telephone conference with Carlos Villalobos regarding upcoming meeting of the Governing Documents Committee including vision for the committee and process of amending and interpreting the governing documents.	0.30	\$150.00
06/23/2023	JJ	Reviewed and analyzed and exchanged multiple electronic mail correspondence with the FSR team regarding claim by Nelly Arriaga for an overpayment refund.	0.20	\$100.00
06/23/2023	JJ	Received and reviewed multiple exchange of electronic mail correspondence among FSR team and Idalemn Ardisson concerning details of financial statements.	0.10	\$50.00
06/23/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding upcoming advisory board of directors meeting and outcome of Cepero appeal.	0.30	\$150.00
06/23/2023	JJ	Exchanged electronic mail correspondence with FSR team and Judge Gersten (ret.) regarding FSR's contract review and staffing vision.	0.20	\$100.00
06/23/2023	JJ	Reviewed and analyzed the Cepero appellate ruling in favor of the Hammocks.	0.80	\$400.00
06/23/2023	JJ	Exchanged electronic mail correspondence with Idalmen Ardisson and Judge Gersten (ret.) regarding ACC application of Cortland.	0.10	\$50.00
06/23/2023	JJ	Exchanged multiple communications with the advisory board of directors to secure availability for meeting with FSR to review Hammocks vendor	0.30	\$150.00

		contracts.		
06/23/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) regarding minutes of the meeting of the board of directors.	0.10	\$50.00
06/23/2023	JJ	Received and reviewed exchange of emails among FSR team and Donald Kearns regarding owner request for ACC application for new windows.	0.10	\$50.00
06/23/2023	JJ	Received and reviewed multiple electronic mail correspondence among finance committee members regarding coordination of meetings.	0.10	\$50.00
06/23/2023	JJ	Received and reviewed electronic mail correspondence among Donald Kearns, Carlos Villalobos, and FSR to prepare proper notice of upcoming governing documents committee meeting.	0.10	\$50.00
06/23/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Melanie Damian regarding approval for mulch project at the Black Creek playground.	0.10	\$50.00
06/26/2023	JJ	Exchanged electronic mail correspondence with Corey Tickner regarding updated leadership chart for the Hammocks.	0.10	\$50.00
06/26/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) regarding and account ledger for property owner Farm Glam Hammocks LLC.	0.30	\$150.00
06/26/2023	JJ	Electronic mail correspondence to Carlos Villalobos enclosing copy of proposed Rules of the Board of Directors.	0.10	\$50.00
06/27/2023	JJ	Telephone conference with Pete Cabrera regarding details of Wild Lime Park fence concerns.	0.50	\$250.00
06/27/2023	JJ	Reviewed and analyzed photos and video from Pete Cabrera regarding Wild Lime Park fence	0.20	\$100.00
06/27/2023	JJ	Telephone conference with Donald Kearns regarding Wild Lime Park fence concerns.	0.20	\$100.00

06/27/2023	JJ	Prepared for Zoom video conference with the Advisory Board of Directors and Receiver Judge Gersten (ret.).	0.60	\$300.00
06/27/2023	JJ	Attended video conference with Advisory Board of Directors and Receiver to address homeowner concerns including fences, security, attorney's fees, FSR hotline, and owner delinquencies.	2.70	\$1,350.00
06/27/2023	JJ	Received and reviewed exchange of electronic mail correspondence among Idalmen Ardisson and FSR and proposed agenda and meeting notice for upcoming Architectural Control Committee meeting.	0.20	\$100.00
06/27/2023	JJ	Electronic mail correspondence to FSR enclosing editable version of the Hammocks organizational chart.	0.10	\$50.00
06/27/2023	JJ	Exchanged electronic mail correspondence with representation of Sunflower owners regarding creation of a local association.	0.20	\$100.00
06/27/2023	JJ	Exchanged communications with Kristen Gurucharri regarding upcoming Neighborhood Committee meeting.	0.10	\$50.00
06/27/2023	JJ	Received and reviewed and analyzed electronic mail correspondence from Judge Gersten (ret.) and Melanie Damian regarding Jose A Gonzalez and Excellent Services & Work LLC.	0.10	\$50.00
06/27/2023	JJ	Exchanged multiple electronic mail correspondence with Kristen Gurucharri, Idalmen Ardisson, and Jacqueline D. Greenberg, Finance Committee CPA.	0.20	\$100.00
06/27/2023	JJ	Reviewed and analyzed exchanged from Todd Botner and FSR forwarded by Kristen Gurucharri.	0.20	\$100.00
06/27/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Carlos Villalobos regarding approval of Governing Documents committee.	0.30	\$150.00
06/27/2023	JJ	Researched governing documents and prior board minutes to ensure approval of Governing Documents committee.	0.40	\$200.00

06/27/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten and Donald Kearns regarding approval of owners requesting a financial hardship exception.	0.20	\$100.00
06/27/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence concerning revisions to the proposed board meeting minutes.	0.40	\$200.00
06/27/2023	JJ	Exchanged electronic mail correspondence with Carlos Villalobos regarding procedure for amendments to the governing documents.	0.10	\$50.00
06/28/2023	JJ	Electronic mail correspondence to Kristen Gurucharri regarding scheduling of Neighborhood Committee meeting.	0.10	\$50.00
06/28/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson and enclosed revised agenda for the upcoming ACC meeting.	0.10	\$50.00
06/28/2023	JJ	Reviewed and analyzed electronic mail correspondence from Ana Danton with enclosed pictures.	0.20	\$100.00
06/28/2023	JJ	Reviewed and analyzed electronic mail correspondence from Ana Danton and enclosed records regarding Hammocks loan.	0.20	\$100.00
06/29/2023	JJ	Telephone conference with Andrea Hall regarding concerns of owners at the Sunflower community.	0.30	\$150.00
06/29/2023	JJ	Telephone conference with Kristen Gurucharri regarding upcoming Finance and Assessment committee meeting.	0.20	\$100.00
06/29/2023	JJ	Telephone conference with Melissa Vazquez regarding response to Nelly Arriaga.	0.10	\$50.00
06/29/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding response Nelly Arriaga and protocol for future communications regarding account balances at the Hammocks.	0.30	\$150.00
06/29/2023	JJ	Video conference with Idalmen Ardisson, Kristen Gurucharri, and Receiver Judge Gersten (ret.) meeting and greeting with Jacqueline Greenberg and preparing for upcoming finance committee	1.40	\$700.00

		meetings.		
06/29/2023	JJ	Reviewed and analyzed Spanish email from owner complaining about high legal costs.	0.20	\$100.00
06/30/2023	JJ	Reviewed and analyzed numerous communications and postings from board members concerning the actions of other board members and debate over its propriety.	0.80	\$400.00
06/30/2023	JJ	Telephone conference with Donald Kearns regarding Hammocks governing documents and procedures.	0.30	\$150.00
06/30/2023	JJ	Attend to Cortland at the Hammocks ACC application.	0.10	\$50.00
			Services Subtotal	\$29,765.00

