

IN THE CIRCUIT COURT FOR THE 11<sup>th</sup>  
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.

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**RECEIVER’S: 1) FIFTH SUPPLEMENTAL REPORT FOR THE PERIOD JULY  
18, 2023 THROUGH OCTOBER 16, 2023; AND, 2) SEVENTH INTERIM  
APPLICATION FOR ORDER AUTHORIZING PAYMENT OF FEES AND  
EXPENSES AND FOR AUTHORIZATION TO DISTRIBUTE FUNDS  
PURSUANT TO THIS COURT’S APPOINTMENT ORDER**

The Honorable David M. Gersten (Retired), the court-appointed Receiver (the “Receiver”), submits his Fifth Supplemental Report setting forth his activities and efforts to fulfill his court-appointed duties for the period from July 18, 2023 through October 16, 2023<sup>1</sup>, together with his request for authorization for payment of various interim professional fees, including forensic accountants, and expenses for the three-month period from July 1, 2023 through September 30, 2023.

<sup>1</sup> 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, his May 4, 2023 Third Supplemental Report for the Period March 28, 2023 Through May 4, 2023, and his July 17, 2023 Fourth Supplemental Report for the Period May 5, 2023 Through July 17, 2023.

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**I.**  
**RECEIVER’S FIFTH SUPPLEMENTAL REPORT**

**A.**  
**INTRODUCTION**

The transition from a receivership to a completely independent, self-governed, and legitimate Association marches on. Since the Receiver’s last Report, he and his team have made tremendous progress in ensuring that sufficient resources (financial, operational, and legal) are available to the Association so that a proper and stable changeover can be completed as soon as practicable.

To that end, the Receiver and his legal team recently: 1) recovered **\$2,000,000.00** from the Association’s Directors and Officers Liability (“D&O”) insurer as a result of a lawsuit that the Receiver filed against former non-arrested Board members; and, 2) reached agreement for the payment to the Association of **another \$300,000.00** (subject to this Court’s approval) to resolve a lawsuit filed by the Receiver against former Association attorneys Alfaro & Fernandez, P.A., Elbert Radames Alfaro Beita, Esq. and Yudany Fernandez, Esq. (collectively, the “Alfaro Attorneys”).

In addition, during the current reporting period the Receiver and his team:

identified a lock box at Popular Bank containing over \$190,000.00 (which was maintained by the prior Board to receive assessment payments) and utilized a portion of those funds to pay off the Association’s outstanding loan taken out by the previous Board with that bank;

continued to push the Association’s Crime policy insurer for the payment of the \$1 million limits under that policy, including by filing a Civil Remedy Notice and readying a lawsuit against that insurer, and (through the efforts of the forensic accountants retained by the Receiver) identified in excess of \$500,000.00 of additional damages to bolster the Association’s claim under that policy;

continued to aggressively litigate lawsuits filed against the Association’s prior attorneys, one of which cases is set for mediation this week;

prepared and made available to all Association homeowner members a proposed budget through 2024, which budget will be finalized and approved next month;

implemented a collections procedure for the approximate \$1,750,000.00 in unpaid assessments that were due and owing to the Association at the time of the Receiver's last Report to this Court, substantially reducing that balance;

continued their efforts to secure a partial appellate reversal of an over \$250,000.00 judgment obtained by two (2) homeowners against the Association (and former Board member Marglli Gallego ("Gallego"));

at a time when nearly everyone's insurance rates are increasing (and drastically), cut the Association's annual insurance premiums by over \$200,000.00, which monies can now be allocated to other of the Association's many needs;

sold the Association's remaining unneeded vehicles, using a portion of those sales proceeds to pay off the loans that the prior Board took out to purchase many of those vehicles, thereby eliminating another liability from the Association's books and reducing the Association's significant insurance costs; and,

continued analyzing the Association's business records to identify additional potentially recoverable monies (and sources thereof) in order to retrieve data necessary to prepare the Association's audited financial statements for 2019 through 2022 (which has been nearly completed).

**B.**  
**THE RECEIVER'S ACTIVITIES AND EFFORTS FOR**  
**THE PERIOD JULY 18, 2023 THROUGH OCTOBER 16, 2023**  
**AND ACTION PLAN MOVING FORWARD**

**1.**  
**Solidifying the Association's Governance**

The Advisory Board recently completed its sixth month of service and numerous of the Association's committees are well underway, conducting regular publicly noticed meetings<sup>2</sup>, setting their respective agendas, and making recommendations to the Receiver.

In addition, the Receiver has continued to delegate numerous matters to the Association's committees, including requesting their analysis regarding: 1) his recommendation to utilize the \$2

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<sup>2</sup> The Receiver notes that one committee, the Governing Documents Committee (chaired by Advisory Board member Carlos Villalobos), held a series of **non-public, secret meetings**. Mr. Villalobos was publicly reprimanded on the Association's website and admonished for holding **secret meetings**.

million recovery recently obtained from the Association's D&O carrier to establish a capital improvements reserve account (to obviate the need for any special assessments in the future to repair or replace the Association's future capital improvements); 2) his recommendation to conduct the next Board election in February 2024 (as is provided for in the Association's governing documents) and, at that time, reconstitute all of the Association's committees; 3) his recommendation to obtain a proposal to retain an arborist to conduct a tree study and replacement plan for the many trees in the community that have run their life cycle; 4) his recommendation to advise on the need of additional outside security personnel; and, 5) his recommendation to consider the property manager, property manager FirstService Residential's ("Property Manager") suggested, detailed procedure for the Fining Committee's hearings.

The Receiver also worked closely with the Architectural Control Committee ("ACC") to address requests by homeowners for approval of work that does not comply with the Association's current regulations but for which those homeowners had already made an initial investment (in reliance on the prior Board's approval of similar, yet non-compliant work for other homeowners). Most notably, that work entailed the installation of metal roofs (which were not Association approved) as well as other roofing materials in non-compliant colors. To reach an equitable resolution, the ACC has recommended (and the Receiver has approved) revised regulations that will permit those homeowners to proceed with the requested work so that they do not suffer a financial hardship (while also maintaining a consistent aesthetic standard for the community).

In response to a request by the Advisory Board President, Don Kearns, the Receiver has recently established a new committee: the Safety Committee. This new Committee is to address security issues (including gang activity) that have been plaguing the Association since the days of the prior Board.

**a.**

**Snuffing Out Remnants of the Prior Board's Tactics**

Unfortunately, and although all committee meetings are to be noticed and open to all of the Association's members, one of the Association's committees (the Governing Documents Committee, chaired by Advisory Board member Carlos Villalobos) conducted **secret meetings** that were not disclosed, noticed or otherwise open to all of the Association's members.

Those meetings occurred in spite of the Receiver advising Mr. Villalobos that all meetings required the attendance of the Advisory Board attorney and the minutes were to be recorded by the Property Manager.

Upon the extreme violation of the Association's rules and regulations being brought to the Receiver's attention, and with the full support of all disinterested Advisory Board members, the Receiver took prompt corrective action, issuing a Notice of Violation against Mr. Villalobos. The Receiver made clear to that member and all homeowners that **clandestine meetings**, which were a "**calling card**" of the prior Board, will **not be tolerated**.

**2.**

**Clawing Back Association Monies**

**a.**

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

**i.**

**A \$2 Million Recovery for the Association**

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. As a result of those breaches, the Receiver made a demand upon the Association's D&O insurer for that policy's \$2,000,000.00 policy limits. The Receiver's legal team's aggressive prosecution of those claims and unflinching stance with the D&O insurer paid off: last month, the D&O insurer agreed

to pay the policy limits to the Association. The total legal fees incurred by the Receiver's legal team in obtaining that \$2,000,000.00 recovery totaled less than \$100,000.00, or less than 5% of the recovery.

**ii.**

**Claims Against the Association's Prior Attorneys: Another \$300,000.00 Recovery**

As discussed in his prior Reports, the Receiver has filed lawsuits against: 1) two (2) sets of the Association's prior attorneys, to wit, Rasco Klock Perez & Nieto, P.L., Hilton Napoleon, II, P.A., and Hilton Napoleon II (collectively, the "Rasco Attorneys") and the Alfaro Attorneys; and, 2) Gallego's personal criminal attorneys, who received over \$870,000.00 of Association monies, to wit, Hermida Law Firm, LLC, Quintero Broche, P.A., and Jose M. Quinon, P.A. (collectively, the "Hermida Attorneys") and Jauregui Law, P.A. and Sabino Jauregui, Esq. (collectively, the "Jauregui Attorneys").

The Receiver's legal team has aggressively litigated those lawsuits, which have resulted in two (2) early mediations. In one of those mediations, in the lawsuit filed against the Alfaro Attorneys, the Receiver recently reached an agreement to resolve for **\$300,000.00**, which amounted to the limits of the Alfaro Attorneys' malpractice insurance. That settlement is contingent upon (and has been submitted for) this Court's approval.

In the lawsuit filed against the Jauregui Attorneys, mediation is scheduled for tomorrow, October 17<sup>th</sup>.

**iii.**

**The Receiver's Claim Against the Association's Crime Insurer**

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



("Forensic Accountants") as fraudulent, subject to the Crime policy's \$1 million policy limits. As discussed below, due to additional analysis by Forensic Accountants, the Receiver will be able to increase that Proof of Loss by over \$500,000.00.

Despite months of delay, the Association's Crime policy carrier has neither agreed to pay that policy's limits nor even made a determination of coverage.

Accordingly, the Receiver's legal team recently filed a Civil Remedy Notice against that carrier; if the policy limits are not paid within sixty (60) days of that Notice, and subject to a court determination that there is coverage for the Association's claim under that policy, the policy limits will be uncapped and the Association could potentially recover more than policy limits.

In addition, as the Crime policy carrier has continued to refuse to pay the policy limits despite the Receiver's legal team recently providing the carrier with one last opportunity to do so, this week the Receiver will be filing a lawsuit for breach of contract against that carrier.

**b.**

**The Sale of Unnecessary Vehicles**

The Receiver's team recently completed the sale of the Association's remaining unneeded vehicles to CarMax for \$112,000.00. The Receiver utilized a portion of those monies to fully satisfy the loans that the prior Board took out to purchase many of those vehicles. These completed sales resulted in net proceeds to the Association of \$23,741.51.

**c.**

**The Receiver's Team Secures Substantial Insurance Savings for the Association**

By eliminating the aforementioned vehicles (together with the other unneeded vehicles previously sold by the Receiver) from the Association's automobile liability policy, the Receiver's team was able to **reduce** the Association's automobile policy premiums by \$114,798.44 a (78% savings). The Receiver's team also **reduced** the Association's D&O, Property, and Wind

insurance premiums by a combined total of \$90,572.12 (a 40% savings). In all, at a time when virtually every Florida resident's insurance premiums are substantially increasing, the Receiver's team **reduced** the Association's insurance premiums by \$200,401.02 (a 37% reduction). These insurance policy savings will be utilized by the Association to offset other costs.

**d.**  
**Recovering Unpaid Assessments**

Around the time of the Receiver's prior Report, the unpaid assessments due to the Association totaled approximately **\$1,750,000.00**.

To bring those much-needed monies into the Association (as well as to correct any errors in the account information inherited from the prior regime), in August, Property Manager (under the direction of the Receiver) sent letters to each delinquent homeowner: 1) enclosing a copy of their account ledger and requesting that they contact Property Manager if there were any errors in that ledger; and, 2) advising that if Property Manager was not notified of any such errors, and for all homeowners whose accounts were at least \$400.00 in arrears, Property Manager would be sending a statutory Notice of Late Assessment ("NOLA"). After they receive the NOLA, the homeowner would have a certain period of time to bring their account current and, if they failed to do so, their account would be sent to collections.

**i.**  
**Resultant Progress in Recovering Unpaid Assessments**

Those efforts bore fruit. A month later, the balance of unpaid assessments decreased by over \$500,000.00 (over 30%). Yet, because many accounts remain delinquent by at least \$400.00, this week Property Manager sent NOLAs to the applicable homeowners. The Receiver and his team will continue to aggressively pursue all unpaid assessments (making exceptions, of course, for those homeowners who can show an undue hardship).

**ii.**  
**Other Collection Efforts**

In addition to the Receiver's efforts to collect unpaid assessments, the Receiver's legal team continues to work through the approximate 40 active foreclosure lawsuits involving the Association. The Receiver's legal team has recently resolved many of those lawsuits and will continue to work to expeditiously resolve the remainder to obtain additional recoveries (and reduce attorneys' fees) for the Association.

**3.**  
**The Forensic Accountants Continue to Assist Recovery Efforts and Set the Stage for the Preparation of Long Overdue Audited Financial Statements**

During the current reporting period, Forensic Accountants continued to investigate the bank records of certain board members and their related parties to trace funds from the Association and identified over \$500,000.00 of additional monies from the Association that were deposited into the accounts of related parties/insider entities. Most of this bank activity appears personal in nature and demonstrates that the parties/insiders/entities were not actual operating businesses. Instead, these parties/insiders/entities were merely used to funnel monies from the Association to fraudulent purposes.

Based upon this newly-discovered information, the Receiver will be increasing his Proof of Loss to the Association's Crime policy carrier (to approximately \$4,000,000.00).

**a.**  
**The Association's Bank Accounts and Financial Statements**

The balance of the Association's bank accounts as of October 13, 2023 totaled \$3,474,220.32, more particularly as follows: 1) \$3,473,410.24 in accounts at City National Bank; and, 2) \$810.08 in an account at Truist Bank.

As addressed in the Receiver's prior Reports, Forensic Accountants must reconstruct the Association's financial activity for the years 2019 through 2022 (in about twenty Association bank accounts) so that accurate financial statements for those years can be prepared.<sup>3</sup> Forensic Accountants have nearly completed this painstakingly detailed task.

As a result, the Receiver's team is retaining an independent certified public accountant specializing in homeowners' associations to prepare the Association's audited financial statements and an additional and independent firm to prepare the statutorily required audits and tax filings for the years 2019 through 2022.

#### **4.** **Missing Association Monies Are Located**

Unbeknownst to the Receiver and his team at the time of his prior Report, the bank accounts previously identified were not the only monies maintained by the prior Board in a banking institution. In August, the Receiver's legal team identified a lock box at Popular Bank that was set up by the prior Board to receive assessment payments (and was used by the prior Board to make payments on the Popular Bank loan<sup>4</sup> discussed in the Receiver's prior Reports). In total, the Receiver's legal team identified **over \$190,000.00** in payments made to that lock box (for dues dating back to October 2022).

Property Manager promptly updated all applicable homeowners' accounts to reflect those newly-discovered payments. The Receiver used a portion of those monies to pay off the Popular Bank loan, wiping another liability off of the Association's books, and **deposited** the remaining amount of **\$133,500.00** into the Association's primary account (at City National Bank).

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<sup>3</sup> These audited financial statements were never prepared by the previous Board.

<sup>4</sup> At the time the Receiver was appointed, that loan had an outstanding balance of \$435,547.67.

**5.**  
**The Association's Business Operations**

**a.**  
**A New, Comprehensive Budget Nears Adoption**

The Receiver and his team have worked with Property Manager to prepare a detailed, proposed budget for the Association (through the end of 2024). A preliminary draft of that budget has been completed and was provided to the Advisory Board, the Finance Committee and all homeowners for their questions and comments prior to adoption.

On September 27<sup>th</sup>, the Finance Committee conducted a publicly noticed meeting during which the Committee and homeowners had the opportunity to pose any questions that they had about and provide their comments to the budget. The Receiver's team has answered those questions – making the answers publicly available on the Association's website (<https://www.hammockscommunityassociation.info/>) – and has made certain revisions to the proposed budget based upon comments received, as appropriate.

Another Finance Committee meeting is being conducted this week (on October 18<sup>th</sup>), during which the Committee and homeowners will have yet another opportunity to pose questions about and make comments on the proposed budget for further consideration by the Receiver.

Without contention, this will be the Association's most transparent budget review and approval process in recent memory. This transparency is critical to the homeowners and the Receiver.

A final budget will be adopted by no later than November 15<sup>th</sup>. Once adopted, the Association will (for the first time in many years) have a true “balanced budget” that is designed to meet the needs of the Association - not the personal needs of the unscrupulous prior Board - while keeping costs (including assessments) as low as possible.