Expenses

Date	Notes	Quantity	Rate	Total
05/19/2023	Zoom monthly fee for webinar and pro.	1.00	\$120.98	\$120.98
05/31/2023	Village Hardware -- Moving straps to secure Vibe Whiteboard in place while transporting to Hammocks Clubhouse	1.00	\$26.73	\$26.73
06/19/2023	Zoom monthly fee for webinar and pro.	1.00	\$120.98	\$120.98
			Expenses Subtotal	\$268.69
			Subtotal	\$30,033.69
			Total	\$30,033.69

Please make all amounts payable to: The Morgan Law Group, P.A.

Please pay within 30 days.

Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.

Client ID: 90156

Invoice #10054 - 05/31/23

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	22.30	428.00	9,544.40
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	5.00	450.00	2,250.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	1.20	360.00	432.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	0.20	450.00	90.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	24.40	290.00	7,076.00
RLW - RACHEL WEISS - CONSULTANT CPA, CFE	12.70	430.00	5,461.00
TOTAL	<u>65.80</u>		<u>\$24,853.40</u>
	BLENDED RATE	\$377.71	
	DISCOUNT (17%*)		(3,827.28)
	TOTAL EXPENSES		<u>328.75</u>
TOTAL AMOUNT OF THIS INVOICE			<u>\$21,354.87</u>
	ADJUSTED BLENDED RATE	\$319.55	

* DISCOUNT RELATES TO ALL STAFF RATES, EXCEPT PARTNERS, SUBJECT TO CAPPED FLAT RATE OF \$450 PER HOUR.

Kapila Building • 1000 South Federal Highway • Suite 200 • Fort Lauderdale FL 33316
• Broward 954-761-1011 • Dade 786-517-5771
Affiliated Office in London, England
www.kapilamukamal.com



Kapila Mukamal

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Fort Lauderdale, FL 33316

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EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.
C/O JUDGE DAVID M. GERSTEN, RECEIVER
VIA EMAIL: DGERSTEN@GRSM.COM;
ETHOMPSON@GRSM.COM

Invoice: 10054

05/31/2023

Client ID: 90156

For Professional Services Rendered Through May 31, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
05/01/2023	MMD	ANALYSIS OF COCO TREE SERVICE INVOICES.	0.40	180.00
05/02/2023	SKB	REVIEW AND ANALYZE VENDOR PAYMENTS AND CONFIRM INVOICES WITH MATCHED PAYMENTS FOR COCO TREE SERVICE (3.7 HRS), OFF DUTY SERVICES (.4 HRS), A&F MANAGEMENT SERVICES (.4 HRS) AND JIJ PROFESSIONAL SERVICES (.3 HRS).	4.80	2,054.40
05/02/2023	SKB	REVIEW AND SUMMARIZE BUDGET VERSES P&L COMPARISON SCHEDULE.	0.40	171.20
05/02/2023	MMD	LOCATE ADDITIONAL BANK SUPPORT REQUESTED BY CRIME POLICY CARRIER.	0.10	45.00
05/02/2023	MMD	CONTINUE ANALYSIS OF INVOICE SUPPORT FOR VENDORS THAT WERE PAID WHO RECEIVED LESS THAN EQUIVALENT VALUE.	1.10	495.00
05/03/2023	RLW	REVIEW VENDOR INVOICES AND MATCH TO GL TRANSACTIONS	0.20	86.00
05/03/2023	SKB	CONTINUE TO REVIEW AND ANALYZE VENDOR PAYMENTS AND CONFIRM INVOICES WITH MATCHED PAYMENTS FOR COCO TREE SERVICE (.2 HRS), OFF DUTY SERVICES (.2 HRS), AND A&F MANAGEMENT SERVICES (.2 HRS).	0.60	256.80
05/03/2023	MMD	DRAFT STATUS REPORT.	0.30	135.00
05/03/2023	JLP	RESEARCH, IDENTIFY, AND SEPARATE ALL INVOICE SUPPORT PERTAINING TO RAUL GONZALEZ AND OFF DUTY SERVICES OF SFL LLC	1.40	406.00
05/03/2023	SRK	REVIEW DRAFT OF INPUT FOR RECEIVER'S REPORT	0.20	90.00
05/04/2023	RLW	CONTINUE TO REVIEW VENDOR INVOICES AND MATCH TO GL TRANSACTIONS	5.80	2,494.00
05/05/2023	RLW	EXAMINE DISCO SYSTEM FOR A&F INVOICES	2.40	1,032.00
05/05/2023	JLP	RESEARCH, IDENTIFY, AND SEPARATE ALL INVOICE SUPPORT PERTAINING TO RAUL GONZALEZ AND OFF DUTY SERVICES OF SFL LLC	2.40	696.00
05/08/2023	RLW	BUDGET ANALYSIS	0.30	129.00
05/08/2023	SKB	PREPARE BUDGET COMPARISON CONSOLIDATION SUMMARY FOR D&O ANALYSIS.	0.50	214.00
05/08/2023	MMD	RESPOND TO EMAIL FROM COUNSEL RE EMPLOYEE ACTIVITY.	0.10	45.00

05/09/2023	RLW	CONTINUE BUDGET ANALYSIS	0.80	344.00
05/09/2023	SKB	UPDATE PAYROLL ANALYSIS WITH ADDRESS INFORMATION PROVIDED BY ADP AND DATE OF BIRTHS. RESEARCH AND ANALYZE DISCO DOCUMENT MANAGEMENT SYSTEM FOR EMPLOYEE FILES ON THOSE WITH NO INFORMATION FROM ADP.	2.90	1,241.20
05/09/2023	SKB	REVIEW AND REVISE BUDGET COMPARISON CONSOLIDATION SUMMARY FOR D&O ANALYSIS.	0.60	256.80
05/09/2023	MMD	TC WITH KRY'S GOODWIN RE HAMMOCKS EMPLOYEES.	0.60	270.00
05/09/2023	MMD	CONDUCT RESEARCH ON EMPLOYEE INFORMATION NEEDED FOR LIEN SEARCHES.	0.80	360.00
05/09/2023	JLP	RESEARCH, IDENTIFY, AND SEPARATE ALL INVOICE SUPPORT PERTAINING TO RAUL GONZALEZ AND OFF DUTY SERVICES OF SFL LLC	3.50	1,015.00
05/10/2023	RLW	CONTINUE BUDGET ANALYSIS	1.20	516.00
05/11/2023	RLW	CONTINUE BUDGET ANALYSIS	2.00	860.00
05/11/2023	SKB	REVIEW AND REVISE DETAIL AND SUMMARY BUDGET COMPARISON AND TRANSACTION SUMMARY COMPARISON SCHEDULES FOR VARIOUS VENDORS FOR D&O ANALYSIS.	1.00	428.00
05/15/2023	SKB	REVIEW AND REVISE BUDGET TO ACTUAL SCHEDULES FOR D&O ANALYSIS.	0.30	128.40
05/17/2023	SKB	RESEARCH AND ADDRESS EMAIL INQUIRY FROM M. DAVIS REGARDING AUDIT FILES.	0.20	85.60
05/17/2023	SKB	REVIEW NEW DOCUMENTS PRODUCED FROM R. LANDY REGARDING BANK AND LOAN DOCUMENTS.	0.40	171.20
05/17/2023	MMD	ATTEND TC WITH COUNSEL RE GHILARDI AND ALBRI CONSULTING.	0.20	90.00
05/17/2023	MMD	REVIEW BANK RECORDS PROVIDED FOR GHILARDI AND ALBRI.	0.30	135.00
05/17/2023	MMD	RESPOND TO COUNSEL REGARDING INSURANCE COMPANY INQUIRY RE FINANCIALS.	0.30	135.00
05/18/2023	SKB	REVIEW AND ANALYZE BANK DOCUMENTS PRODUCED FOR ALBRI CONSULTING AND MONICA GHILARDI AND LOAN DOCUMENT RELATING TO MORTGAGE LOAN.	0.80	342.40
05/18/2023	MMD	REVIEW PRODUCTION FROM CPA.	0.80	360.00
05/19/2023	SKB	REVIEW AND ANALYZE ALBRI CONSULTING AND MONICA GHILARDI BANK DOCUMENTS PRODUCED TO PREPARE BANK RECONSTRUCTION AND ACCOMPANYING LOAN DOCUMENTS PRODUCED RELATED TO MORTGAGE.	0.40	171.20
05/19/2023	JLP	CALL WITH SURUCHI BANEZ REGARDING ALBRI CONSULTING AND MONICA GILARADI MORTGAGE PLAN OF ACTION	0.30	87.00
05/22/2023	SKB	CONTINUE TO REVIEW AND ANALYZE ALBRI CONSULTING AND MONICA GHILARDI BANK DOCUMENTS PRODUCED TO PREPARE BANK RECONSTRUCTION AND ACCOMPANYING LOAN DOCUMENTS PRODUCED RELATED TO MORTGAGE.	0.50	214.00
05/22/2023	JLP	REVIEW, ANALYZE, AND INDEX NEWLY OBTAINED FILES PERTAINING TO ALBRI CONSULTING, MONICA GHILARDI, AND	1.40	406.00

E&J GENERAL SERVICES				
05/23/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION OF ALBRI AND MONICA GHILARDI BANK STATEMENTS TO IDENTIFY PAYMENTS RECEIVED DIRECTLY FROM HOA AND PAYMENTS MADE FOR MORTGAGE.	0.30	128.40
05/23/2023	JLP	CONTINUE ANALYZING AND INDEXING NEWLY OBTAINED FILES PERTAINING TO ALBRI CONSULTING, MONICA GHILARDI, AND E&J GENERAL SERVICES. INCORPORATE NEWLY OBTAINED BANK DOCUMENTS WITHIN BANK INVENTORY SCHEDULE	2.90	841.00
05/23/2023	JLP	ANALYZE BANK RECORDS FOR ALBRI CONSULTING AND MONICA GILARDI AND EXTRACT DATA TO SEND TO CFIS FOR CONVERSION INTO DATABASE FORMAT.	0.40	116.00
05/24/2023	SKB	RESEARCH AND ADDRESS EMAIL FROM RUSSELL LANDY REGARDING ALBRI CONSULTING, WORLDWIDE SOLUTIONS, JAVIER CEPPI AND COMPUFIX BANK SUPPORT.	0.70	299.60
05/25/2023	SKB	RESEARCH AND ADDRESS EMAIL REQUEST FROM CHRIS PERSE REGARDING RICARDO HERMIDA, JAUREGUI LAW AND QUINTERO BROCHE PA.	1.20	513.60
05/26/2023	FDD	REVIEW BANK RECORDS AND PREPARE A DOCUMENT REQUEST LIST.	1.20	432.00
05/26/2023	SKB	REVIEW AND REVISE ALBRI CONSULTING BANK RECONSTRUCTION FOR JPMC ACCOUNT #1811 FOR PURPOSES OF TRACING PURCHASE OF LOAN.	1.90	813.20
05/26/2023	SKB	IDENTIFY MISSING BANK STATEMENTS AND BANK SUPPORT AND DRAFT TRANSMITTAL TO FOLLOW-UP WITH COUNSEL.	0.80	342.40
05/26/2023	SKB	PREPARE TRANSACTION DETAIL FOR JAVIER CEPPI AND PROVIDE SUPPORTING BANK DOCUMENTS TO COUNSEL AS REQUESTED BY STATE ATTORNEY.	0.90	385.20
05/26/2023	SKB	REVIEW AND REVISE BUDGET ANALYSIS AND INVOICE ANALYSIS WITH M. DAVIS.	0.40	171.20
05/26/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR ALBRI CONSULTING LLC, CHASE BANK, ACCOUNT NO. 1811 FROM THE PERIOD OF OCTOBER 2020 THROUGH AUGUST 2023. CREATE ALPHA NAMES, CATEGORIES, AND SUMMARIZE DATA BASED ON BANK RECONSTRUCTION	4.40	1,276.00
05/30/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION FOR MONICA GHILARDI AND DANTE CHAUCA JPMC ACCOUNT #'S 7898 AND 4111 TO TRACE FUNDS TO MORTGAGE PAYMENTS.	0.70	299.60
05/30/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR MONICA GHILARDI AND DANTE CHAUCA JP MORGAN CHASE BANK, ACCOUNT # 7898 AND #4111, FOR THE PERIOD FROM DECEMBER 8, 2018 THROUGH MARCH 7, 2023	3.30	957.00
05/31/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION FOR MONICA GHILARDI AND DANTE CHAUCA JPMC ACCOUNT #'S 7898 AND 4111. DRAFT HIGHLIGHTS OF FINDINGS FROM ALIBRI AND GHILARDI/CHAUCA RECONSTRUCTIONS REGARDING TRACING OF FUNDS TO MORTGAGE PAYMENTS.	2.00	856.00