Based upon this new finalized budget, the homeowners' assessments will go down in 2024 and there will be no need for special assessments.

**b.**  
**Property Manager's Continued Operation**  
**of the Association, Under the Direction of the Receiver**

During the period from July 14, 2023 through October 13, 2023, Property Manager collected \$2,698,318.68 in assessments from homeowners, together with \$14,200.00 in boat storage fees.

Property Manager also caused to be paid, under the direction of the Receiver, \$2,209,777.86 in Association expenses, including, but not limited to: 1) the Association's professionals and vendors, to wit: landscape vendor Turf, security vendor Elite, Property Manager, pool cleaning vendor Florida's Bright & Blue Pools & Beach Service, lake cleaning vendor The Lake Doctors, Inc., and gym vendor The Fitness Solution; 2) permitting fees/expenses; 3) waste collection; 4) insurance premiums; 5) utilities; and, 6) 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"), Michael S. Kaufman, Esq., and SBK Legal, Forensic Accountants, and Mark Migdal & Hayden ("Outside Counsel") for the time period from March 16, 2023 through June 30, 2023 (pursuant to the Court's July 6, 2023 and August 18, 2023 Orders permitting the payment of those fees).<sup>5</sup>

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

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<sup>5</sup> Those fees totaled \$850,558.00.

continued to reconcile homeowners' accounts, which efforts were complicated by incomplete and/or unreliable information ineptly maintained by the prior Board;

in response to homeowner concerns regarding non-functioning lighting throughout the community (a problem that existed under the prior Board), determined that the light fixtures (rather than the light poles in their entirety) need to be replaced and obtained proposals for that work (for the Receiver's consideration);

in response to homeowner concerns that the Association's drains would fail in the event of a hurricane, a) retained an inspector to inspect all Association drains for collapse, which drains were determined to be free of any structural issues, b) scheduled the jet cleaning of those drains, and, c) directed the Association's maintenance personnel to remedy any issues of standing water in drains throughout the community;

obtained proposals for the removal of dead trees and related debris throughout the community;

continued to identify active liens filed by the prior Board that have been satisfied by homeowners (so that the Receiver can file Releases of those liens); and,

continued to work to rectify pre-receivership permit issues and code violations at the three Association pools, which pools were inoperable due to neglect by the prior Board (including unperformed code compliance work). One of those pools has now reopened; the other two will soon be opened.

**6.**  
**The Cepero Appeal:**  
**Fighting to Secure the Association's Recent Victory**

As discussed in his prior Report, 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 its 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. 21-cv-22821-RKA. That Judgment was for damages claimed by homeowners Josue Cepero and Leticia Cepero (the "Ceperos") primarily 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.

Following the Receiver's prior Report to this Court, the appellate court issued its Judgment on the Opinion and Order; however, that Judgment, unlike the Opinion and Order, limited its reversal to only the punitive damages awarded against the Association, which damages total \$126,718.80 (not the entire judgment amount of \$253,437.60), and remanded the matter back to the Bankruptcy Court for further proceedings consistent with the Opinion and Order. In light of the discrepancy between the Opinion and the Judgment, the Receiver filed a motion to alter that Judgment (to comport with the Opinion) or for clarification; simultaneously, the Ceperos filed a motion challenging the appellate court's ability to enter the Judgment.

On August 17, 2023, the appellate court issued its Order on the parties' respective motions together with its Amended Judgment, the latter of which again limited its reversal to the punitive damages awarded against the Association and remanded the matter to the Bankruptcy Court. The Receiver anticipates that the Ceperos will continue to attempt to dispute the finding that the Association is not liable to them for punitive damages by further litigating the issue in the



Bankruptcy Court. A status conference has been scheduled in the Bankruptcy Court for October 31, 2023.

As discussed in the Receiver's Report, the Ceperos have filed a duplicative state court lawsuit against the Association (together with Gallego and two (2) former Hammocks security guards), Case No. 2023-016302-CA-01, pending before Judge Antonio Arzola. On June 19<sup>th</sup>, the Association filed its Motion to Dismiss that lawsuit; that Motion was granted as the Ceperos failed to seek leave of this Court before proceeding with that lawsuit. Subsequently, this Court granted the Ceperos relief from the Receivership stay to proceed with that lawsuit, and the Ceperos filed an Amended Complaint. The Receiver has filed a Motion to Dismiss the Amended Complaint, which Motion has not yet been set for hearing.

### **C.** **CONCLUSION**

The scope of the Receiver's remaining action items continues to narrow as the Association's advisory governing bodies establish their foothold, the operational needs of the Association are addressed, and the Receiver and his legal team reclaim pilfered Association monies. The Receiver's goal: with the next Board election, the Association will elect an independent Board. Shortly after the newly-elected Board holds its first meeting, if appropriate, the receivership, with the permission of this Court, could be limited to correct the oversight and remaining needed fiduciary work prior to final transition back to the homeowners.

## **II.** **RECEIVER'S SEVENTH 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) 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, 3) retained outside counsel to represent the Association in certain pending bank foreclosure cases filed against the Association (“Outside Counsel”).

The fees incurred by the Receiver’s office, Lead Counsel, Advisory Board Counsel, and Outside Counsel, and the fees for the Association’s Forensic Accountants, are reflected on the invoices attached hereto as **Composite Exhibit 1** and reflect the time entries and work performed by the Receiver and his professionals for the benefit of the Association during the Application Period (July 1, 2023 through September 30, 2023) as well as the **Receiver’s reductions** thereto, as applicable.

As reflected in Composite Exhibit 1, during the Application Period: 1) the Receiver’s office incurred fees in the amount of \$200,240.00, which the Receiver has reduced by 5% to \$190,228.00, and costs in the amount of \$175.11, for a total of \$190,403.11; 2) Lead Counsel has incurred fees in the amount of \$194,205.00, which the Receiver reduced by 5% to \$184,494.75 and costs in the amount of \$1,740.95, for a total of \$186,235.70; 3) Advisory Board Counsel incurred fees in the amount of \$65,950.00, which the Receiver has reduced by 5% to \$62,652.50, and costs in the amount of \$499.91, for a total of \$63,152.41; 4) Forensic Accountants incurred fees in the amount of \$75,960.60, which Forensic Accountants reduced by 17%<sup>6</sup> to \$64,745.60, and costs in the amount of \$6,051.22, for a total of \$70,796.82; and, 5) Outside Counsel incurred fees in the amount of \$4,600.00.

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<sup>6</sup> Forensic Accountants’ discount relates to all staff rates except partners.

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 \$515,188.04.

### 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 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 Board Counsel, Outside Counsel, and/or Forensic Accountants 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 Board Counsel, Outside Counsel, or Forensic Accountants, as applicable, by the third-party vendor and paid by me, Lead Counsel, Advisory Board Counsel, Outside Counsel, and/or Forensic Accountants, as applicable, to such vendor. To the extent that such services were performed by me as Receiver, Lead Counsel, Advisory Board Counsel,

Outside Counsel, and/or Forensic Accountants, I certify that I, Lead Counsel, Advisory Board Counsel, Outside Counsel, and/or Forensic Accountants, 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 \$190,403.11, to Lead Counsel of \$186,235.70, to Advisory Board Counsel of \$63,152.41, to Forensic Accountants of \$70,796.82, and to Outside Counsel of \$4,600.00, incurred during the Application Period (July 1, 2023 through September 30, 2023) ; and (2) granting such further relief as the Court deems just and proper.

Respectfully submitted this 16<sup>th</sup> day of October, 2023.

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[kmurena@dvllp.com](mailto:kmurena@dvllp.com)  
[rlandy@dvllp.com](mailto:rlandy@dvllp.com)

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served through the Florida Court's E-Filing system upon all Counsel of Record, this 16<sup>th</sup> day of October 2023.

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

COMPOSITE  
EXHIBIT 1

**GORDON&REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER®**  
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

August 18, 2023  
ID: GERSP 1292668  
Invoice No. 21387877  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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**BILLING SUMMARY THROUGH July 31, 2023**

Fees For Professional Services:	\$68,605.00
LESS DISCOUNT	-\$5,488.40
Total for Professional Services:	\$63,116.60
Expenses and Advances:	<u>\$71.04</u>
<b>Current Bill:</b>	<b>\$63,187.64</b>

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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>
07/01/23	Review and respond to Russell Landy email re: Alfaro .1; review and respond to Jesmany Jomarron email re: Ms. K. Johnson .1; review and respond to Russell Lady email re: conference .1	DMG2	0.30
07/02/23	Conference with Russell Landy re: Alfaro and equipment issue .4; review and approval bill payments through Avid .2	DMG2	0.60
07/03/23	Review and forward Corey Tickner email to Eric Thompson re: agenda .1; review and respond to Eric Thompson email re: appeal and judge assigned .1; review Corey Tickner email with budget timeline .1; review and respond to Chicky Ardisson email re: ACC meeting .1; review and respond to Jesmany Jomarron email re: CPA and budget timeline; review and respond to Corey Tickner email re: calls/emails at clubhouse .1	DMG2	0.50
07/03/23	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
07/03/23	Continue drafting Motion for Final Summary Judgment (continue drafting the following section: 1) Argument, pp. 10-30)	ERT	8.10
07/04/23	Review and pay bills through Avid .2	DMG2	0.20
07/04/23	(Martinez) emails to and from FSN regarding release of lien; review estoppel certificate and related docs	LML3	0.30
07/04/23	Draft objections to Plaintiff's discovery	LML3	0.60
07/04/23	Email to opposing counsel attaching objections to discovery	LML3	0.20
07/05/23	Review and respond to Melissa Vasquez email re: committee pages for website .1; review and respond to Corey Tickner email string with Carlos Villalobos re: registry .1; review and respond Eric Thompson email with proposed motion to transfer re: Cepero .2; review and forward email from ATT re: internet contract .2; email to Melanie Damian re: ATT contract .1; conference with Jesmany Jonmarron re: board issues .5; review and respond to Melanie Damian email re: PPP loan issue .1; review and respond to Melanie Damian email re: filing status re: tax issue .1; review email from ATT re: contract .2; review and respond to Jesmany Jomarron email re: IT set-up and billing .2	DMG2	1.80

07/05/23	Email correspondence with independent counsel (Kennth Murena, Esq.) attaching and regarding Motion to Transfer Case to the Honorable Robert N. Scola, Jr. (Appeal Case No. 1:23-CV-21612-RNS) or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-DPG) (for his review and approval), including his comments to same	ERT	0.10
07/05/23	Email correspondence with Appellants' counsel (Michael Brook, Esq.) inquiring as to whether he has any objection to the relief requested in our impending Motion to Transfer Case to the Honorable Robert N. Scola, Jr. (Appeal Case No. 1:23-CV-21612-RNS) or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-DPG) (as required by Court's Rules prior to filing said Motion), including his response to same	ERT	0.20
07/05/23	Draft Motion to Transfer Case to the Honorable Robert N. Scola, Jr. (Appeal Case No. 1:23-CV-21612-RNS) or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-DPG), 8 pages	ERT	2.10
07/06/23	Review and respond to Jesmany Jomarron email re: ACC zoom meeting .1; revel and respond to Corey Tickner email re: agenda .1; review and respond to Corey Tickner email re: AC replacement and review attached proposals for replace/repair .2; review and respond to Melissa Vasquez email re: Pavon matter .1; review and respond to Danilo Baptiste email re: IT set-up .1; review Michael Kaufman email with bill attached and review bill and email re: deductions to Melanie Damian .3; conference with Eric Thompson re: Cepero case .2; review and respond to Leo Lagamasino email re: payments .1; review email re: Avid billing and payments .2; review and respond to email from Eric Thompson with case for review re: Sarmina .2	DMG2	1.60
07/06/23	(Martinez) follow up emails to and from FSN regarding release of lien; draft release of lien and follow up re recording of same; forward copy to FSN	LML3	0.80
07/06/23	Analyze Florida case law addressing effect of determination that a contract is voidable, generally and, in particular, due to conflicts of interest, including the enforcement of a contract that has been rescinded due to voidability (in preparation for tomorrow's telephone call 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 potential settlement)	ERT	0.80

07/06/23	Telephone conference with D. Gersten to discuss strategy for tomorrow's telephone call 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 potential settlement	ERT	0.20
07/07/23	Review and respond to Jesmany Jomarron email re: IT .1; review and respond to Jesmany Jomarron email re: Alfaro issue .1; review and respond to Adriana Pavon email with signed release .1; email to Melissa Vasquez re: closeout storage space successfully .1; review and respond to Adriana Pavon email re: car sales .1; conference with Robert Kelley and Eric Thompson re: case settlement .5; conferenevc with Eric Thompson re: settlement discussions .2; review and respond to Don Kearns email re: car thefts .1; review order from federal court re : Cepero transfer order .1; review and respond to Russell Landy email re: minutes to meeting .1	DMG2	1.50
07/07/23	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, and D. Gersten regarding potentially resolving case	ERT	0.50
07/07/23	Telephone conference with D. Gersten to discuss strategy going forward following today's 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	0.20
07/10/23	Review and respond to Eric Thompson email with draft motion re: appeal .3; review and respond to Adriana Pavon email re: vehicle sale .1; review and respond to Eric Thompson email re: sale of cars and power of attorney .1; review and respond to Danilo email re: IT issues 1; review and respond to Eric Thompson email re: Cortland issue .1; review and respond to Eric Thompson email re: Toorak case .1; review and respond to Eric Thompson email reL Cepero briefing .1; review and respond to Adam Ruff email re: filing of motion .1; conference with Eric Thompson re: upcoming strategic conference re: Toorak cases and upcoming AB meeting for tomorrow .3; review and respond to Adam Ruff email re: new lawsuit .1; review and respond to Corey Tickner email re: meeting re: contracts .1; review and respond to Corey Tickner email re: towing company and attached contract .1; review and respond to Corey Tickner email re: boat storage and paid/unpaid tenants .1; review Corey Ticketing email with 4 weeks worth of reports of activity performed .4; review and respond to Corey Ticktin email with proposals for pool pumps .1; review and respond to Russell Landy email with Rasco Clock law firm motions/responses and review same	DMG2	2.80

re: lawsuit against Rasco Clock .3; review Russell Landy email and documents re: Hilton Napoleon motion to dismiss and opposition to transfer .3

07/10/23	Draft Motion to Stay Briefing or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-RNS), 5 pages	ERT	0.60
07/10/23	Telephone conference with D. Gersten 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)	ERT	0.30
07/10/23	Revise, in accordance with comments by independent counsel (Kenneth Murena, Esq.), Motion to Stay Briefing or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-RNS)	ERT	0.10
07/10/23	Analyze Architectural Control Applications (2) by owner SW 104th FL Partners LLC and prepare corresponding Determination Forms	ERT	0.20
07/10/23	Email correspondence with D. Gersten and independent counsel (Adriana Pavon, Esq.) regarding Association dues refund requested by Nelly G Arriaga (15581 SW 112th Drive, Miami FL 33196 Nelly G Arriaga) due to Ms. Arriaga's prior payment of subject dues to Alfaro & Fernandez	ERT	0.30
07/10/23	Analyze and revise Power of Attorney to be used by FirstService Residential in connection with sale of unnecessary Association vehicles to AutoNation, 2 pages	ERT	0.20
07/10/23	Email correspondence with Appellants' counsel (Michael Brook, Esq.) inquiring as to whether he has any objection to the relief requested in our impending Motion to Stay Briefing or, Alternatively, Motion for Extension of Time to File Answer Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal Case No. 23-cv-21795-RNS), including his response to same	ERT	0.20
07/10/23	Analyze all email correspondence from 5/4/23 through the present regarding action items being handled by FirstService Residential (in furtherance of drafting Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders, as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	1.30