05/31/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR MONICA GHILARDI AND DANTE CHAUCA JP MORGAN CHASE BANK, ACCOUNT # 7898 AND #4111, FOR THE PERIOD FROM DECEMBER 8, 2018 THROUGH MARCH 7, 2023. PREPARE PIVOT TABLES BASED ON BANK ACTIVITY	4.40	1,276.00
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24,853.40

24,853.40

EXPENSES

05/23/2023	EXP	ACTIONABLE INTELLIGENCE TECHNOLOGIES - INV 2896 - MAY 2023		324.00
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05/31/2023	EXP	SHAREFILE - MAY 2023		4.75
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328.75

328.75

	Discount (17%*)		(3,827.28)
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	Total amount of this invoice		<u>\$21,354.87</u>
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OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name:	The Northern Trust Company 1100 East Las Olas Blvd. Fort Lauderdale, FL 33301-2387 Phone: 954-768-4053 Fax: 954-768-4017
Bank ABA Routing:	071000152
Swift Code:	CNORUS44
Account Name:	KAPILAMUKAMAL, LLP
Account Number:	1171120036

* DISCOUNT RELATES TO ALL STAFF RATES, EXCEPT PARTNERS, SUBJECT TO CAPPED FLAT RATE OF \$450 PER HOUR.

Invoice payable upon receipt. Thank you for this opportunity to be of service.

Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.

Client ID: 90156

Invoice #10123 - 06/30/23

TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	8.80	428.00	3,766.40
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	6.70	450.00	3,015.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	1.30	360.00	468.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	1.20	450.00	540.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	0.50	290.00	145.00
TOTAL	<u>18.50</u>		<u>\$7,934.40</u>
	BLENDED RATE	\$428.89	
	DISCOUNT (17%*)		(744.50)
	TOTAL EXPENSES		<u>25,004.50</u>
TOTAL AMOUNT OF THIS INVOICE			<u>\$32,194.40</u>
	ADJUSTED BLENDED RATE	\$388.64	

* DISCOUNT RELATES TO ALL STAFF RATES, EXCEPT PARTNERS, SUBJECT TO CAPPED FLAT RATE OF \$450 PER HOUR.



Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

1000 S. Federal Highway, Suite 200

Fort Lauderdale, FL 33316

Phone - 954-761-1011 F - 954-761-1033 www.kapilamukamal.com
EIN #46-5394135

ANA DANTON V. HAMMOCKS COMM. ASSOC., INC.

C/O JUDGE DAVID M. GERSTEN, RECEIVER

VIA EMAIL: DGERSTEN@GRSM.COM;

ETHOMPSON@GRSM.COM

Invoice: 10123

06/30/2023

Client ID: 90156

For Professional Services Rendered Through June 30, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
06/01/2023	SKB	REVIEW AND ANALYZE ALBRI AND GHILARDI/CHAUCA RECONSTRUCTIONS WITH M. DAVIS FOR TRACING OF MORTGAGE FUNDS AND PREPARE PDF OF SCHEDULES PREPARED TO DISCUSS WITH RUSSELL LANDY.	0.80	342.40
06/01/2023	MMD	PREPARE TRACING ANALYSIS OF FUNDS USED TO PAY INSIDER MORTGAGES AND PERSONAL EXPENSES.	2.40	1,080.00
06/02/2023	SKB	UPDATE BUDGET COMPARISON ANALYSIS WITH 2023 PROPOSED AMOUNTS.	1.10	470.80
06/02/2023	MMD	DRAFT EMAIL TO COUNSEL RE MORTGAGE TRACING.	0.40	180.00
06/05/2023	SKB	REVIEW AND REVISE PAYROLL ANALYSIS COMPARISON BETWEEN W-2'S AND PAYROLL HISTORY REPORTS PROVIDED BY ADP. DRAFT FINDINGS FROM VARIANCES.	1.50	642.00
06/06/2023	SKB	PARTICIPATE IN T/C WITH R. LANDY, M. DAVIS AND C. PERSE REGARDING MORTGAGE TRACING ANALYSIS.	0.60	256.80
06/06/2023	MMD	TC WITH COUNSEL RE HAMMOCKS TRACING ANALYSIS.	0.50	225.00
06/06/2023	SKB	RESEARCH AND ADDRESS EMAIL FROM K. MURENA REGARDING 2022 FINANCIAL STATEMENTS.	0.40	171.20
06/06/2023	SKB	RESEARCH AND ADDRESS REQUEST FROM R. LANDY REGARDING TRANSFERS TO UNKNOWN BANK ACCOUNTS FROM MORTGAGE TRACING ANALYSIS.	0.80	342.40
06/08/2023	MMD	EMAIL FROM COUNSEL REGARDING CRIME POLICY CLAIM STATUS.	0.10	45.00
06/12/2023	SKB	T/C WITH K. MURENA, R. LANDY AND M. DAVIS REGARDING PREPARATION OF FINANCIALS AND EMAIL FROM INSURANCE CARRIER.	0.20	85.60
06/12/2023	MMD	ATTEND MEETING WITH COUNSEL.	0.20	90.00
06/13/2023	FDD	T/C WITH VALID8 RE: BANK DATA PROJECT.	0.30	108.00
06/13/2023	SKB	PARTICIPATE IN T/C WITH VALID 8 REGARDING RECONSTRUCTION OF DEPOSITS.	0.40	171.20
06/13/2023	MMD	ATTEND TC WITH VALID8.	0.50	225.00
06/14/2023	SKB	REVIEW AND ANALYZE ADP PRODUCTION FROM MARY DHANJI AND UPDATE PAYROLL ANALYSIS AS NEEDED.	0.40	171.20
06/15/2023	MMD	REVIEW UPDATED BANK RECONSTRUCTIONS AND PAYROLL	1.70	765.00

		ANALYSIS.		
06/19/2023	MMD	ATTEND TO VALIDATE AGREEMENT.	0.50	225.00
06/19/2023	SRK	REVIEW VALID AGREEMENT (.70); TELEPHONE CONFERENCE WITH MELISSA DAVIS TO DISCUSS TERMS (.50)	1.20	540.00
06/20/2023	MMD	ATTEND TO VALID8 CONTRACT.	0.30	135.00
06/22/2023	SKB	PREPARE BANK RECONSTRUCTIONS OF HOMEOWNER DEPOSITS.	1.00	428.00
06/22/2023	FDD	PREPARE RECONSTRUCTIONS OF HOMEOWNER DEPOSITS.	1.00	360.00
06/23/2023	SKB	RESEARCH AND ADDRESS INQUIRY FROM R. LANDY REGARDING WORLDWIDE SOLUTIONS BUSINESS TRANSACTIONS.	1.20	513.60
06/23/2023	MMD	REVIEW EMAILS RE WORLDWIDE COMPLAINT.	0.10	45.00
06/27/2023	SKB	REVIEW AND ANALYZE DOCUMENT PRODUCTION FROM AMERANT BANK AND UPDATE INVENTORY ACCORDINGLY.	0.40	171.20
06/29/2023	JLP	ANALYZE BANK RECORDS AND PREPARE RECONSTRUCTION OF BANKING ACTIVITY FOR HAMMOCKS COMMUNITY ASSOCIATION INC, AMERANT BANK ACCT. 0106, FROM JANUARY 2021 THROUGH MAY 2021	0.50	145.00
				7,934.40
				7,934.40
EXPENSES				
06/30/2023	EXP	SHAREFILE - JUNE 2023		4.50
06/30/2023	EXP	VALID8 FINANCIAL, INC. - ANNUAL LICENSE UP TO 50K BANK TRANSACTIONS (06/26/23-12/31/23)		25,000.00
				25,004.50
				25,004.50

Discount (17%) (744.50)

Total amount of this invoice \$32,194.40

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company
1100 East Las Olas Blvd.
Fort Lauderdale, FL 33301-2387
Phone: 954-768-4053
Fax: 954-768-4017

Bank ABA Routing: 071000152

Swift Code: CNORUS44

Account Name: KAPILAMUKAMAL, LLP

Account Number: 1171120036



INVOICE

Invoice # 7609
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00993-Gersten

Hammocks - 17-21263-CA (New Penn Financial LLC v. Hammocks.- Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/03/2023	Review plaintiff's notice of filing original note.	0.10	\$400.00	\$40.00
Service	MA	05/04/2023	Review Plaintiff's exhibit list and exhibits.	0.30	\$400.00	\$120.00
Service	MA	05/04/2023	Review email re motion to postpone trial.	0.10	\$400.00	\$40.00
Service	DC	05/09/2023	Review memo and declaration and revise same (.6); follow up with Maia re same (.2).	0.80	\$400.00	\$320.00
Service	MA	05/10/2023	Review emails re whether trial will go forward next week and respond to same.	0.20	\$400.00	\$80.00
Service	MA	05/11/2023	Draft witness and exhibit list.	0.30	\$400.00	\$120.00
Service	VV	05/11/2023	Finalize and e-file Witness and Exhibit List	0.40	\$200.00	\$80.00
Service	DC	05/11/2023	Revise and draft exhibit and witness list and follow up on same with Maia.	0.20	\$400.00	\$80.00
Service	MA	05/12/2023	Send email to counsel re whether trial is going forward next week.	0.10	\$400.00	\$40.00
Service	MA	05/12/2023	Review emails from counsel and respond to same re whether trial is going forward next week.	0.10	\$400.00	\$40.00
Service	MA	05/12/2023	Send update to client re trial.	0.20	\$400.00	\$80.00
Service	MA	05/15/2023	Call and send email to counsel to	0.20	\$400.00	\$80.00

			determine whether the parties settled and if trial will proceed tomorrow.			
Service	MA	05/15/2023	Send email to client (0.1); Review email from Plaintiff's counsel and respond to same (0.1).	0.20	\$400.00	\$80.00
Service	MA	05/15/2023	Prepare outline for examination of witness for Hammocks for trial tomorrow.	0.50	\$400.00	\$200.00
Service	MA	05/15/2023	Confer with counsel for defendant homeowner re trial tomorrow.	0.20	\$400.00	\$80.00
Service	MA	05/15/2023	Send email to R. Stone re financials.	0.10	\$400.00	\$40.00
Service	MA	05/15/2023	Review stipulation for substitution of counsel.	0.10	\$400.00	\$40.00
Service	MA	05/15/2023	Review email from Plaintiff's counsel re trial tomorrow and send email to E. Thompson re same.	0.10	\$400.00	\$40.00
Service	MA	05/15/2023	Review email from client re ledger and respond to same.	0.10	\$400.00	\$40.00
Service	MA	05/15/2023	Send email to R. Stone re ledger for trial tomorrow.	0.10	\$400.00	\$40.00
Service	MA	05/16/2023	Review emails, motion to continue trial, and order granting same (0.2); Send update to E. Thompson (0.1).	0.30	\$400.00	\$120.00
Service	MA	05/17/2023	Review order on substitution of counsel.	0.10	\$400.00	\$40.00

Quantity Subtotal 4.8

Time Keeper	Quantity	Rate	Total
Maia Aron	3.4	\$400.00	\$1,360.00
Darci Cohen	1.0	\$400.00	\$400.00
Viviana Vazquez	0.4	\$200.00	\$80.00

Quantity Total 4.8

Subtotal \$1,840.00

Total \$1,840.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7445	05/31/2023	\$520.00	\$0.00	\$520.00
7280	06/05/2023	\$240.00	\$0.00	\$240.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7609	06/30/2023	\$1,840.00	\$0.00	\$1,840.00
Outstanding Balance				\$2,600.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$2,600.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7608
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00991-Gersten

Hammocks - 20-22065-CA (Toorak Capital Partners LLC v. Hammocks, et. al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	DC	05/01/2023	Revise and draft memorandum of recommendation (3.2); research re waiver of assessments (.4).	3.60	\$400.00	\$1,440.00
Service	MA	05/11/2023	Review Toorak's motion to compel deposition of Biscayne Beach Club's condominium association's representative.	0.10	\$400.00	\$40.00
Service	MA	05/15/2023	Review Plaintiff's motion to compel deposition of defendant Biscayne Beach Club Condo. Assoc.	0.10	\$400.00	\$40.00
Service	VV	05/15/2023	Prepare exhibits for memo.	0.40	\$200.00	\$80.00
Service	MA	05/15/2023	Review and revise memo to client.	0.70	\$400.00	\$280.00
Service	MA	05/15/2023	Review email from client, review memo and notes and respond to same.	0.40	\$400.00	\$160.00
Service	MA	05/16/2023	Review email from client, conduct research and respond to same for three Toorak matters.	0.70	\$400.00	\$280.00
Service	MA	05/18/2023	Review email from Plaintiff re scheduling hearing on motion to compel deposition of other defendant and respond to same.	0.10	\$400.00	\$40.00
Service	MA	05/18/2023	Review Plaintiff's counsel's change of address.	0.10	\$400.00	\$40.00