07/11/23	Review and respond to Corey Tickner email re: logs .1; review and respond to Eric Thompson email re: settlement language re: payment date and other issues .1; review and respond to Corey Tickner email re: pools repairs and county inspections .1; conference with Eric Thompson re: tonight's meeting re: receiver's report .4; review and respond to Carlos Villalobos email re: items on agenda .1; attend regularly scheduled advisory board/homeowner meeting 2.3; review and respond to Eric Thompson/Melanie Damian email re: proposed settlement agreement .1	DMG2	3.20
07/11/23	Telephone conference with D. Gersten regarding (including his comments to) draft outline of items for the Receiver's Report and items of new business (to be discussed during tonight's Board meeting)	ERT	0.40
07/11/23	Telephone conference with independent counsel (Russell Landy, Esq.) regarding additional information need to draft outline of items for the Receiver's Report and items of new business (to be discussed during tonight's Board meeting)	ERT	0.10
07/11/23	Telephone conference with outside counsel (Maia Aron, 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)	ERT	0.30
07/11/23	Revise, in accordance with comments by D. Gersten, Settlement Agreement and Mutual Release (for the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05)	ERT	0.20
07/11/23	Draft Settlement Agreement and Mutual Release (for the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05), 8 pages	ERT	1.20
07/11/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding additional information need to draft outline of items for the Receiver's Report and items of new business (to be discussed during tonight's Board meeting)	ERT	0.20
07/11/23	Email correspondence with independent counsel (Adriana Pavon, Esq.) regarding additional information need to draft outline of items for the Receiver's Report and items of new business (to be discussed during tonight's Board meeting)	ERT	0.30
07/11/23	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	2.10

07/11/23	Begin to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (begin to draft the following section: Introduction, pp. 1-2)	ERT	1.20
07/12/23	Review and respond to Corey Tickner email re: contract .1; review and respond to Reese Seat email re: briefing schedule .1; review and respond to Melanie Damian email re: bill .1; review and respond to Danilo Baptista email re: ATT set-up .1; review and respond to Melissa Davis forensic report .1; conference with Melanie Damian and Eric Thompson re: update from board meeting .4; obtain financial information and furnish to the advisory board .2; review and respond to Corey Tickner email with PowerPoint re: contracts re: today's meeting .3; attend zoom meeting with Hammocks re: existing contracts 3.1	DMG2	4.50
07/12/23	Continue drafting Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (finish drafting the following section: Introduction, pp. 1-2; begin to draft the following section: Receiver's Activities and Efforts for the Period May 5, 2023 Through July 17, 2023 and Action Plan Moving Forward, pp. 2-14)	ERT	7.20
07/12/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss strategy going forward:1) following last night's Advisory Board meeting, including complaints about security company; and 2) with regard to pending lawsuits against the Association's former counsel	ERT	0.40
07/12/23	Email correspondence with independent counsel (Russell Landy, Esq.) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.10
07/12/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.10
07/12/23	Email correspondence with independent counsel (Kenneth Murena,	ERT	0.20

	Esq.) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)		
07/13/23	Review and respond to Don Kerns email re: HOA .1; review and respond to email from Corey Tickner re: HOA .1; review and respond to email from Eric Thompson re: bill .1; review and respond to email from Soneet Kapila re: billing statement .1; conference with Melanie Damian re: bank accounts and de-brief contract meeting .4; review Poe Roofing voicemail and send to Chicky Addison re: roofing issue .1; obtain information re: non-FSR bank accounts and send information to advisory board .2; review and edit draft of report for the court .4; review and respond to Chicky Ardisson email re: roofing issue .1; conference with Alyson Theale re: budget and other issues .4; review and respond to Eric Thompson re: revisions to report .1; review and respond to Eric Thompson and Russell Landy email re: protocol for ACC approval .1; review and respond to Carlos Villalobos re: email list in his possession .1; review Russell Landy email to those concerned re: detailing ACC protocol .1	DMG2	2.40
07/13/23	(Oviedo) numerous emails to and from FSN regarding lien; research same and could not identify lien; emails to and from FSN re same (document at issue was a notice of preservation - nothing further required)	LML3	0.80
07/13/23	Finish drafting Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (finish drafting the following section: Receiver's Activities and Efforts for the Period May 5, 2023 Through July 17, 2023 and Action Plan Moving Forward, pp. 2-14; draft the following sections: 1) Conclusion, pg. 14; and 2) Sixth Interim Application for Order Authorizing the Payment of Fees, pp. 14-16)	ERT	4.60
07/13/23	Revise, in accordance with comments by D. Gersten, Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.10
07/13/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute	ERT	0.40

Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties), including review documents provided by Ms. Vazquez			
07/13/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.20
07/14/23	Review and respond to Melanie Damian email re: email .1; conference with Eric Thompson re: case issues .4; review and approve payment through Avid .2; review and respond to Suzette Morales email re: HOA .1; review and respond to email from Eric Thompson re: edit of next draft of report .3; review and respond to Corey Ticketing re: review new pool proposal and choose proper vendor for pumps .2; review and respond to Chicky Ardisson email(s) re: roof tiles .1; review and pay bills from Avid system .1; review and respond to Alyson Theale email(s) re: procedure .1	DMG2	1.60
07/14/23	Prepare a chart of all liens which appear may be released with relevant information for confirmation by FSN that no further monies are owed	LML3	2.70
07/14/23	Telephone conference with outside counsel (Maia Aron, Esq.) to further discuss 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	0.10
07/14/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties)	ERT	0.10
07/14/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding additional information needed to draft Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties), including review documents provided by Ms. Vazquez	ERT	0.10
07/14/23	Supplement Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment	ERT	0.10



Orders (as required by the Court's 11/21/22 OrderAppointing Receiver by Stipulation of the Parties) (based upon additional information provided by independent counsel (Kenneth Murena, Esq.) and Melissa Vazquez (FirstService Residential))			
07/14/23	Revise, in accordance with comments by Plaintiff's counsel (Robert Kelly, Esq.), Settlement Agreement and Mutual Release (for the case styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05)	ERT	0.10
07/16/23	Review and respond to Melanie Damian email re: emails .1; compose email to Carlos Villalobos and the advisory board as well as the legal team re: emails on behalf of the Association versus his own email collection .5; review and resend to email(s) form Melanie Damian and Ken Murena with edits to report before tomorrow's submission and review report with edits .6; review and respond to Jesmany Jomarron email re: branding .1	DMG2	1.30
07/17/23	Review and respond to Leo Lagamasino email re: release of liens .1; review Jesmany Jomarron billing and make deductions .3; review (fully edited by team members) report before filing today .4 ; review and respond to Robert Kelley email re: settlement agreement .1; review and respond to Melanie Damian email re: Kaufman billing .2; review and respond to Eric Thompson email re: Toorak cases .1; review and respond to Eric Thompson and Chicky Ardisson email re: ACC approvals .1; review and respond to Carlos Villalobos email re: response to previous email to him .1; review and respond to Robert Kelly email re: amended settlement agreement .1; review and respond to Corey Ticktin email re: log .1; review and respond to Chicky Ardisson email re: finance committee .1; conference(s) with Russell and Melanie Damian re: equipment/contract .7; review and respond to Corey Ticktin email re: payments .1; review and respond to Corey Ticktin email re: drainage inspection .1	DMG2	2.60
07/17/23	Finalize and forward to FSN chart of all liens which appear may be released with relevant information for confirmation by FSN that no further monies are owed; continue preparation of status chart of outstanding cases and list of to do items for each	LML3	4.80
07/17/23	[Chapman] Prepare dismissal of case; advise FSN of same; prepare discharge of lis pendens	LML3	0.30
07/17/23	Email correspondence with independent counsel (Melanie Damian, Esq.) regarding additional information to finalize Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's	ERT	0.10

11/21/22 Order Appointing Receiver by Stipulation of the Parties)			
07/17/23	Analyze revisions by independent counsel (Melanie Damian, Esq.) to Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (in furtherance of finalizing same)	ERT	0.20
07/17/23	Analyze revisions by independent counsel (Russell Landy, Esq.) to Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (in furtherance of finalizing same)	ERT	0.10
07/17/23	Analyze revisions by independent counsel (Kenneth Murena, Esq.) to Receiver's: 1) Fourth Supplemental Report; and, 2) Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds Pursuant to the Appointment Orders (as required by the Court's 11/21/22 Order Appointing Receiver by Stipulation of the Parties) (in furtherance of finalizing same)	ERT	0.20
07/17/23	Telephone conference with outside counsel (Maia Aron, Esq.) to further discuss 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	0.10
07/17/23	Email correspondence with D. Gersten 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 (following my 7/14/23 telephone conference with outside counsel (Maia Aron, Esq.) regarding same)	ERT	0.20
07/18/23	Conference with Alson Theale re: items re: meetings/finances/website/tech issues .9; review and respond to Don Kearns/Melissa Vasquez email re: Popular Bank .1; review and respond to email from Chicky Ardisson re: fining committee .1; review and respond to Jean Peralta email re: ACC .1; revel and respond to Corey Tickner and Don Kearns email re: exception to paying HOA .1; review email from Janice Uriarte re: ACC and communicate issue to Eric Thompson .1; review and respond to Danilo Baptista email with reports for review .2; review and respond top Russell Landy email re: ACC .1; attend presentation by Axela collections .7	DMG2	2.40
07/18/23	Emails to and from Melissa Vazquez, FSR, regarding dismissal of Chapman matter and attaching same; finalize release of lien; draft	LML3	0.80

	discharge of lis pendens		
07/18/23	Emails to and from Melissa Vazquez, FSR, re her completion of chart showing which liens can be released; coordinate finalizing and filing release of liens	LML3	0.40
07/18/23	[Navas] Emails to and from Mr. Thompson re trial status	LML3	0.20
07/18/23	Receive completed list of outstanding amounts from FSN on release of lien charge; follow up to execute and record releases of liens where appropriate	LML3	0.60
07/18/23	Review status of Navas matter and pending trial dates; emails to and from team re same	LML3	0.30
07/18/23	Analyze Appellants' Initial Brief (in the appeal styled Josue Cepero, et al. v. Hammocks Community Association Inc., et al., Appeal No. 23-cv-21795), 12 pages, in furtherance of drafting Answer Brief	ERT	0.50
07/19/23	Review Alejandro Leon email and forward to Melanie with communication for analysis and response .2; review and respond to Adriana Pavon email re: Veritex Community Bank .1; attend hearing in Judge Isacoff's court re: Cepero case .7; review and respond to Melanie Damian email with response to Napoleon motion to dismiss and review same for approval .4; review and respond to Robert Kelley email re: settlement and respond to Eric Thompson email re: preparation of motion for court .3; review and respond to multiple email(s) re: accounts receivable presentation including responses to Carlos Villalobos and other board members .3; review and respond to Chicky Ardisson and Danilo Baptiste email re: weekly report .1; review and respond to Ken Murena email re: court hearing this morning .1; review and respond to Eric Thompson and Ken Murena emails re: Cepero hearing .1; review and respond to Russell Landy email re: Juaregui lawsuit .1; review edits to Napoleon response pre-filing .1; review and respond to Don Kearns email re: presentation .1; conference with Eric Thompson re: pending legal issues .4	DMG2	3.00
07/19/23	Analyze and revise draft Omnibus Response to Defendants' Motion to Dismiss Complaint (drafted by independent counsel, Melanie Damian, Esq.), to be filed in the matter styled David M. Gersten, as Receiver of Hammocks Community Association Incorporated v. Rasco Klock Perez & Nieto, P.L., et al, Case No. 2023-016776-CA-01, 15 pages	ERT	0.40
07/19/23	Draft Receiver's Unopposed Motion to Approve Settlement Agreement (with regard to the recent settlement of the matter styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05), 4 pages	ERT	1.10

07/19/23	Draft proposed Agreed Order on Receiver's Unopposed Motion to Approve Settlement Agreement (with regard to the recent settlement of the matter styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05), 2 pages	ERT	0.10
07/19/23	Telephone conference with D. Gersten to discuss strategy as to various legal issues	ERT	0.40
07/19/23	Email correspondence with D. Gersten and independent counsel (Russell Landy, Esq.) regarding strategy as to potential resolution of the case styled Gersten, v. Jauregui Law, P.A., et al. - 2023-018690-CA-01	ERT	0.20
07/19/23	Email correspondence with independent counsel (Adriana Pavon, Esq.) regarding pending requests by homeowners for releases of liens filed by the prior Board	ERT	0.10
07/20/23	Review billing invoices from Avid and approve payments .4; review and respond to Corey Tickner email re: AXELA .1; review and respond to Danilo Baptiste email re: governing documents committee .1; review and respond to Melanie Damian email re: D&O insurance policy .1; review and respond to Jesmany Jomarron email re: tree/insurance issue .1; conference with legal team re: outstanding issues 1.1	DMG2	1.90
07/20/23	(Unit 203, Building 8) - Receive email from party which foreclosed on tax deed; research further action	LML3	0.40
07/20/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.), and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss pertinent legal issues	ERT	1.10
07/20/23	Analyze Court's 7/20/23 Judgment entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola, 1 page	ERT	0.10
07/20/23	Analyze Court's 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola, 4 pages	ERT	0.20
07/20/23	Email correspondence with D. Gersten and independent counsel (Kenneth Murena, Esq.) regarding analysis of and strategy going forward in light of 7/20/23 Judgment and 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola	ERT	0.40
07/21/23	Review and respond to emails from Eric Thompson and Ken Murena	DMG2	1.30

re: Cepero conference .1; review and respond to Jesmany Jomarron re: prior board meeting .1; review and respond to Chicky Ardisson email re: full finance committee and approve for posting on website .1; conference with Jesmany Jomarron re: Sunflower and other Hammocks issues .5; review and respond to Melissa Vasquez email re: AR report .1; review and respond too Melanie Damian email re: Sunflower .1; review and respond to Ken Murena email with memo re: Cepero .2; review and respond to Russell Landy email re: equipment with charts of payments .1

07/21/23	Continue preparation of status chart (review dockets on line for each case and determine counsel, status of litigation, and future course of action	LML3	3.40
07/21/23	(Building 8 unit 203) - Draft email to party regarding tax deed	LML3	0.20
07/21/23	Begin to draft Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) (draft the following section: 1) Statement of the Case, pages 5-12; begin to draft the following sections: 1) Summary of the Argument, currently pp. 12-14; and 2) Argument, currently pp. 14-15)	ERT	5.40
07/21/23	Analyze the following case law cited in Appellants' Initial Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) in furtherance of drafting Answer Brief: 1) In re Dolan (S.D. Fla. 2016), 7 pages; and 2) In re: Lyabarsky (S.D. Fla. 2020), 14 pages	ERT	0.30
07/24/23	Review and respond to Corey Tickner email re: volunteers .1; review and respond to Chicky Ardisson email re: website accuracy .1; conference with Russell Landy re: equipment .3; review and respond to Juan Franco email re: security .1; review and respond to Corey Tickner email re: towing company and review documents .2; review and respond to Corey Tickner email re: call log .1; conference with Eric Thompson, Ken Murena and Jesmany Jomarron re: Cepero appeal issues 1.1; conference with Russell Landy re: budget and equipment issue .1; review and respond to Corey Tickner email re: call in logs/explanation .1; review and forward Steve Katz billing to Melanie Damian .1; conference with Eric Thompson re: motion for clarification .2; review and respond to Corey Tickner email re: finance meeting .1; review and respond zoo Merlanie dDamian email re: violation .1; review and respond to Melanie Damian email re: Steve Katz billing issues .1; review and respond to Melanie Damian email re: Sunflower .1; review and respond to Melanie Damian email re: delinquencies and need to send notice letter .1; review and respond to Jesmany Jomarron with proposed rules .3	DMG2	3.30

07/24/23	Telephone conference with independent counsel (Kenneth Murena, Esq.) to further discuss analysis of and strategy going forward in light of 7/20/23 Judgment and 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola	ERT	0.20
07/24/23	Telephone conference with D. Gersten, independent counsel (Kenneth Murena, Esq.), and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding analysis of and strategy going forward in light of 7/20/23 Judgment and 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola	ERT	1.10
07/24/23	Analyze the following materials for pertinent citations to include in Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola): 1) 11/7/22 Initial Brief, 53 pages; 2) 5/24/23 Reply Brief, 27 pages; 3) 6/23/23 Opinion and Order, 10 pages; 4) 6/26/23 Motion for Rehearing, 16 pages; 5) 7/20/23 Order Denying Motion for Rehearing, 4 pages; and 6) 7/20/23 Judgment, 1 page	ERT	1.20
07/24/23	Analyze Florida federal case law addressing propriety of motions for clarification, generally (in furtherance of drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola)	ERT	0.60
07/24/23	Analyze Florida federal case law addressing standard applied to motions to amend or alter a judgment under Fed. R. Civ. P. 59 and Bankruptcy Rule 9023 (in furtherance of drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola)	ERT	0.40
07/24/23	Begin to draft Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola) (begin to draft the following section: 1) Section I-Background, pp. 1-5)	ERT	1.40
07/24/23	Email correspondence with Robert Kelly, Esq.( Plaintiff's counsel in the matter styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05), attaching and regarding draft Receiver's Unopposed Motion to Approve Settlement Agreement and proposed Agreed Order on same (with regard to the recent settlement of that lwsuit), for Mr. Kelly's review	ERT	0.10

	and approval (including his comments to same)		
07/24/23	Telephone conference with D. Gersten to further discuss analysis of and strategy going forward in light of 7/20/23 Judgment and 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola	ERT	0.20
07/25/23	Review and respond to Alyson Theale email re: open items .1; review and respond to Corey Tickner re: town hall .1; review and respond to Melissa Vasquez email re: meeting details .1; review and respond to Eric Thompson email re: settlement order signed by Judge Butchko .1; review and respond to Eric Thompson re: payment information .1; review and respond to emails between Eric Thompson and Melissa Vasquez re: payment issue .1; conference with Eric Thompson re: clarification motion .2; review and respond to Jesmany Jomarron email re: rules .1; review and respond to Juan Franco email(s) re: security .1; email to Melanie Damian re: security .1; review and respond to Jesmany Jomarron re: rules .1; review Melissa Vasquez email with notice(s) attached .2; review and respond to Corey Tickner email re: Elite .1; review Corey Tickner's email with attachments re: financials and examine same .3; attend zoom financial meeting with advisory board, FSR team and Jesmany Jomarron 1.3	DMG2	3.10
07/25/23	[Villanueva] - Emails to and from FSN regarding release of lien; research same and information is not verified in receiver's records; follow up emails to FSN re same	LML3	0.60
07/25/23	[Cajimat] - Review status of matter re scheduling order (no service on defendant) and report to team	LML3	0.30
07/25/23	Continue drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola) (finish drafting the following section: 1) Section I-Background, pp. 1-5; begin to draft the following section: 1) Section II-Motion to Alter or Amend Judgment, pp. 7-12)	ERT	3.80
07/25/23	Telephone conference with D. Gersten to further discuss analysis of and strategy going forward in light of 7/20/23 Judgment and 7/20/23 Order Denying Motion for Rehearing entered in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola	ERT	0.20
07/25/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding settlement payment to be issued for resolution of the matter styled The Sarmina Cetraro Law Group, P.A. v. Hammocks	ERT	0.10

Community Association Inc., Case No. 2021-021625-CC-05

07/25/23	Analyze Florida federal case law addressing motions for clarification directed to appellate opinion and orders or to orders/judgment containing internal inconsistencies (in furtherance of drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola)	ERT	0.40
07/26/23	Review Avid billing requests for payment of bills .2; review and respond to Jesmany Jomarron email re: proposed rules .3; review and respond to legal team email(s) re: discussion items .2; conference with Melanie Damian, Eric Thompson and Jesmany Jomarron re: pending issues to be resolved re: town hall, collections and notices 1.1; review and respond to Ken Murena lengthy email and memo re: Cepero .2; review and respond to Eric Thompson email re: motion .1; review and respond to Reese Setae email with attached motion to vacate .2; review and respond to Eric Thompson email re: response .1; review Chicky Ardisson and Cory Tickner email re: ACC and have team answer .2 ; review and edit Jesmany Jomarron draft of Town Hall announcement .2; review Russell Landy draft of amended complaint .2; review and respond to Melissa Vasquez email re: Popular Bank account .1	DMG2	3.10
07/26/23	Analyze proposed Rules of the Board of Directors of the Hammocks Community Association Incorporated (drafted by Advisory Board counsel, Jesmany Jomarron, Esq.), 4 pages (as requested by D. Gersten)	ERT	0.20
07/26/23	Telephone conference with D. Gersten, independent counsel (Melanie Damian, Esq.), and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss pertinent legal issues, including request for a sub-association for Sunflower, Rules of the Board of Directors of the Hammocks Community Association Incorporated (drafted by Advisory Board counsel, Jesmany Jomarron, Esq.), upcoming town hall meeting, and delinquency notices to homeowners	ERT	1.10
07/26/23	Analyze Florida federal case law addressing showing that must be made to establish "manifest injustice" (in furtherance of drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola)	ERT	0.20
07/26/23	Analyze the following additional materials for pertinent citations to include in Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola): 1) 7/19/21 Order Finding Hammocks Community Association Inc. and Marglli Gallego in Contempt, 12 pages; 2)	ERT	0.40



	10/28/21 Order on Sanctions and Setting Further Evidentiary Hearing, 12 pages; 3) 8/10/22 Order Granting in Part Motion to Alter or Amend Judgment for Rehearing, Relief from Judgment and/or Reconsideration as to ECF 480, 6 pages; and 4) 6/8/22 Order on Damages, 13 pages		
07/26/23	Continue drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola) (continue drafting the following section: 1) Section II-Motion to Alter or Amend Judgment, pp. 7-12)	ERT	3.40
07/27/23	Review and respond to Eric Thompson email re: ACC applications .1; review and forward ATT email re: installation .1; review edits to draft amended complaint .2; review and respond to Ken Murena email re: letter to judge .1; review and edit draft motion to amend/alter/clarification .5; review and respond to Ken Murena email re: Judge Issacoff letter/filing .1; email to/from Eric Thompson re: draft motion .1; conference with Melissa Vasquez re: bank account ; review Eric Thompson/Danilo Baptiste email re: ACC forms .1; review emails between Chicky Ardisson and Danilo Batiste re: ACC .1; review and respond to Melissa Vasquez email re: consolidation of bank account .1; review and forward Carlos Villalobos email to legal team .1; review nd respond to Ken Murena email re: bank account .1	DMG2	1.70
07/27/23	(Villanueva) - Follow up emails with FSN; receive additional documents for different unit owner (Espinal); phone call to unit owners counsel re same	LML3	0.30
07/27/23	Telephone conference with Danilo Baptista (FirstService Residential) regarding pending Architectural Control Applications for approval/denial by the Receiver	ERT	0.10
07/27/23	Analyze and revise draft Amended Complaint in the matter styled David M. Gersten, as Receiver of Hammocks Community Association Incorporated vs. Alfaro & Fernandez, P.A., et al., Case No. 2023-016776-CA-01 (drafted by independent counsel, Russell Landy, Esq.),14 pages (as requested by D. Gersten)	ERT	0.60
07/27/23	Revise, in accordance with comments by D. Gersten, Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola)	ERT	0.20
07/27/23	Finish drafting Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola) (finish drafting the following section: 1) Section	ERT	1.80

	II-Motion to Alter or Amend Judgment, pp. 7-12; draft the following section: 1) Section III-Motion for Clarification, pp. 13-14)		
07/27/23	Prepare Architectural Control Application Determination Forms for 22 pending Architectural Control Applications for approval/denial by the Receiver, including any underlying Applications for pertinent information to be included on Determination Form	ERT	1.40
07/27/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding pending Architectural Control Applications for approval/denial by the Receiver	ERT	0.40
07/28/23	Review and respond to Eric Thompson email re: settlement .1; conference with Eric Thompson re: pending case .2; review and approve Avid billing .1; conference with Jesmany Jomarron re: committee issues .9; conference with Melanie Damian re: committee issue .1; review and respond to Carlos Villalobos email re: committee .2; review and respond to Russel Landy email re: mediators .2; review and respond to Eric Thompson email re: case .1; review and respond to Jesmany Jomarron email re: proposed rules .2; review edited response .3; review and respond to Jesmany Jomarron email re: rules .1	DMG2	2.50
07/28/23	[Espinal] - Receive correct lien documents from FSN, confirm no amounts owed, and coordinate filing release	LML3	0.40
07/28/23	Analyze revisions to Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola) by independent counsel (Kenneth Murena, Esq.) in furtherance of finalizing same for filing	ERT	0.30
07/28/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding status of settlement payment for the matter styled The Sarmina Cetraro Law Group, P.A. v. Hammocks Community Association Inc., Case No. 2021-021625-CC-05	ERT	0.20
07/29/23	Review latest edits to response .3; review and respond to Jesmany Jomarron email(s) re: tree issue .2	DMG2	0.50
07/30/23	Review and respond to Jesmany Jomarron email re: town hall .1; review and respond to Eric Thompson email re: citations in filing .1	DMG2	0.20
07/31/23	Review and respond to Carlos Villalobos email re: committee meeting .1; review and respond to Jesmany Jomarron and Eric Thompson email(s) re: settlement of Gerald Kohn claim .3; review and respond to Reese Setae email re: new order from Judge Scola in Cepero case and email Eric Thompson re: same .2; review and respond to Eric	DMG2	2.40

Thompson and Jesmany Jomarron email(s) re: rules adjustment re: attorney .2; review and respond to Eric Thompson email re: letter to Judge Isakoff .1; review and respond to Pete Cabrera (and others) email re: need for minutes approval .1; review and respond to Carlos Villalobos email re: Ms. Avendano .1; review and respond to Ken Murena and Eric Thompson email(s) re: Cepero filing .2; review and respond to email communication to Michael Brooks re: motion .1; conference with Jesmany Jomarron re: legal issues .8; review and respond to Adam Ruff email re: new lawsuit where Hammocks is being sued .2

07/31/23	[Zayas] - Review Plaintiff's opposition to Motion to Dismiss	LML3	0.10
07/31/23	Email correspondence with Appellees' counsel (Michael Brooks, Esq.) regarding our impending Motion to Alter or Amend Judgment or, in the Alternative, for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal No. 22-22686-Civ-Scola), in an effort to meet and confer regarding that Motion prior to filing (as required by the Local Rules)	ERT	0.20
07/31/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding strategy as to potential resolution of property damage claim by homeowner Gerald Kohn	ERT	0.20
07/31/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding comments to revised Rules of the Board of Directors of the Hammocks Community Association Incorporated (drafted by Mr. Jomarron), including review most recently revised (on 7/29/23) version of those Rules	ERT	0.30

### Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	644.00	50.30	32,393.20
ERT	Eric Thompson	Partner	368.00	67.30	24,766.40
LML3	Leonor Lagomasino	Of Counsel	322.00	18.50	5,957.00

TOTAL FOR SERVICES	\$68,605.00
LESS DISCOUNT	-5,488.40
TOTAL FEES	\$63,116.60

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## Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/18/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-199-39037 DATE: 7/21/2023 FedEx service for 819939037,781322320500,Delivery service fees of 71.04 to David Gersten, 14804 SE NORTHSHORE CIR/VANCOUVER WA 98683 re: 13769/matter id 1292668	71.04
	TOTAL EXPENSES	<hr/> \$71.04

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## Outstanding Statements as of August 18, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21354173	June 29, 2023	\$48,652.51
Statement No 21360474	July 13, 2023	\$20,065.14
<b>Total Accounts Receivable Balance:</b>		<hr/> <b>\$68,717.65</b> <hr/>

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

August 18, 2023  
ID: GERSP 1292668  
Invoice No. 21387877  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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**BILLING SUMMARY THROUGH July 31, 2023**

Fees For Professional Services:	\$68,605.00
LESS DISCOUNT	-5,488.40
Total for Professional Services:	63,116.60
Expenses and Advances:	<u>71.04</u>
<b>Current Bill:</b>	<b>\$63,187.64</b>

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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: 21387877

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**GORDON&REES**  
**SCULLY MANSUKHANI**  
**YOUR 50 STATE PARTNER®**  
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

September 28, 2023  
ID: GERSP 1292668  
Invoice No. 21415052  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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**BILLING SUMMARY THROUGH August 31, 2023**

Fees For Professional Services:	\$76,015.00
LESS DISCOUNT	-\$3,800.75
Total for Professional Services:	\$72,214.25
Expenses and Advances:	<u>\$30.77</u>
<b>Current Bill:</b>	<b>\$72,245.02</b>

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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>
08/01/23	Review and respond to Eric Thompson email re: Turf billing .1; review and respond to Eric Thompson email re: Kohn settlement agreement .1; review and respond to Eric Thompson email re: Axiom .1; review and respond to Jesmany Jomarron email re: fees expert .1; review and respond to Jesmany Jomarron email re: proposed rules .1; review and respond to Resa Setae email re: Cepero hearing .1; review and respond to Danilo Batiste and Pete Cabrera email re: minutes .1; review and respond to Eric Thompson email re: conference .1; review and respond to Eric Thompson email with draft release re: Kohn tree issue .3; review and respond to Pete Cabrera email re: MDPD billing .1; conference with Eric Thompson re: Judge Scola order and effect on other issues .2	DMG2	1.40
08/01/23	Review court files and internal documents for 56 lawsuits where the Association is a plaintiff or defendant and draft status report as to each case and with initial list of to do items.	LML3	10.20
08/01/23	Email correspondence with D. Gersten, Melissa Vazquez (FirstService Residential), and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding steps going forward as to the Association's collections company, Axiom (hired pre-receivership)	ERT	0.20
08/01/23	Telephone conference with D. Gersten regarding strategy going forward in light of Court's 8/1/23 Paperless Order directing Clerk to close the case (in the appeal styled, Gersten v. Cepero, Appeal Case No.1:23-cv-21612-RNS)	ERT	0.20
08/01/23	Draft General Release and Hold Harmless Agreement for resolution of claims against the Association by homeowner Gerald Kohn (9230 SW 150 Ave.) pertaining to Mr. Kohn's claim that a tree on Association property caused damages to his property, 3 pages	ERT	0.70
08/01/23	Analyze Florida federal case law addressing whether Section 362(k) of the Bankruptcy Code permits an award of attorneys' fees for contemptuous conduct, generally, or only for violations of a bankruptcy stay (in furtherance of drafting Answer Brief in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS)	ERT	0.60
08/01/23	Continue drafting Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) (finish drafting the following section: 1) Summary of the	ERT	2.90

Argument, pp. 13-15; continue drafting the following section: 1)  
Argument, currently pp. 15-21)

08/02/23	Review and respond to Leo Lagamasino email with chart attached re: pending cases .2; review and respond to Russell Landy email with proposed storage contract attached .2; review and respond to Russell Landy email re: Leaf re: loan .1; review and respond to Don Kearns and Marco Antonio email(s) re: monthly payment .1; conference with Leo Magazine and Eric Thompson re: pending cases/status .3; review and respond to Jesmany Jomarron email re: rules .1; review and respond to Melissa Vasquez email re: Axiom re: list of open and closed matters .2; review and respond to Jesmany Jomarron email re: closing out Kohn matter .1; review and respond to Russell Landy email re: complex business division .1; review and respond to Naomi Sanabria email re: Judge Isakoff hearing .1; review and respond to Jesmany Jomarron email re: MDPD payment .1; review and respond to Ken Murena email re: hearing .1; review and respond to Russell Landy email re: renewal of storage contract .1; review and respond to Michael Books' email re: objection to motion .1; review and respond to Chicky Ardisson email re: final review of minutes and email to advisory board re: minutes .1; review and respond to Melissa Vasquez email re: conference re: axion .1; review and respond to Ken Murena email re: conference re: Cepero .1; review and respond to Melanie Damian email re: case issues .1; review and respond to Leo Lagamasino email re: Colon lawsuit .1; review and respond to Kenny Murena email re: bankruptcy cases re: pend	DMG2	2.70
08/02/23	Finalize review of court files and internal documents for 56 lawsuits where the Association is a plaintiff or defendant and prepare 13-page status report as to each case and initial list of to do items; attend conference call with Judge Gersten and Mr. Thompson re status of cases.	LML3	4.40
08/02/23	[Colon] - review court file in detail and prepare memo to receiver with background recommending to dismiss action ; receive responses from Receiver and Mr. Thompson	LML3	0.80
08/02/23	Continue drafting Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) (continue drafting the following section: 1) Argument, currently pp. 15-21)	ERT	1.90
08/02/23	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