Service	MA	05/19/2023	Review email from client and respond to same.	0.20	\$400.00	\$80.00
Service	MA	05/21/2023	Review notice of hearing on Plaintiff's motion to compel deposition of Correa.	0.10	\$400.00	\$40.00
Service	MA	05/24/2023	Review notice of hearing on plaintiff's motion to compel deposition.	0.10	\$400.00	\$40.00
Quantity Subtotal						6.6

Time Keeper	Quantity	Rate	Total
Maia Aron	2.6	\$400.00	\$1,040.00
Darci Cohen	3.6	\$400.00	\$1,440.00
Viviana Vazquez	0.4	\$200.00	\$80.00
Quantity Total			6.6
Subtotal			\$2,560.00
Total			\$2,560.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7444	05/31/2023	\$2,760.00	\$0.00	\$2,760.00
7279	06/05/2023	\$320.00	\$0.00	\$320.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7608	06/30/2023	\$2,560.00	\$0.00	\$2,560.00
Outstanding Balance				\$5,640.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$5,640.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7611
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01016-Gersten

Hammocks - 20-25327 (Toorak Capital Partners, LLC v. Hammocks, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/01/2023	Review Toorak's motion to compel deposition of Biscayne Beach Club Condo Assoc.	0.20	\$400.00	\$80.00
Service	MA	05/15/2023	Review and revise memo to client.	0.70	\$400.00	\$280.00
Service	MA	05/16/2023	Review email from client, conduct research and respond to same for three Toorak matters.	0.70	\$400.00	\$280.00
Service	MA	05/19/2023	Review email from client and respond to same (0.1); Send email to defendant's counsel (0.1).	0.20	\$400.00	\$80.00

Quantity Subtotal 1.8

Time Keeper	Quantity	Rate	Total
Maia Aron	1.8	\$400.00	\$720.00

Quantity Total 1.8

Subtotal \$720.00

Total \$720.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7447	05/31/2023	\$3,640.00	\$0.00	\$3,640.00
7284	06/05/2023	\$3,020.00	\$0.00	\$3,020.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7611	06/30/2023	\$720.00	\$0.00	\$720.00
Outstanding Balance				\$7,380.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$7,380.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7612
Date: 06/05/2023
Due On: 08/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01017-Gersten

Hammocks - 20-25383 (Toorak Capital Partners, LLC v. Hammocks, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/15/2023	Review and revise memo to client.	0.70	\$400.00	\$280.00
Service	MA	05/16/2023	Review email from client, conduct research and respond to same for three Toorak matters.	0.70	\$400.00	\$280.00
Service	MA	05/22/2023	Confer with A. Rosenthal re preparing motion to set aside Clerk's default.	0.20	\$400.00	\$80.00
Service	AR	05/22/2023	Conference re: vacating clerk's default; draft and prepare research memorandum re: motion to set aside clerk's default; draft and prepare shell of declaration of client in support of motion	4.80	\$400.00	\$1,920.00
Service	AR	05/23/2023	Draft and prepare research memorandum re: motion to set aside clerk's default; draft and prepare declaration for client in support of motion	1.30	\$400.00	\$520.00

Quantity Subtotal 7.7

Time Keeper	Quantity	Rate	Total
Maia Aron	1.6	\$400.00	\$640.00
Annie Rosenthal	6.1	\$400.00	\$2,440.00

Quantity Total	7.7
Subtotal	\$3,080.00
Total	\$3,080.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7448	05/31/2023	\$1,720.00	\$0.00	\$1,720.00
7285	06/05/2023	\$1,480.00	\$0.00	\$1,480.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7612	08/31/2023	\$3,080.00	\$0.00	\$3,080.00

Outstanding Balance	\$6,280.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$6,280.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 87 days.



INVOICE

Invoice # 7607
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00990-Gersten

Hammocks - 22-12359-CA (HSBC Bank v. Gonsalves, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/04/2023	Review notice of dismissal with prejudice and final disposition form.	0.20	\$400.00	\$80.00
Service	MA	05/10/2023	Review orders entered by Court post-dismissal.	0.10	\$400.00	\$40.00

Quantity Subtotal 0.3

Time Keeper	Quantity	Rate	Total
Maia Aron	0.3	\$400.00	\$120.00

Quantity Total 0.3

Subtotal \$120.00

Total \$120.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7443	05/31/2023	\$480.00	\$0.00	\$480.00
7278	06/05/2023	\$780.00	\$0.00	\$780.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7607	06/30/2023	\$120.00	\$0.00	\$120.00

Outstanding Balance	\$1,380.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$1,380.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7610
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01014-Gersten

Hammocks - 23-000769 (DLJ Mortgage Capital, Inc. v. Hammocks, et al. .-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/01/2023	Review case management order.	0.20	\$400.00	\$80.00
Service	VV	05/05/2023	Review & Cross- Check Admin. Rules from Trial Order dated 04/29/2023	0.60	\$200.00	\$120.00
Service	MA	05/05/2023	Review Plaintiff's witness and exhibit list.	0.20	\$400.00	\$80.00

Quantity Subtotal 1.0

Time Keeper	Quantity	Rate	Total
Maia Aron	0.4	\$400.00	\$160.00
Viviana Vazquez	0.6	\$200.00	\$120.00

Quantity Total 1.0

Subtotal \$280.00

Total \$280.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7446	05/31/2023	\$80.00	\$0.00	\$80.00
7282	06/05/2023	\$2,160.00	\$0.00	\$2,160.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7610	06/30/2023	\$280.00	\$0.00	\$280.00
Outstanding Balance				\$2,520.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$2,520.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7605
Date: 06/05/2023
Due On: 08/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00979-Gersten

Hammocks 17-15701 - (US Bank NA v. Hammocks-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/23/2023	Confer with M. Bernstein in preparation for CMC tomorrow.	0.20	\$400.00	\$80.00
Service	MB	05/23/2023	Meet w/ Maia Aron re hearing prep.	0.10	\$400.00	\$40.00
Service	MB	05/24/2023	Prepare for and cover CMC	0.80	\$400.00	\$320.00
Service	MA	05/24/2023	Attend hearing on Alfaro's motion to withdraw.	0.40	\$400.00	\$160.00
Service	MA	05/24/2023	Send email to E. Thompson re hearing on Alfaro's motion to withdraw today.	0.10	\$400.00	\$40.00
Service	MA	05/24/2023	Review and revise order granting Alfaro's withdrawal and send to Alfaro's office.	0.10	\$400.00	\$40.00

Quantity Subtotal 1.7

Time Keeper	Quantity	Rate	Total
Maia Aron	0.8	\$400.00	\$320.00
Michelle Bernstein	0.9	\$400.00	\$360.00

Quantity Total 1.7

Subtotal \$680.00

Total \$680.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7441	05/31/2023	\$840.00	\$0.00	\$840.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7605	08/30/2023	\$680.00	\$0.00	\$680.00

Outstanding Balance	\$1,520.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$1,520.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 86 days.