08/02/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding strategy as to purported outstanding balance due to the Miami-Dade Police Department for pre-receivership off duty patrol of the Association, including review attached invoices from the Miami-Dade Police Department	ERT	0.20
08/02/23	Draft Order Granting Receiver's Sixth Interim Application for Order Authorizing Payment of Fees and Expenses and for Authorization to Distribute Funds, 3 pages	ERT	0.30
08/02/23	Telephone conference with D. Gersten and L. Lagosino to discuss strategy going forward as to pending foreclosure cases being handled by L. Lagosino	ERT	0.30
08/02/23	Analyze Debtors' 8/9/21 Statement of Damages on Order of Contempt filed in the underlying bankruptcy case, 9 pages, in furtherance of drafting Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS)	ERT	0.20
08/02/23	Analyze the following case law cited in Debtors' 8/9/21 Statement of Damages on Order of Contempt filed in the underlying bankruptcy case in furtherance of drafting Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS): 1) In re: Horne (11th Cir. 2017), 10 pages; 2) In re: Parker (11th Cir. 2015), 4 pages; and 3) In re: Rhodes (M.D. Fla. 2017), 12 pages	ERT	0.30
08/03/23	Conference with Eric Thompson and Ken Murena re: Cepero filing(s) .3; review and forward email from Cristina Alayeto re: contact person .1; review Ressa Setae email with Morrison to transfer .1; review and respond to Melissa Vasquez/Eric Thompson emails re: Cristina Alayeto email .1; conference with Melanie Damian and Eric Thompson re: pending issues and town hall .3; initial review and initial editing of answer brief 2.4	DMG2	3.30
08/03/23	[Colon] - send follow up email to Ms. Stone; research whether fees would be assessed if case voluntarily dismissed	LML3	1.20
08/03/23	Email correspondence with D. Gersten and L. Lagosino regarding strategy as to pending defamation claim filed by Marglli Gallego and the Association (pre-receivership) against homeowner Bernarda Colon	ERT	0.20
08/03/23	Telephone conference with D. Gersten and independent counsel (Kenneth Murena, Esq.) regarding strategy going forward in light of Court's 8/1/23 Paperless Order directing Clerk to close the case (in the appeal styled, Gersten v. Cepero, Appeal Case No.1:23-cv-21612-RNS)	ERT	0.30

08/03/23	Telephone conference with independent counsel (Russell Landy, Esq.) to discuss preparation for 8/9/23 hearing in the receivership case on the Ceperos' motion for relief from the receivership stay	ERT	0.10
08/03/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss legal issues	ERT	0.30
08/03/23	Finish drafting Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) (continue drafting the following section: 1) Argument, currently pp. 15-21; review and revise entire brief to finalize)	ERT	5.40
08/04/23	Email to Jesmany Jomarron re: technology issues .1; review order closing appeal .1; review and respond to Jesmany Jomarron and Melanie Damian emails re: town hall technology issues .1; review and respond to Chicky Ardisson and Jesmany Jomarron emails re: technology issues .1; continued review and editing of current draft of answer brief 1.7; review David billing for payment .2; review and respond to multiple Jesmany Jomarron emails re: ACC meeting .3; review and respond to Jesmany Jomarron email re: drafting ACC protocol re: FSR actions .2	DMG2	2.80
08/04/23	Analyze memorandum prepared independent counsel (Russell Landy, Esq.) regarding requirement that subsequently filed state court action be stayed in favor of previously filed federal court action, including draft brief synopsis of same for incorporation into Notice of Authorities to be drafted by A. Ruff (in preparation for 8/9/23 hearing in the receivership case on the Ceperos' motion for relief from the receivership stay)	ERT	0.40
08/04/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding steps going forward as to the Association's collections company, Axiom (hired pre-receivership)	ERT	0.10
08/04/23	Analyze 8/4/23 correspondence from Adam Sleaf of Axiom Resources (the Association's collections company, hired pre-receivership), 1 page, and enclosed Case Status Report, 18 pages	ERT	0.20
08/04/23	Analyze ACR HOA Service and Assignment Agreement (forwarded on 8/4/23 by Axiom Resources - the Association's collections company, hired pre-receivership), 8 pages	ERT	0.40
08/04/23	Analyze all email correspondence from 7/17/23-present with FirstService Residential and independent counsel (Melanie Damian, Esq., Russell Landy, Esq., and Kenneth Murena, Esq.) to identify all pertinent matters to include in outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall)	ERT	0.90

08/06/23	Review and respond to Melanie Damian email re: town hall .1; review and approve billing statement through Avid .2	DMG2	0.30
08/07/23	Review and respond to Corey Ticketing email re: tree removal .1; review contracts and email to Corey Ticketing re: towing contracts .1; review and respond to Pete Cabrera email with latest draft of minutes for my approval .2; review and respond to Eric Thompson email re: edited to current draft of brief .1; review and respond to Melissa Vasquez email re: billing question .1; review and respond to Corey Ticketing email re: call log .1; continued review and editing of current draft of brief 2.1; review and pond to Ken Murena email re: insurance issue .2; review avid billing and approve .1; review and resound to Ken Murena email re: Judge Isakoff .1; review and respond to Jesmany Jomarron email re: town hall .1; zoom meeting with Melanie Damian, Eric Thompson and Jesmany Jomarron re: town hall set-up 1.2; conference with Eric Thompson and Jesmany Jomarron re: town hall set-up .2	DMG2	4.70
08/07/23	Draft outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall), 5 pages	ERT	2.70
08/07/23	Analyze proposals from Whitts Tow Away, Inc. and Regulated Towing, 8 pages	ERT	0.20
08/07/23	Email correspondence with D. Gersten regarding recommendation as to proposals from Whitts Tow Away, Inc. and Regulated Towing	ERT	0.10
08/07/23	Analyze on-line dockets for all pending cases filed by the Receiver (against the Association's former attorneys and Board members) to determine status of each such case (in furtherance of drafting outline of items for the Receiver's Report and itemsof new business, to be discussed during 8/8/23 town hall)	ERT	0.20
08/07/23	Analyze and revise draft Notice of Filing Authorities drafted by A. Ruff (to be filed for use during the 8/9/23 hearing in the receivership case on the Ceperos' motion for relief from the receivership stay)	ERT	0.20
08/07/23	Revise, in accordance with comments by D. Gersten, Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS)	ERT	1.40
08/07/23	Attend (remotely, via Zoom) meeting with D. Gersten, Advisory Board counsel (Jesmany Jomarron, Esq.), and independent counsel (Melanie Damian, Esq.) to discuss preparation for 8/8/23 town hall meeting	ERT	1.30

08/07/23	Attend (remotely, via Zoom) meeting with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) to further discuss preparation for 8/8/23 town hall meeting	ERT	0.20
08/08/23	Review and respond to Melanie Damain email re: finances .1; review and respond to Resa Setae email with motion attached for review re: Cepero .2; review and respond to Melissa Vasquez email with financials for review .3; review and respond to Corey Ticktin email re: pools repairs and inspections .1; review and respond to Danilo Batiste email re: security .1; conference. with Eric Thompson re: receiver's report for town hall .5; review updated receiver's report for use at town hall .5; attend and conduct zoom town hall 1.0; conference with Greenberg CPA re: budget committee work .2	DMG2	3.00
08/08/23	[Zayas] - Draft and file Answer and Affirmative Defenses	LML3	0.80
08/08/23	Analyze "Status Chart as of August 2, 2023" regarding status of pending foreclosure cases involving the Association (drafted by L. Lagosino), 13 pages, in furtherance of supplementing outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall) following comments during yesterday's meeting with D. Gersten, Advisory Board counsel (Jesmany Jomarron, Esq.), and independentcounsel (Melanie Damian, Esq.) to discuss preparation for town hall	ERT	0.20
08/08/23	Revise/supplement outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall): 1) following comments during yesterday's meeting with D. Gersten, Advisory Board counsel (Jesmany Jomarron, Esq.), and independentcounsel (Melanie Damian, Esq.) to discuss preparation for town hall; and 2) updated financial information provided by Ms. Damian and FirstService Residential	ERT	1.40
08/08/23	Telephone conference with D. Gersten to discuss his comments to revised/supplemented outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall)	ERT	0.50
08/08/23	Analyze updated financial information provided by independent counsel (Melanie Damian, Esq.) and FirstService Residential in furtherance of supplementing outline of items for the Receiver's Report and items of new business to be discussed during 8/8/23 town hall	ERT	0.40
08/08/23	Analyze the following materials in preparation for attendance at tomorrow's hearing in the receivership case on the Ceperos' motion for relief from the receivership stay: 1) Receiver's 8/8/23 Notice of Filing Authorities; 2) docket of underlying state court case; 3) Complaint filed in underlying state court case; 4) the Association's Motion to Dismiss	ERT	0.80

	filed in underlying state court case; and 5) the Ceperos' Motion for Relief from Receiver's Order Dated November 21, 2022		
08/08/23	Further revise/supplement, in accordance with comments by D. Gersten, outline of items for the Receiver's Report and items of new business (to be discussed during 8/8/23 town hall)	ERT	0.90
08/08/23	Attend (remotely, via Zoom) Town Hall IV meeting with homeowners	ERT	1.00
08/09/23	Attend court hearing in Rasco/Napolean case 1.6; review and respond to Melanie Damian email re: town hall .1; review and respond to CPA email re: dates of unavailability .1; review and respond to Ken Murena email re: insurance issue .2; send email to Jesmany Jomarron re: insurance .1; conference with Eric Thompson re: response to Cepero motion .3; conference with Russell Landy re: witnesses and related matters .4; review and respond to Melanie Damian re: Marcoantonio request .1; review and respond to Chicky Ardisson email re: homeowner account .1; review and respond to Ken Murena email re: Cepero response .1; review and respond to Ken Murena email re: insurance issue .1; review and respond to ATT email re: tech issue .1; review and finalize editing of brief 2.0; review and respond to Jesmany Jomarron email re: tech issue .1; review and respond to Jesmany Jomarron email re: insurance issue .1	DMG2	5.50
08/09/23	Revise, in accordance with comments by independent counsel (Kenneth Murena, Esq.), Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS) and finalize (including proof) for final review/approval by D. Gersten	ERT	0.90
08/09/23	Telephone conference with D. Gersten to discuss strategy for response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.30
08/09/23	Analyze Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686), 9 pages, in furtherance of drafting Response thereto	ERT	0.30
08/09/23	Analyze Weisgram v. Marley Co. (2000), 11 pages, cited in Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686), in furtherance of drafting Response to that Motion	ERT	0.20
08/09/23	Analyze pertinent portions of the Federal Rules of Civil Procedure, the Federal Rules of Appellate Procedure, and the Federal Rule of	ERT	0.80

	Bankruptcy Procedure in furtherance of drafting Response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)		
08/09/23	Analyze all Federal case law addressing an appellate court's ability to issue judgments in furtherance of drafting Response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	1.10
08/09/23	Further revise, in accordance with additional comments by D. Gersten, Answer Brief (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS)	ERT	0.20
08/09/23	Draft Response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686), 7 pages	ERT	4.10
08/10/23	Review and approve Avid billing submissions .2; review and respond to Eric Thompson email with Axion letter and schedule attached .2; review Eric Thompson email re: obtaining payment from Axiom .1; review and edit response to Cepero motion .5 ; review and respond to Ken Murena/Eric Thompson email re: response .1; review and respond to Eric Thompson email re: Cepero brief .1; conference with Eric Thompson re: Axiom .3; review and respond to Ken Murena email re: filing of response .1; email to Alyson Theale, Melissa Vasquez, Melanie Damian , Eric Thompson and Jesmany Jomarron re: zoom meeting re: collections .1	DMG2	1.70
08/10/23	Detailed email correspondence with D. Gersten summarizing my analysis of ACR HOA Service and Assignment Agreement (forwarded on 8/4/23 by Axiom Resources - the Association's collections company, hired pre-receivership) and related issues	ERT	0.60
08/10/23	Email correspondence with Adam Slep (Axiom Resources, the Association's collections company, hired pre-receivership) regarding additional information needed from Axiom to assess their contractual relationship with the Association and steps going forward regarding same	ERT	0.40
08/10/23	Revise, in accordance with comments by D. Gersten, Response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.20

08/10/23	Telephone conference with D. Gersten to discuss my analysis of ACR HOA Service and Assignment Agreement (forwarded on 8/4/23 by Axiom Resources - the Association's collections company, hired pre-receivership) and related issues	ERT	0.30
08/11/23	Review and respond to Corey Tickner email re: ACC issue .1; review and respond to Danilo Batiste email re: ACC issue .1; review and respond to Danilo Batista email re: two homeowner ACC issues .1; review and edit draft 15 page letter to insurance company .3; review and respond to Pete Cabrera email re: trees/trimming .1; review and respond to Turf multi- page proposal re: tree/stump removal .3; review and respond to Leo Lagamasino email re: Danton matter payments .2; review and respond to Leo Lagamasino re: Danton payments .1; review and respond to Russell Landy re: mediation re: Rasco case .1; review and respond to Leo Lagamasino re: trade secret case .1; review Leo Lagamasino email re: Gleason case .1; review Leo Lagamasino emails re: several cases re: resolution .2	DMG2	1.80
08/11/23	[Kendall Beach Club] - review both foreclosure pleadings in detail and prepare memo to Receiver advising of order to pay past due amounts to prior counsel and requesting instructions for follow up; receive response from Receiver	LML3	0.80
08/12/23	[Sui] - review pleadings and emails in detail; finalize Motion for Stay and follow up email re setting for hearing (.8); [Cajimat] - review pleadings and emails in detail; finalize Motion for Stay and follow up email re setting for hearing (.7); Canfux - review pleadings and emails in detail; finalize Motion for Stay and follow up email re setting for hearing (.4); [Kendall Beach Club] - review response from Receiver and reply, including consideration of Ardisson matter which should also be dismissed by Plaintiff (same counsel); email to Mr. Jomarron re resolution of foreclosure and payments submitted to prior counsel ; email to Mr. Jomarron re potential resolution of second foreclosure matter (.8); [Navas] - review court file in detail; email to Maia re documents for defense of foreclosure action (.5); [Arancibia] - review court file in detail and draft email to owner's counsel, Mr. Botsford, re potential resolution (.6); [Colon] - follow up email to Receiver re fees and Ms. Stone's response (.3); [Cajimat] - review court file in detail and draft instructions to team re renewed service (.4); [Canfux] - review court file in detail and draft instructions to team re service of complaint (.3); [Freo] - review court file in detail and draft instructions to team re service of complaint (.3); [Gleason] - review court file in detail and revise Motion for Stay; draft email to opposing counsel re potential resolution (.8); [Nogueira] - review court file in detail and instruct team to	LML3	12.50
08/13/23	[Nunez] - exchange emails with Mr. Jomarron	LML3	0.10

08/14/23	Review and respond to Corey Tickner email with repair and replace proposal(s) for gym equipment .1; email to Jesmany Jomarron re: zoom conference .1; review and respond to Eric Thompson email re: cases re: attorney fee issues .1; review and respond to Eric Thompson email re: Danton case re: mootness .1; review and respond to Leo Lagamasino email re: service of subpoena and extension(s) .1; review and respond to Eric Thompson.Leo Lagamasino emails re: Alfaro payments .1; review Jesmany Jomarron email re: meeting with FSR .1; review and respond to Eliana Arratia email re: fining committee .1; review emails between Leo Lagamasino and C. Granado re: case issues .1; review Eric Thompson/Jesmany Jomarron emails re: open cases .1; review and respond to emails between Eric Thompson and Leo Lagamasino re: dismissal of case .1; conference with Eric Thompson re: Axiom and Cepero .3; review and respond to Chicky Ardisson email re: application re: ACC and required items .1; review and respond to Kristen Gurruchari email re: finance committee meeting .1; review and respond to Chicky Ardisson re: decals .1	DMG2	1.70
08/14/23	[Gleason] - review response with attachments of past payments from opposing counsel; respond to same and forward payments with request for updated ledgers to FSR (.3)	LML3	0.30
08/14/23	[10441 SW 156th Street] - revise and finalize release of lien; emails to and from FSR re same	LML3	0.40
08/14/23	[Beach Club Kendall I and II] - exchange of emails with opposing counsel re amounts due; new instructions to team re service and default	LML3	0.20
08/14/23	[Colon] - exchange of emails with Receiver and Mr. Thompson re potential for assessment of fees; review applicable trade secret statute and defendant's pro se response to suit	LML3	0.60
08/14/23	Revise, in accordance with comments by independent counsel (Kenneth Murena, Esq.), and finalize for filing, Response to Appellees' 8/7/23 Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.20
08/14/23	Telephone conference with Adam Slep of Axiom Resources (the Association's collections company, hired pre-receivership) to discuss Axiom's handling of matters on behalf of the Association, including active cases	ERT	0.40
08/14/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding steps going forward as to the Association's collections company, Axiom (hired pre-receivership)	ERT	0.30