INVOICE

Invoice # 7604
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00978-Gersten

Hammocks 17-16946 (MTGLQ Investors LP v. Hammocks.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/01/2023	Attend hearing on Ms. Arriaga's motion to determine priority of liens.	0.20	\$400.00	\$80.00
Service	MA	05/01/2023	Review order sent by Ms. Arriaga's counsel re motion to disburse funds from court registry and respond to same.	0.20	\$400.00	\$80.00
Service	MA	05/04/2023	Review Order Determining Priority of Liens and Authorizing Disbursement of Surplus Funds.	0.10	\$400.00	\$40.00

Quantity Subtotal 0.5

Time Keeper	Quantity	Rate	Total
Maia Aron	0.5	\$400.00	\$200.00

Quantity Total 0.5

Subtotal \$200.00

Total \$200.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7440	05/31/2023	\$600.00	\$0.00	\$600.00
7276	06/05/2023	\$400.00	\$0.00	\$400.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7604	06/30/2023	\$200.00	\$0.00	\$200.00
Outstanding Balance				\$1,200.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$1,200.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7606
Date: 06/05/2023
Due On: 06/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00980-Gersten

Hammocks 21-19372 (Wilmington Savings Fund Society, FSB v. Hammocks.- Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/03/2023	Attend hearing on Plaintiff's motion for writ of possession.	0.20	\$400.00	\$80.00
Service	MA	05/04/2023	Review order for writ of possession.	0.10	\$400.00	\$40.00
Quantity Subtotal						0.3

Time Keeper	Quantity	Rate	Total
Maia Aron	0.3	\$400.00	\$120.00
Quantity Total			0.3
Subtotal			\$120.00
Total			\$120.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7442	05/31/2023	\$40.00	\$0.00	\$40.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7606	06/30/2023	\$120.00	\$0.00	\$120.00
Outstanding Balance				\$160.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$160.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



INVOICE

Invoice # 7603
Date: 06/05/2023
Due On: 08/30/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00975-Gersten

Hammocks 22-3881 (Midfirst Bank v. Flores, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	05/08/2023	Review email from plaintiff's counsel re motion to stay and send email to E. Thompson and R. Stone re same.	0.20	\$400.00	\$80.00
Service	MA	05/19/2023	Review email from Plaintiff's counsel re setting hearing to lift stay in Danton case and send email to client re same.	0.20	\$400.00	\$80.00
Service	MA	05/22/2023	Review email from client and respond to same; Respond to Plaintiff's counsel's email re hearing on motion to lift stay.	0.20	\$400.00	\$80.00
Service	MA	05/23/2023	Confer with L. Lagomasino re motion to lift stay filed by Plaintiff in 22-3881 in Danton case.	0.20	\$400.00	\$80.00
Service	MA	05/25/2023	Review email from plaintiff's counsel re stay in Danton case and send email to L. Lagomasino re same.	0.20	\$400.00	\$80.00
Service	MA	05/31/2023	Review email from Plaintiff's counsel re agreed order re stay and respond to same.	0.10	\$400.00	\$40.00

Quantity Subtotal 1.1

Time Keeper	Quantity	Rate	Total
Maia Aron	1.1	\$400.00	\$440.00

Quantity Total	1.1
Subtotal	\$440.00
Total	\$440.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7439	05/31/2023	\$520.00	\$0.00	\$520.00
7275	06/05/2023	\$600.00	\$0.00	\$600.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7603	08/30/2023	\$440.00	\$0.00	\$440.00

Outstanding Balance	\$1,560.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$1,560.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 86 days.



INVOICE

Invoice # 7815
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00993-Gersten

Hammocks - 17-21263-CA (New Penn Financial LLC v. Hammocks.- Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	06/21/2023	Review emails between plaintiff's and defendant's counsel re loan modification.	0.20	\$400.00	\$80.00
Service	MA	06/26/2023	Review emails from the parties re settlement.	0.20	\$400.00	\$80.00

Quantity Subtotal 0.4

Time Keeper	Quantity	Rate	Total
Maia Aron	0.4	\$400.00	\$160.00

Quantity Total 0.4

Subtotal \$160.00

Total \$160.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7445	05/31/2023	\$520.00	\$0.00	\$520.00
7280	06/05/2023	\$240.00	\$0.00	\$240.00
7609	06/30/2023	\$1,840.00	\$0.00	\$1,840.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7815	07/31/2023	\$160.00	\$0.00	\$160.00

Outstanding Balance	\$2,760.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$2,760.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.



INVOICE

Invoice # 7814
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00991-Gersten

Hammocks - 20-22065-CA (Toorak Capital Partners LLC v. Hammocks, et. al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	06/07/2023	Send email to Condo Assoc.'s counsel.	0.10	\$400.00	\$40.00
Service	MA	06/08/2023	Call and leave message and email counsel for defendant condo association.	0.10	\$400.00	\$40.00
Service	MA	06/08/2023	Review docket and prepare notice of joinder to condo association's motion to vacate final judgment.	0.30	\$400.00	\$120.00
Service	VV	06/09/2023	Finalize and e-file Notice of Joinder	0.40	\$200.00	\$80.00
Service	MA	06/21/2023	Attend hearing on plaintiff's motion to compel deposition of Correa.	0.30	\$400.00	\$120.00
Service	MA	06/26/2023	Review notice of unavailability filed by defendant's counsel.	0.10	\$400.00	\$40.00
Service	MA	06/26/2023	Review order granting plaintiff's motion to compel deposition of Biscayne Beach Club Condo Assoc.'s president Correa.	0.20	\$400.00	\$80.00
Service	MA	06/29/2023	Send email to counsel for condominium association Biscayne Beach Club.	0.10	\$400.00	\$40.00
Service	MA	06/29/2023	Review plaintiff's notice of deposition of Mr. Correa, corporate representative for defendant Biscayne Beach Club.	0.20	\$400.00	\$80.00
Service	MA	06/29/2023	Review Plaintiff's motion to strike	0.90	\$400.00	\$360.00