08/14/23	Email correspondence with Adam Sleaf of Axiom Resources (the Association's collections company, hired pre-receivership) regarding Axiom's handing of matters on behalf of the Association, including active cases	ERT	0.10
08/14/23	Telephone conference with D. Gersten to discuss my telephone conference today with Adam Sleaf of Axiom Resources - the Association's collections company, hired pre-receivership), including strategy going forward in light of same	ERT	0.20
08/14/23	Email correspondence with L. Lagomasino regarding strategy for continued prosecution of pending lawsuits filed by the Association, including strategy with regard to the potential and dismissal of certain of those claims	ERT	0.60
08/14/23	Analyze Chapter 688 of the Florida Statutes in furtherance of advising L. Lagomasino as to recommended strategy going forward as to the pending lawsuit styled Hammocks Community Association v. Bernarda Colon, Case No. 2018-028266-CA-01	ERT	0.20
08/14/23	Analyze on-line docket of the lawsuit styled Hammocks Community Association v. Bernarda Colon, Case No. 2018-028266-CA-01, as well as the following filings, in furtherance of advising L. Lagomasino as to recommended strategy going forward: 1) Complaint, 10 pages; 2) Answer, 2 pages; and 3) Motion for Summary Judgment, 4 pages	ERT	0.30
08/15/23	Review and respond to Ken Murena email re: details re: case .1; review Avid billing for approval .1; review and respond to Eric Thompson email re: violations .1; review Melissa Vasquez email with A/R chart attached .2; attend zoom meeting with Alyson Theale, Melissa Vasquez, Jesmany Jomarron, and Melanie Damian re: collections 1.3; conference with Eric Thompson re: homeowner issues .2; review and respond to Adriana Pavon email re: payment plan re: Trustee in bankruptcy .1; review and respond to Eric Thompson email re: Goins .1; review and respond to Melissa Vasquez email with enclosed proposed budget for initial review and analysis 1.3; review and respond to Adam Ruff email re: new case .1; review and respond to Alyson Theale and Jesmany Jomarron email(s) re: collections .1; review and respond to Jesmany and Melissa Vasquez email(s) re: rental checklist .1	DMG2	3.80
08/15/23	[Beach Club Kendall] - email to FSR regarding pending foreclosures and request for information regarding ownership and past due amounts [.2]; [Gleason] - email to FSR regarding pending foreclosures and request for past due amounts (.1)	LML3	0.30
08/15/23	Review new trial court order with potentially incorrect dates and exchange emails with Plaintiff's counsel regarding same	LML3	0.20

08/15/23	Analyze Appellees' 8/15/23 Reply to the Association's Response to Appellees' Renewed Motion to Vacate Judgment Entered July 20, 2023 as Void and Incorporated Memorandum of Law (in Appeal Case No. 22-22686), 8 pages	ERT	0.30
08/15/23	Attend (remotely, via Zoom) meeting with D. Gersten, Advisory Board counsel (Jesmany Jomarron, Esq.), and representatives of FirstService Residential (Melissa Vazquez and Alyson Theale), and independent counsel (Melanie Damian, Esq.) to discuss homeowner delinquencies and strategy regarding same (Ms. Damian attended a portion the meeting)	ERT	1.30
08/15/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed today with homeowner Brian Goins	ERT	0.20
08/15/23	Telephone conference with D. Gersten regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed today with homeowner Brian Goins	ERT	0.20
08/15/23	Email correspondence with Adam Slep of Axiom Resources (the Association's collections company, hired pre-receivership) regarding monies due to the Association from Axiom for active cases being handled by Axiom	ERT	0.20
08/15/23	Telephone conference with Association homeowner Brian Goins regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community	ERT	0.40
08/15/23	Email correspondence with Corey Tickner (FirstService Residential) and D. Gersten regarding complaints by homeowner Iraida Gonzalez	ERT	0.30
08/16/23	Review and respond to Leo Lagamasino email re: case .1; review and respond too Eric Thompson email re: open case .1; review and respond to Eric Thompson email re: budget conference .1; conference with Melanie Damian, Eric Thompson and at times Russell Landy re: budget .8; emails with CPA re: availability .1; review and respond to Danilo Batiste email re: Goins issues .1; emails to/from Jesmany Jomarron re: zoom conference .2	DMG2	1.50
08/16/23	[SW 104th Street] - review email from Mr. Jomarron re status of matter and new counsel; emails to and from Mr. Thompson re same; draft email to Mr. Provenzale re status of matter and request for dismissal of matter	LML3	0.40

08/16/23	[Grimm] - exchange of emails with opposing counsel regarding hearing on Receiver's Renewed Motion to Stay	LML3	0.20
08/16/23	Telephone conference with D. Gersten regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.10
08/16/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.40
08/16/23	Telephone conference with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.40
08/16/23	Analyze The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023) (as requested by D. Gersten)	ERT	0.20
08/16/23	Email correspondence with Corey Tickner (FirstService Residential) and D. Gersten regarding complaints by homeowner Iraidia Gonzalez	ERT	0.30
08/16/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq. and Russell Landy, Esq.) to discuss The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023) (Mr. Landy attended a portion of the conference)	ERT	0.80
08/17/23	Review and respond to Pete Cabrera re: MDPD bill .1; review order by Judge Scola re: Cepero .1; email to Eric Thompson and Ken Murena re: Judge Scola order .1; review Damian Valori billing .5; review and respond to Chicky Ardisson and Don Kearns email re: flooding and lighting issues .1; review and edit current draft of collection letter sent by Mellisa Vasquez .5; conference with Eric Thompson re: edits to collection letter .4; review Jesmany Jomarron email with collection templates .3; review and respond to Eric Thompson email re: Cepero course of action .1; review and respond to Corey Tickner email with light fixture quotes and review same .2; email to/from Don Kearns and Chicky Ardisson re: light fixtures .1; email to/from Eric Thompson re: Ken Murena response re: Cepero .1; review and respond to Jesmany Jomarron email re: collections draft letter and translation issues .2; review and respond to emails between Jesmany Jomarron and Melissa Vasquez re: collections letter requirements .1	DMG2	2.90

08/17/23	Prepare Architectural Control Application Determination Forms for pending Architectural Control Applications for approval/denial by the Receiver, including analyze 17 underlying Applications packets for pertinent information to be included on Determination Form (prepared 5 Determination Forms; remaining Applications were missing required information)	ERT	1.30
08/17/23	Analyze Court's 8/17/23 Amended Judgment (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS),1 page	ERT	0.10
08/17/23	Analyze Court's 8/17/23 Order Granting Motion to Vacate and Motion for Clarification (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS),3 pages	ERT	0.10
08/17/23	Email correspondence with D. Gersten regarding strategy going forward in light of Court's 8/17/23 Order Granting Motion to Vacate and Motion for Clarification and 8/17/23 Amended Judgment (in the appeal styled Hammocks Community Association Inc., et al. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	0.30
08/17/23	Analyze and revise draft collections letter (drafted by Melissa Vazquez, FirstService Residential)	ERT	0.90
08/17/23	Telephone conference with D. Gersten regarding his revisions to draft collections letter (drafted by Melissa Vazquez, FirstService Residential)	ERT	0.40
08/17/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding additional information needed to prepare Architectural Control Application Determination Forms for 12 pending Architectural Control Applications	ERT	0.40
08/18/23	Review and respond to ATT email re: installation .1; review and respond to Jesmany Jomarron email re: parking .1; review and respond to Eric Thompson email re: conference with Ken Murena .1; review and respond to Melissa Vasquez email with attachment re: collection letter .1; review and respond to Chicky Ardisson/Danilo Baptista emails re: ACC issues .1; review and respond to Eric Thompson/Danilo Baptista emails re: beach and tree trimming areas of concern .1; conference with Eric Thompson and Ken Murena re: Cepero .3; zoom with Melissa Vasquez, Melanie Damian, Eric Thompson and Jesmany Jomarron re: proposed 1st draft of budget (note Melanie Damian and Melissa Vasquez dropped off the meeting early) 1.2; review Eric Thompson/Jesmany Jomarron emails re: collection letter draft and review and edit same .2; review and respond to Don Kearns email re:	DMG2	2.60

	lighting .1; review and respond to Danilo Baptista email with report attached for review .2		
08/18/23	Telephone conference with D. Gersten and independent counsel (Kenneth Murena, Esq.) regarding strategy going forward in light of Court's 8/17/23 Order Granting Motion to Vacate and Motion for Clarification and 8/17/23 Amended Judgment (in the appeal styled Hammocks Community Association Inc., etal. v. Josue Cepero, et al., Appeal Case No. 22-cv-22686-RNS)	ERT	0.20
08/18/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.), Advisory Board counsel (Jesmany Jomarron, Esq.), and Melissa Vazquez (FirstService Residential) to discuss: 1) The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023); and 2) first collection letter to be sent to homeowners (Ms. Damian attended a portion of the meeting)	ERT	1.20
08/18/23	Analyze and revise current version of collections letter (as revised by Advisory Board counsel, Jesmany Jomarron, Esq.)	ERT	0.10
08/18/23	Email correspondence with Melissa Vazquez (FirstService Residential and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding revisions to and finalization of collections letter	ERT	0.10
08/21/23	Email to Chicky Ardisson re: payment for architect .1; review and respond to email from Don Kearns .1; review and respond to Leo Lagamasino re: Christian Granada's communication .1; review Corey Tickner and Melanie Damian emails re: P-card .1; review and respond to emails between Chicky Ardisson, Corey Tickner and Don Kearns re: lighting and product information .1; conference with Melissa Vasquez re: collections letter .1; review and analyze Adriana Pavon email re: insurance with analysis of differing policies .3; medial to Eric Thompson and Jesmany Jomarron re: insurance policies .1; review multiple Eric Thompson emails re: insurance .2; review and respond to Jesmany Jomarron re: insurance .1; review emails form Eric Thompson and Jesmany Jomarron re: appropriate coverage .2	DMG2	1.50
08/21/23	[Gleason] - receive updated ledger from FSR and forward to opposing counsel with explanation of past due amounts in attempt at resolution	LML3	0.30
08/21/23	Draft answer and affirmative defenses	LML3	0.70
08/21/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.20

08/21/23	Email correspondence with Corey Tickner (FirstService Residential) and D. Gersten regarding complaints by homeowner Iraida Gonzalez	ERT	0.20
08/21/23	Email correspondence with independent counsel (Kenneth Murena, Esq. and Adriana Pavon, Esq.) regarding selection of insurance pursuant to Property & Casualty Proposal prepared by Brown & Brown	ERT	0.10
08/21/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesman Jomarron, Esq.) regarding recommendations as to Property & Casualty Proposal prepared by Brown & Brown	ERT	0.30
08/21/23	Analyze Property & Casualty Proposal prepared by Brown & Brown, 33 pages, in furtherance of advising D. Gersten as to my recommendations regarding same	ERT	0.60
08/22/23	Review and respond to Corey Tickner email re: lighting .1; review emails between Leo Lagamasino and Christian Granada's re: settle case .1; review and respond to Ken Murena email re: insurance option and binder .1; review and respond to Chicky Ardisson email re: lighting .1; review and respond to Ken Murena email re: Cepero .1; review and sign insurance binder .3; review and respond to Danilo Baptist's email re: tree trimming re: Goins property .1; review and respond to Melanie Damian email re: Cruz letter .1	DMG2	1.00
08/22/23	[SW 104th Street] - exchange of emails with opposing counsel where Plaintiff agreed to dismiss suit	LML3	0.20
08/22/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.10
08/22/23	Email correspondence with Corey Tickner (FirstService Residential) and D. Gersten regarding complaints by homeowner Iraida Gonzalez	ERT	0.10
08/23/23	Review and respond to Leo Lagamasino email re: settlement of case .2; review and respond to Russell Landy email re: car in repair shop and what to do .2; review and respond to Pete Cabrera email re: guardrails .1; review and respond to Chicky Ardisson and Corey Tickner emails re: lighting re: architect opinion .1; conference with Eric Thompson and Ken Murena re: Cepero .3; review and respond to Corey Tickner email re: lighting issues re: FPL .1; review and respond to Jesmany Jomarron email(s) re: advisory board .1; review and respond. To Jesmany Jomarron email re: rules for agenda .1; review and respond to Jesmany Jomarron email re: ATT setup .1; review Avid billing for payment(s) .3; reveiw Danilo Baptista email re: projects .1; reveiw and respond to	DMG2	2.40

	Don Kearns email re: 1st class service .1; review Eric Thompson email with updated rules for review .2; reveiw and respond to Russell Landy email with settlement document for review and approval .3; reveiw and respond to Jesmany Jomarron email re: Danilo Batista .1		
08/23/23	[Gleason] - receive email from opposing counsel re settlement; confer with Mr. Thompson re general conditions for settlement; review amounts owed and calculate fees and terms of payment; email to Receiver requesting approval for same with proposed payment plan; receive approval from receiver	LML3	1.20
08/23/23	Prepare Architectural Control Application Determination Forms for pending Architectural Control Applications for approval/denial by the Receiver	ERT	0.90
08/23/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.30
08/23/23	Telephone confernece with homeowner Brian Goins regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community	ERT	0.20
08/23/23	Telephone conference with D. Gersten and independent counsel (Kenneth Murena, Esq.) regarding strategy going forward as to further proceedings in the Cepero bankruptcy case	ERT	0.30
08/23/23	Email correspondence with Corey Tickner (FirstService Residential) and D. Gersten regarding complaints by homeowner Iraida Gonzalez	ERT	0.10
08/23/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding additional information needed to prepare Architectural Control Application Determination Forms for pending Architectural Control Applications, including analyze additional documents provided by Mr. Baptista	ERT	0.40
08/24/23	Review and respond to Don Kearns email re: possum and other issues re: house .1; review and respond to Eric Thompson email with edited rules attached for review and posting .2; review and respond to Eric Thompson email re: ACC issues .1; review and respond to Don Kearns email re: code violations .1; review and respond to Eric Thompson re: Leaf settlement .1; review and respond to Chicky Ardisson email re: cc on all ACC emails .1; review and respond to Leo Lagamasino email to Christian Granada's re: settle case .1; review and respond to. Alyson Theale email .1; review and respond to Eric Thompson email re: Fiol issue .1; review and respond to Eric Thompson email with Cepero	DMG2	1.70

	answer brief. .3; review and respond to Eric Thompson email re: opposing counsel .1; conference with Alyson Theale re: Danilo .3		
08/24/23	[Gleason] - draft settlement offer with terms of dismissal and email to opposing counsel; receive response (.8)	LML3	0.80
08/24/23	[Chapman] - receive case management order and review status of dismissal; confirm case was dismissed and follow up re instructions to team	LML3	0.30
08/24/23	Analyze Appellants' 8/24/23 Reply Brief, 10 pages (in the appeal styled Jose Cepero, et al. v. Hammocks Community Association, Inc., et al., Appel No. 23-cv-21795-RNS)	ERT	0.20
08/24/23	Analyze Miami-Dade Property Appraiser's website for property records pertaining to 10816 SW 147 Court, as well as the Miami-Dade Clerk of Court's website for cases pertaining to that property (and owned Vivian Fiol), with regard to homeowners' complaints about state of disrepair of that property and inquiries as to whether it has been abandoned	ERT	0.40
08/24/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding sets going forward as to homeowners' complaints about the property located at 10816 SW 147 Court	ERT	0.20
08/24/23	Analyze proposed final version of Rules of the Board of Directors of the Hammocks Community Association Incorporated (drafted by Advisory Board counsel (Jesmany Jomarron, Esq.)) prior to posting on Association's website	ERT	0.10
08/24/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding my revisions to proposed final version of Rules of the Board of Directors of the Hammocks Community Association Incorporated (prior to posting on Association's website)	ERT	0.10
08/25/23	Review and respond to Jesmany Jomarron email re: rules	DMG2	0.10
08/25/23	Telephone conferences with Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss complaints by certain Advisory Board members regarding Rules of the Board of Directors of the Hammocks Community Association Incorporated	ERT	0.80
08/26/23	Review and respond to Adrianna Pavon email with information re: cars to sell .2; review and respond to Corey Tickner email re: ACC flowchart .1; review many emails re: finance committee meeting .1	DMG2	0.40



08/27/23	Review and respond to Adrian Pavon email re: check request .1; review and respond to Danilo Baptista email re: work chart for week .2; review and respond to Jesmany Jomarron email re: ATT project .1; email to Eric Thompson and Jesmany Jomarron re: issues .1	DMG2	0.50
08/28/23	Review and respond to Danilo Baptista email re: ATT .1; review and respond to Corey Tickner email re: lighting .1; review and respond to Eric Thompson email re: account closing .1; review and respond to Russell Landry email re: SAO .1	DMG2	0.40
08/28/23	Prepare Architectural Control Application Determination Forms for 6 pending Architectural Control Applications for approval/denial by the Receiver (Jenaro Canales, Meredith Mills, Tony Seute, Todd and Rene Black (2), and Mateo Aquino)	ERT	0.60
08/28/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding additional information needed to prepare Architectural Control Application Determination Forms for pending Architectural Control Applications	ERT	0.30
08/28/23	Email correspondence with independent counsel (Adriana Pavon, Esq.) regarding execution of Account Closure Request (for closure of Popular Bank account)	ERT	0.10
08/28/23	Email correspondence with Danilo Baptista (FirstService Residential) regarding areas of follow-up needed by FirstService Residential in the Association's Coral Club community as discussed with homeowner Brian Goins	ERT	0.10
08/28/23	Analyze Appellees' 8/28/23 Motion to Alter or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686), 9 pages, in furtherance of drafting Response thereto	ERT	0.40
08/28/23	Analyze Appellee's 6/17/22 Motion to Alter or Amend Judgment, for Rehearing, Relief from Judgment and/or Reconsideration as to ECF 480 (filed in the Bankruptcy Court), 8 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Alter or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.20
08/28/23	Analyze Bankruptcy Court's 10/28/21 Order on Sanctions and Setting Further Evidentiary Hearing, 12 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Alter or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.20

08/28/23	Email correspondence with D. Gersten and independent counsel (Kenneth Murena, Esq.) regarding strategy for Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
08/29/23	Review and respond to Mauricio Zuniga email re: install ATT products .1; review and respond to Danilo Baptista email re: roof tile samples .1; review and respond to Ken Murena re:: popular Bank issue .1; review and respond to Chicky Ardisson email re: payment to architect .1; review and respond to email from Reese Setae with attached motion to amend and analyze .3; reveiw and respond to Corey Tickten email re: flowchart and PowerPoint .1; review and respond to Corey Tickten email with attached call logs .1; review and respond to Eric Thompson email re: motion to alter amend .1; review and respond to Russell Landy email with vase management repost and review same .2; review and respond to Alyson Theale re: Danilo replacement .1; review and respond to Russell Landy email re:C .1; review and respond to Eric Thompson email re: ACC issues .1; email to Eric Thompson and Jesmany Jomarron re: exterminator issues .1; review and respond to ATT email re: installation .1; reveiw and respond to Kristen Gurruchari email re: budget meeting and CPA .1; review and respond to multiple email(s) re: drainage issues .2; review and respond to Corey Tickten and Don Kearns email(s) re: FAA issue .1; reveiw and respond to Chicky Ardisson email re: committee issue .1; review and respond to Melissa Vasquez email with budget and time line attachments and review same 1.5; review and respond to Pete Cabrera email re: MDPD payment .1; review and respond to Don Kearns email re: budget .1; email to Melissa	DMG2	4.20
08/29/23	Analyze The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023), as revised by Melissa Vazquez (FirstService Residential) in furtherance of advising Ms. Vazquez as to any necessary revisions	ERT	0.40
08/29/23	Analyze 8/28/23 correspondence from Goldberg Segalla (coverage counsel for Philadelphia Indemnity Ins. Co. regarding the Employee Theft policy issued to the Association), 6 pages, in furtherance of evaluating strategy for steps going forward	ERT	0.30
08/30/23	Review and respond to Jesmany Jomarron email re: projects update .1;review and respond to Adriana Pa von email re: conference .1; review and respond to Don Kearns email re: finance video .1; review and respond to Melanie Damian email with settlement document attached for review .3; review and forward Raydell Garcia email(s) to Eric Thompson and Jesmany Jomarron re: handle issue .1; review and respond to Melanie Damian email with proposed order attached for	DMG2	2.40

review and editing .2; review and respond to Russell Landy email with answers to interrogatories for review and comment .3; review and respond to Corey Tickner email re: Flowtech report .1; review and respond to Jesmany Jomarron email re: ATT project .1; review and respond to CPA email re: finance committee .1; review and respond to Ken Murena email re: Cepero filing .1; review large number of Avid bills for payment .3; review and respond to Ken Murena re: Popular Bank .1; review and respond to Melanie Damian email re: timing of settlement and court approval .1; conference with Ken Murena re: insurance carrier and next steps re: filing suit .3

08/30/23	Analyze and revise draft Agreed Motion to Approve Settlement and Release Agreements Against Certain Former Directors (with regard to the case styled Hon. David M Gersten (ret.) v. Ligia Capielo, et al., Case No. 2023-015588-CA-01), drafted by independent counsel (Melanie Damian, Esq.), 3 pages	ERT	0.10
08/30/23	Analyze and revise draft Settlement Agreement and General Release (with regard to the case styled Hon. David M Gersten (ret.) v. Ligia Capielo, et al., Case No. 2023-015588-CA-01), drafted by independent counsel (Melanie Damian, Esq.), 6 pages	ERT	0.20
08/30/23	Analyze and revise draft Response to Defendants' First Set of Interrogatories (in the case styled Hon. David M Gersten (ret.) v. Rasco Klock Perez & Nieto, P.L., et al., Case No. 2023-016776-CA-01), drafted by independent counsel (Russell Landy, Esq.), 10 pages	ERT	0.20
08/31/23	Review and respond to Eric Thompson email re: ACC documents .1; review and respond to Ken Murena email re: Popular Bank .1; review and respond to Eric Thompson email re: interrogatories .2; review and respond to Eric Thompson and Melanie Damian emails re: motion for court to approve .2; review and respond to Melanie Damian email re: settlement agreement .1; review and forward Betty Gonzalez email to legal team re: threatening letter .2; review and forward Yeris Gurida email to legal team re: roof .1; review and respond to Jesmany Jomarron email re: Randell issue .1; review and respond to Reese Setae emails re: bankruptcy orders .1; review and respond to Pete Cabrera email re: fence issue .1; review and send Angel Sanchez email to legal team re: roofing issue .1; review and respond Eric Thompson email re: Juaregi hearing .1; review and respond to Donald Kearns email(s) re: roofing issue .1; review and respond to Eric Thompson email re: budget .1; review and respond to Melanie Damian with revised settlement agreement attached for review and approval .3; review and approve Avid billing .1; review and respond to Melanie Damian and Eric Thompson email(s) with included language for the settlement agreement .1; review and forward Marcoantonio email to Eric	DMG2	2.30

Thompson; reveiw and forward ATT emails re: project to Jesmany Jomarron .1

08/31/23 Telephone conference with independent counsel (Melanie Damian, Esq.) regarding additional revisions to Settlement Agreement and General Release (with regard to the case styled Hon. David M Gersten (ret.) v. Ligia Capielo, et al., Case No. 2023-015588-CA-01), drafted by independent counsel (Melanie Damian, Esq.) ERT 0.20

### Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	665.00	56.60	37,639.00
ERT	Eric Thompson	Partner	380.00	58.70	22,306.00
LML3	Leonor Lagomasino	Partner	332.50	36.90	12,269.25

TOTAL FOR SERVICES	\$76,050.00
LESS DISCOUNT	-3,835.75
TOTAL FEES	\$72,214.25

### Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/23/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-242-45189 DATE: 9/1/2023 FedEx service for 824245189,782833399842,Delivery service fees of 30.77 to Meagan Barad, 2950 N 28TH TER/HOLLYWOOD FL 33020 re: 5539/matter id 1292668	30.77
	TOTAL EXPENSES	\$30.77

### Outstanding Statements as of September 28, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21387877	August 18, 2023	\$63,187.64
<b>Total Accounts Receivable Balance:</b>		<b>\$63,187.64</b>

David Gersten Special Magistrate  
ID: GERSP 1292668  
Invoice No.: 21415052

September 28, 2023  
Page 24

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

September 28, 2023  
ID: GERSP 1292668  
Invoice No. 21415052  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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**BILLING SUMMARY THROUGH August 31, 2023**

Fees For Professional Services:	\$76,015.00
LESS DISCOUNT	-3,800.75
Total for Professional Services:	72,214.25
Expenses and Advances:	<u>30.77</u>
<b>Current Bill:</b>	<b>\$72,245.02</b>

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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: 21415052

**REMITTANCE COPY**  
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

October 12, 2023  
ID: GERSP 1292668  
Invoice No. 21424055  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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## BILLING SUMMARY THROUGH September 30, 2023

Fees For Professional Services:	\$55,620.00
LESS DISCOUNT	-\$2,781.00
Total for Professional Services:	\$52,839.00

Expenses and Advances:	<u>\$73.30</u>
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**Current Bill: \$52,912.30**

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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>
09/01/23	Attend (remotely, via Zoom) Case Management Conference in the case styled Hammocks v. Jauregui Law P.A., Case No. 2023-018690-CA-01 (attend as representative of the Receiver, as required by Local Rules)	ERT	0.30
09/01/23	Email correspondence with Tindependent counsel (Melanie Damian, Esq.) regarding proposed finalized Settlement Agreement and General Release (with regard to the case styled Hon. David M Gersten (ret.) v. Ligia Capielo, et al., Case No. 2023-015588-CA-01)	ERT	0.10
09/03/23	[LaVoie quiet title action] - review pleadings and follow up with FSR re past due amounts to file surplus claims; review statute and notice re applicable deadlines (.3); [Sanibel Realty] - follow up with Mr. Dante re status (.2); [SW 104th Street] follow up with opposing counsel re dismissal (.2); [Navas] - prepare status report to receiver re trial preparation (.2)	LML3	0.90
09/04/23	Review and respond to Jesmany Jomarrin email re: PowerPoint/report .1	DMG2	0.10
09/05/23	Review and respond to Ken Murena email re: cases .1	DMG2	0.10
09/05/23	[Navas] - emails to and from FSR re status of trial starting 9/28 and request for updated ledger; coordinate getting my NOA on file and update pleadings; emails to and from Mr. Sonnenfeld re meet and confer re no dispute as to amounts owed to HCA (.7); [Fuentes] - review complaint; telephone conference with Plaintiff's counsel re different entities sued and relationship to HCA; email to Plaintiffs' counsel confirming extension to respond to complaint (.6)	LML3	1.30
09/05/23	[Gleason] - emails to and from opposing counsel re agreement to settle claim (.2) ; [SW 104th] - review proposed order of dismissal and email to opposing counsel approving same (.1)	LML3	0.30
09/05/23	Analyze Appellees' Brief, 36 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.30
09/05/23	Analyze transcript of 7/14/22 hearing in front of Bankruptcy Court's, 39 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in AppealCase No. 22-22686)	ERT	0.40



09/05/23	Analyze Appellees' 8/7/23 Renewed Motion to Vacate "Judgment" Entered July 20, 2023 as Void, 9 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/05/23	Analyze Appellees' 6/26/23 Motion for Rehearing, 16 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.20
09/05/23	Analyze Court's 7/20/23 Order Denying Motion for Rehearing, 4 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/05/23	Analyze Appellees' 8/15/23 Response to Appellant's Response to Renewed Motion to Vacate, 8 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/05/23	Begin to draft Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686) (draft the following section: 1) Section I-Preface, p. 1; begin to draftthe following section: 1) Section II-Background, pp. 2-8)	ERT	0.50
09/06/23	Review and respond to Corey Tickner email re: drainage issues .1; review and respond to Leo Lagamasino email re: Navratilova trial .1; review and respond to Reese Setae email re: Navarro bankruptcy .1; review and respond to Corey Tickner email re: pool issues .1; review and respond to Christian Granada's email re: settle case .1; review and respond to Corey Tickner email re: sand replacement for lakes .1; review and respond to Adriana Pavon email re: case updates relating to cases re: bankruptcy .2; review and respond to Corey Tickner email re: updates .1; review and respond to Melissa Vasquez email re: ledger .1; review and respond to Reese Setae email re: motion for more definite statement .1; review and respond to Melanie Damian email re: report .1; review and respond to Eric Thompson email re: Turf invoice .1; review and respond to Melissa Vasquez email re: budget draft .1; review and respond to Reese Setae email re: Trujillo bankruptcy order .1; review and respond to Russell Landry email re: draft letter to County .2; review and respond to Leo Lagamasino email re: Midfirst Bank case .1; review and respond to Russell Landry email re: Alfaro hearing .1; review Michael Provenzale email re: case .1; reveiw Don Kearns email	DMG2	2.90

	re: agenda .1; review Gary Sonnenfeld email re" case and payment .1; review and respond to Melissa Vasquez email re: minutes .1; review and respond to Melanie Damian email re: hearing date .1; review and respond to Melanie Damian email re: settlement .1; r		
09/06/23	[Navas] - further communications with Mr. Sonnenfeld re stipulation; receive updated ledger and further information re potential witness from FSR (.3); [Toorak] emails to and from FSR re ledgers .2	LML3	0.50
09/06/23	Analyze Court's 7/20/23 Judgment, 1 page, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/06/23	Analyze Court's 8/17/23 Amended Judgment, 1 page, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/06/23	Analyze Court's 8/17/23 Order Granting Motion to Vacate and Motion for Clarification, 3 pages, in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686)	ERT	0.10
09/06/23	Continue drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686) (finish drafting the following section: 1) Section II-Background, pp.2-8; begin to draft the following section: 1) Section III-Memorandum of Law, pp. 9-14)	ERT	3.90
09/06/23	Analyze competing pool pump proposals by D's Pools and Florida's Bright & Blue Pools & Beach Service, including email correspondence with D. Gersten regarding my recommendations as to same	ERT	0.20
09/07/23	Review and respond to Corey Tickner email re: Turf proposal .1; reveiw and respond to Chicky Ardisson email re: talk .1; review and respond to Corey Tickner email re: inviting vendors .1; reveiw and respond to Eric Thomp0son email re: finance committee .1; review and respond to Eric Thompson email(s)n re: hearing re: case management .1; reveiw and respond to Jesmany Jomarron email(s) re: ATT .1; review and respond to Corey Tickner email re: agenda .1	DMG2	0.70
09/07/23	[Navas] - email to Mr. Dante re impact of prior bankruptcy by Navas; search court docket for Ch. 13 filings to send to Mr. Dante and forward same; further emails with Ms. Pavon re impact of bankruptcy discharge (.4) ; [Toorak] receive ledgers and forward same to Ms. Aron (.1)	LML3	0.50