			Hammocks' joinder, conduct research, and draft opposition to same.			
Service	MA	06/29/2023	Send update to client.	0.20	\$400.00	\$80.00
Service	MA	06/29/2023	Review estoppel letter sent by Plaintiff and compare to ledger.	0.20	\$400.00	\$80.00
Service	MA	06/29/2023	Confer with counsel for defendant Beach Club Condo. Assoc.	0.30	\$400.00	\$120.00
Service	MA	06/30/2023	Review email from client, conduct research re same, and respond to client's email.	0.70	\$400.00	\$280.00

Quantity Subtotal 4.1

Time Keeper	Quantity	Rate	Total
Maia Aron	3.7	\$400.00	\$1,480.00
Viviana Vazquez	0.4	\$200.00	\$80.00
Quantity Total			4.1
Subtotal			\$1,560.00
Total			\$1,560.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7444	05/31/2023	\$2,760.00	\$0.00	\$2,760.00
7279	06/05/2023	\$320.00	\$0.00	\$320.00
7608	06/30/2023	\$2,560.00	\$0.00	\$2,560.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7814	07/31/2023	\$1,560.00	\$0.00	\$1,560.00
Outstanding Balance				\$7,200.00
Amount in Trust				\$0.00

Total Amount Outstanding \$7,200.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.



INVOICE

Invoice # 7817
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01016-Gersten

Hammocks - 20-25327 (Toorak Capital Partners, LLC v. Hammocks, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	06/08/2023	Review docket and prepare notice of joinder to condo association's motion to vacate final judgment.	0.30	\$400.00	\$120.00
Service	VV	06/09/2023	Finalize and e-file Notice of Joinder	0.40	\$200.00	\$80.00
Service	MA	06/26/2023	Review notice of unavailability filed by defendant's counsel.	0.10	\$400.00	\$40.00
Service	MA	06/29/2023	Send update to client.	0.10	\$400.00	\$40.00
Service	MA	06/29/2023	Review estoppel letter sent by Plaintiff and compare to ledger.	0.20	\$400.00	\$80.00

Quantity Subtotal 1.1

Time Keeper	Quantity	Rate	Total
Maia Aron	0.7	\$400.00	\$280.00
Viviana Vazquez	0.4	\$200.00	\$80.00

Quantity Total 1.1

Subtotal \$360.00

Total \$360.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7447	05/31/2023	\$3,640.00	\$0.00	\$3,640.00
7284	06/05/2023	\$3,020.00	\$0.00	\$3,020.00
7611	06/30/2023	\$720.00	\$0.00	\$720.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7817	07/31/2023	\$360.00	\$0.00	\$360.00
Outstanding Balance				\$7,740.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$7,740.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.



INVOICE

Invoice # 7818
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01017-Gersten

Hammocks - 20-25383 (Toorak Capital Partners, LLC v. Hammocks, et al.-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	AR	06/05/2023	Draft and prepare motion to set aside clerk's default	2.70	\$400.00	\$1,080.00
Service	MA	06/08/2023	Confer with counsel for condo assoc.	0.20	\$400.00	\$80.00
Service	MA	06/08/2023	Review docket and prepare notice of joinder to condo association's motion to vacate final judgment.	0.30	\$400.00	\$120.00
Service	VV	06/09/2023	Finalize and e-file Notice of Joinder	0.40	\$200.00	\$80.00
Service	MA	06/26/2023	Review notice of unavailability filed by defendant's counsel.	0.10	\$400.00	\$40.00
Service	MA	06/29/2023	Send update to client.	0.10	\$400.00	\$40.00
Service	MA	06/29/2023	Review estoppel letter sent by Plaintiff and compare to ledger.	0.20	\$400.00	\$80.00
Quantity Subtotal						4.0

Time Keeper	Quantity	Rate	Total
Maia Aron	0.9	\$400.00	\$360.00
Annie Rosenthal	2.7	\$400.00	\$1,080.00
Viviana Vazquez	0.4	\$200.00	\$80.00

Quantity Total	4.0
Subtotal	\$1,520.00
Total	\$1,520.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7448	05/31/2023	\$1,720.00	\$0.00	\$1,720.00
7285	06/05/2023	\$1,480.00	\$0.00	\$1,480.00
7612	08/31/2023	\$3,080.00	\$0.00	\$3,080.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7818	07/31/2023	\$1,520.00	\$0.00	\$1,520.00
Outstanding Balance				\$7,800.00
Amount in Trust				\$0.00
Total Amount Outstanding				\$7,800.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.



INVOICE

Invoice # 7816
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

01014-Gersten

Hammocks - 23-000769 (DLJ Mortgage Capital, Inc. v. Hammocks, et al. .-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	06/12/2023	Review notice of hearing on motion for summary judgment.	0.10	\$400.00	\$40.00
Service	MA	06/23/2023	Review defendant's suggestion of bankruptcy.	0.10	\$400.00	\$40.00

Quantity Subtotal 0.2

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00

Quantity Total 0.2

Subtotal \$80.00

Total \$80.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7446	05/31/2023	\$80.00	\$0.00	\$80.00
7282	06/05/2023	\$2,160.00	\$0.00	\$2,160.00
7610	06/30/2023	\$280.00	\$0.00	\$280.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7816	07/31/2023	\$80.00	\$0.00	\$80.00

Outstanding Balance	\$2,600.00
Amount in Trust	\$0.00
Total Amount Outstanding	\$2,600.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.



INVOICE

Invoice # 7813
Date: 07/07/2023
Due On: 07/31/2023

Mark Migdal & Hayden

80 SW 8th Street, Suite 1999
Miami, Florida 33130
United States

David Gersten

US

00979-Gersten

Hammocks 17-15701 (US Bank NA v. Hammocks-Bank Forcl)

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	06/08/2023	Review order granting Alfaro's motion to withdraw.	0.10	\$400.00	\$40.00
Service	MA	06/08/2023	Review Order directing Clerk to issue certificate of title.	0.10	\$400.00	\$40.00
Quantity Subtotal						0.2

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
Quantity Total			0.2
Subtotal			\$80.00
Total			\$80.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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7441	05/31/2023	\$840.00	\$0.00	\$840.00
7605	08/30/2023	\$680.00	\$0.00	\$680.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7813	07/31/2023	\$80.00	\$0.00	\$80.00
			Outstanding Balance	\$1,600.00
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$1,600.00

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 24 days.