09/07/23	Attend (remotely, via Zoom) Case Management Conference in the case styled Hammocks v. Alfaro & Fernandez, P.A., et al., Case No. 2023-016876-CA-01 (attend as representative of the Receiver, as required by Local Rules)	ERT	0.10
09/07/23	Analyze Florida federal case law addressing the impropriety of using a Rule 59(e) motion to re-argue issues already argued (in furtherance of drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law, in Appeal Case No. 22-22686), including analyze the following case law: 1) Schwade v. Total Plastics, Inc. (MD Fla. 2011) 22 pages; 2) U.S. v. Kaplan Univ. (SD Fla. 2017) ,3 pages; 3) Smith v. Secretary, Dep't of Corr. (MD Fla. 2007) ,9 pages; and 4) Quitto v. Bay Colony Golf Club, Inc. (MD Fla. 2007), 2 pages	ERT	0.60
09/07/23	Finish drafting Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No. 22-22686) (finish drafting the following section: 1) Section III-Memorandum of Law, pp. 9-14)	ERT	4.10
09/07/23	Analyze competing tree removal proposals by Turf Management and EcoLawn, including email correspondence with D. Gersten regarding my recommendations as to same	ERT	0.20
09/08/23	Email correspondence with independent counsel (Kenneth Murena, Esq.) regarding and attaching draft Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No.22-22686), for his review and approval	ERT	0.10
09/09/23	Review email from Leo Lagamasino to Ken Murena re: Bankruptcy issues in Navra case .1; review and respond to Eric Thompson email with draft response to motion for editing .4; review and respond to emails sent by Juan Franco and Corey Tickner re: access/security/FSR .1; review and respond to Corey Tickner re: tress/stump grinding .1; review and respond to Leo Lagamasino email re: exhibit for case .1; review and respond to Adriana Pavon email re: sale of cars/unwrap .1; review and respond to Corey Tickner re: action items .1; review and approve Avid billing .2; review and respond to Ken Murena with attached report and insurance issues .2	DMG2	1.40
09/11/23	Review and approve billing through Avid system .3; review and edit current draft of response re: Cepero .3; review and respond to to Corey Tickner email re: dog waste .1; review no respond to Corey Tickner email re: Turf/Ecolawn .1; review no respond to Juan FRanco email re: amenities .1; zoom conference with FSR, Melanie Damian, Eric	DMG2	2.20

Thompson and Jesmany Jomarron re: proposed budget and legal issues 1.3			
09/11/23	Attend (remotely, via Zoom) meeting with D. Gersten, independent counsel (Melanie Damian, Esq.), Advisory Board counsel (Jesmany Jomarron, Esq.), Melissa Vazquez (FirstService Residential), and Alyson Theale (FirstService Residential) to discuss: 1) The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023); and 2) between the legal team only, pending legal issues	ERT	1.30
09/11/23	Revise, in accordance with comments by independent counsel (Kenneth Murena, Esq.), Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No.22-22686) and finalize siad Response for filing	ERT	0.40
09/11/23	Revise, in accordance with comments by D. Gersten, Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No.22-22686)	ERT	0.10
09/12/23	Review and respond to Eric Thompson email re: motion/fees re: Cepero .1; review and respond to Ken Murena/Eric Thompson email(s) re: response .1; review and respond to Jesmany Jomarron email re: exterminator .1; review and respond to Eric Thompson email re: exterminator .1; review and respond to Adriana Pavon email re: sale of cars .1; reveiw and respond to Russell Landry email re: expert witness .1; review and respond to Corey Tickner and others emails re: website update .1; review and respond to Corey Tickner email re: update of neighborhood names .1; review and respond to Russell Landry email re: expert .1	DMG2	0.90
09/12/23	[Lavoie] - draft answer to complaint; email to opposing counsel serving complaint because it could not get filed electronically	LML3	0.80
09/13/23	Review and respond to Alyson Theale email re: staffing .1; review Chicky Ardisson email(s) re: roofing .1; review and respond to Corey Tickner emails re: access cards .1; review email(s) between Chicky Ardisson, Kristen Gurruchari and Corey Tickner re: wall painting .1; review and respond to Corey Tickner email re: update .1; review and respond to Don Kearns email re: paint/ACC .1; review and respond to Adriana Pavon email re: sale of cars .1; email to Eric Thompson re: case updates .1; review and respond to Kristen Gurruchari email re: walls .1; review and respond to Adriana Pavon email re: car sales .1; review and respond to Leo Lagamasino email re: case update .1; review and respond to Melanie Damian email re: insurance coverage .1; review	DMG2	1.90

	reply to response in Cepero case .2 ; review and respond to Adriana Pavon email with updated car information .1; review and respond to Adriana Pavon email re: Axiom payments .1; review and respond to Eric Thompson email re: Axiom payments and ledger information .1; review and respond Anthony Cerrone email re: ACC issues .1; review and respond to Adriana Pavon email re: Lujan case issue .1		
09/13/23	[Fuentes] - emails to and from FSR re relationship if any between HCA and two other defendants in this case; prepare answer on behalf of HCA to foreclosure action (.8)	LML3	0.80
09/13/23	[Navas] - forward leger to the parties; extensive phone call with Plaintiff's counsel re history of case, procedures and his plan on proceeding at trial; follow up with FSR re witness at trial; revise witness and exhibit list	LML3	1.10
09/13/23	[Navas] - emails to and from Plaintiff's counsel requesting continuance	LML3	0.10
09/13/23	Analyze Appellees' 9/13/23 Reply to the Association's Response to Appellees' 8/28/23 Motion to Atler or Amend Amended Judgment Entered August 17, 2023 and Incorporated Memorandum of Law (in Appeal Case No.22-22686), 4 pages	ERT	0.10
09/13/23	Email correspondence with Adam Slep (Axiom Resources, the Association's collections company, hired pre-receivership) and independent counsel (Adriana Pavon, Esq.) regarding status of Axiom's efforts to obtain updated account information from FirstService Residential (in light of recent complaint by homeowner, Arthur Calvin, that Axiom was attempting to collect based upon incorrect account information)	ERT	0.30
09/14/23	Review and respond to Don Kearns email re: FSR issues .1; review and respond to Jesmany Jomarron email re: finance committee meeting .1; review and respond to Avid billing payment and review same .2; reveiw and respond to Corey Tickner email re: several items re: P-card and agenda .1; conference with Jesmany Jomarron and a times Don Kearns re: legal and agenda issues 1.2	DMG2	1.70
09/14/23	[Interians] - receive request from Ms. Aron re getting updated amounts owed; emails to and from FSR re same	LML3	0.30
09/14/23	Telephone conference with D. Gersten to discuss legal issues and preparation for 9/19/23 Board meeting	ERT	0.30
09/15/23	Email to Jesmany Jomarron re: posting agenda .1; review and respond to Jesmany Jomarron email re: ATT .1; review and respond to Eric Thompson email re: billing .1; review and respond to Melissa David	DMG2	4.20

email re: update .1; review and respond to Alyson Theale email re: conference .1; review and respond to Eric Thompson email re: updates .1; conference with Eric Thompson and Jesmany Jomarron in preparation for upcoming advisory boards meeting 1.5; review and respond to Soneet Kaplila email with bill for review .2; review and respond to Chicky Ardisson email re: landscape issue .1; review and respond to Corey Tickten email re: pool updates .1; conference with Alyson Theale re: FSR issues 1.1; review and respond to Jesmany Jomarron email re: updated chart .1; review and respond to Jesmany Jomarron email re: survey issue .1; review and respond to Jesmany Jomarron email re:survey issues .1; review and respond to Jesmany Jomarron email re: advisory board meeting .1 ; review and respond to Eric Thompson email re: insurance issues .1; review and respond to Eric Thompson email re: lake issue .1

09/15/23	[Interians] - emails to and from FSR re information request	LML3	0.20
09/15/23	Begin to draft outline of items for the Receiver's Report and items of new business (to be discussed during 9/19/23 Advisory Board meeting), 7 pages	ERT	2.30
09/15/23	Email correspondence with Melissa Davis (Kapila Mukamal - forensic accountants) regarding additional information needed from Kapila in preparation for 9/19/23 Advisory Board meeting	ERT	0.10
09/15/23	Analyze all email correspondence with Adriana Pavon, Esq. (independent counsel) since 8/8/23 since 8/8/23 regarding sale of the Association's unneeded vehicles (in furtherance of drafting outline of items for the Receiver's Report and items of new business, to be discussed during 9/19/23 Advisory Board meeting)	ERT	0.30
09/15/23	Analyze all email correspondence with FirstService Residential since 8/8/23 in furtherance of drafting outline of items for the Receiver's Report and items of new business (to be discussed during 9/19/23 Advisory Board meeting)	ERT	1.20
09/15/23	Telephone conference with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss legal issues and upcoming 9/19/23 Advisory Board meeting	ERT	1.50
09/15/23	Email correspondence with Corey Tickner (FirstService Residential) regarding additional information needed to prepare for 9/19/23 Advisory Board meeting	ERT	0.10
09/15/23	Email correspondence with Melissa Vazquez (FirstService Residential) regarding additional information needed to prepare for 9/19/23 Advisory Board meeting	ERT	0.20

09/15/23	Email correspondence with Corey Tickner (FirstService Residential) regarding additional information needed to prepare Architectural Control Application Determination Forms for Architectural Control Applications previously provided by Danilo Baptista(FirstService Residential)	ERT	0.30
09/15/23	Analyze on-line dockets of all pending cases filed by the Receiver against the Association's former attorneys (in furtherance of drafting outline of items for the Receiver's Report and items of new business to be discussed during 9/19/23 Advisory Board meeting)	ERT	0.20
09/16/23	Review and respond to Alyson Theale email re: updates .1; review and respond to Jesmany Jomarron email re: chart .1; review and respond to Corey Tickner email re: drainage update .1; reveiw and respond to JC Peralta email re: meeting dates/times .1; review and respond to Jesmany Jomarron email re: meeting issues .1; review and respond to Eric Thompson email re: insurance .1; review and respond to Alyson Theale email re: points for meeting.1; review and respond to Jesmany Jomarron re: finance committee .1	DMG2	0.80
09/16/23	[Kendall Club] - follow up with FSR for request for ledgers .1; [Vazquez] - follow up with FSR for request for ledgers .1 ; [Suarez] - follow up with FSR for request for ledgers .1 ; [Velez] follow up with FSR for request for ledgers	LML3	0.40
09/18/23	Review, respond and forward Corey Tickner email re: ACC appeal .1; review and respond to Eric Thompson email re: color tiles/FSR .1; review and respond to Melissa Vasquez email with existing contracts for review and dissemination to finance committee .3; review and respond to Melissa Vasquez email re: MDPD payment .1; review and respond to Melissa Vasquez email re: outstanding payments due .1; review and edit draft of receiver's report for tomorrow's AB meeting 1.3 ; review and respond to Russell Landy email re: homeowner ACC issue .1; conference with Eric Thompson re: information .2; conference with Melanie Damian and Eric Thompson re: budget 1.1; review and respond to Melanie Damian email re: report issuance .1; review and respond to Corey Tickner email re: pool issues .1; review and respond to Melanie Damian email re: report .1; review and respond to Corey Ticketing email re: pools .1; review and respond to Melanie Damian re: auditing .1; review and respond to Corey Ticketing email re: lighting proposal re: license and insurance .1; review and edit next draft of receiver's report .6	DMG2	4.60
09/18/23	Update to do chart and prepare status report for Receiver	LML3	2.20
09/18/23	[Fuentes] - receive notice of voluntary dismissal (.1) ; [Itinerians] -	LML3	0.30

	receive and provide additional information to FSR; report same to Ms. Aron (.2); [Arancibia] - draft follow up email to opposing counsel re interest in resolving case (.2)		
09/18/23	Analyze memorandum provided by Melissa Davis (Kapila Mukamal - forensic accountants) regarding status of Kapila's analysis, 2 pages, in preparation for 9/19/23 Advisory Board meeting	ERT	0.20
09/18/23	Analyze memorandum drafted by L. Lagomasino regarding status of pending foreclosure cases involving the Association 6 pages, in preparation for 9/19/23 Advisory Board meeting	ERT	0.20
09/18/23	Telephone conference with D. Gersten and independent counsel (Melanie Damian, Esq.) to discuss: 1) D. Gersten's comments/revisions to outline of items for the Receiver's Report and items of new business (to be discussed during 9/19/23 Advisory Boardmeeting); and 2) The Hammocks Community 2023 Amended Proposed Estimated Budget (April 1, 2023 -December 31, 2023 (Ms. Damian attended only a portion of the conference)	ERT	0.80
09/18/23	Email correspondence with Corey Tickner (FirstService Residential) regarding additional information needed to prepare for 9/19/23 Advisory Board meeting	ERT	0.40
09/18/23	Finish drafting outline of items for the Receiver's Report and items of new business (to be discussed during 9/19/23 Advisory Board meeting), 7 pages	ERT	4.10
09/19/23	Review and respond to Alyson Theale email re: delinquencies .1; review and respond to Gustavo Hidalgo email re: Lights .1; review and respond to Eric Thompson email re: Turf bill .1; review and respond to J.C. Peralta email re: financials .1; review and respond to Corey Tickner email re: lighting/Goins issue .1; review and respond to Jesmany Jomarron email re: ATT .1; review and respond to Anthony Sevone email re: ACC issues .1; review and respond to Corey Tickner email re: electrician credentials .1; conference and test zoom session with Jesmany Jomarro and Eric Thompson 1.7; review and forward email from lawyer re: Aranciba foreclosure case .1; review and respond to Corey Tickner email re: license .1; review and respond to Anthony Serrone email re: ACC .1; conference with Don Kearns re: issues .9; final preparation for and attend advisory board meeting 3.5; review Corey email with weekly report .1; review Leo Lagamasino email re: case .1; conference with Chicky Ardisson .4	DMG2	7.80
09/19/23	[Arancibia] - Receive response to email (directed to the Receiver) and follow up with FSR re status of payments .3; [Itinerians] - emails to and from Ms. Aron re status; follow up with FSR (.2)	LML3	0.50



09/19/23	Email correspondence with Corey Tickner (FirstService Residential) regarding additional information needed to prepare for 9/19/23 Advisory Board meeting	ERT	0.20
09/19/23	Email correspondence with L. Lagomasino regarding status of pending foreclosure cases involving the Association that she is handling (in preparation for 9/19/23 Advisory Board meeting)	ERT	0.20
09/19/23	Email correspondence with outside counsel (Maia Aron, Esq.) regarding status of pending foreclosure cases involving the Association that she is handling (in preparation for 9/19/23 Advisory Board meeting)	ERT	0.10
09/19/23	Revise/supplement outline of items for the Receiver's Report and items of new business (to be discussed during 9/19/23 Advisory Board meeting) to incorporate additional information provided by L. Lagomasino, outside counsel (Maia Aron, Esq.), and Corey Tickner (FirstService Residential)	ERT	0.30
09/19/23	Attend (remotely, via Zoom) meeting with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss preparation for tonight's Advisory Board meeting	ERT	1.70
09/19/23	Attend (remotely, via Zoom) Advisory Board meeting	ERT	3.20
09/20/23	Review and respond to Adriana Pavon email re: sale of cars to CarMax .1; review and respond to Don Kearns email re: ACC issue .1; review and respond to JC Peralta email re: ADA issue .1; review and respond to Corey Tickten email re: Romero issue .1; review and respond to Don Kearns re: Santiago Villarreal email re: Lighting .1; review Chicky Ardisson email re: appeal of ACC .1; review Chicky Ardisson email re: EV chargers .1; review Chicky Ardisson email re: Oak Lake application .1; review and respond to Pete Cabrera email re: fence issue .1; review and respond to Jesmany Jomarron email re: metal roofs .1; review and respond to Eric Thompson email re: ACC appeal .1; review and respond to Jesmany Jomarron email re: hurricane shutters .1; review and respond to Jesmany Jomarron email re: governing documents committee .1; review and respond to Eric Thompson email re: ADA issue .1	DMG2	1.40
09/21/23	Review and respond to Corey Ticktin email re: approvals for contracts .1; review and respond to Jesmany Jomarron re: finance committee documents .1; review and respond to Eric Thompson email re: ADA and liability .1; review and respond to Leo Lagamasino email re: lis pendent .1; conference with Jesmany Jomarron and Eric Thompson re: ACC issues and other board related issues .5; review and respond to Tony Cheriea re: ACC issue .1; review and respond to JC Peralta email	DMG2	2.40

re: color information .1; review and respond to Christian Granados email re: settlement documents .1; review and respond to Adriana Pavon email re: Navos bankruptcy .1; review and respond to Jesmany Jomarron email re: Chicky approval .1; review and respond to Corey Ticktin email re: Maybelle O'Neil .1; review and respond to Jesmany Jomarron email re: shutter approval .1; review and respond to Jesmany Jomarron email re: SAP issue .1; review and respond to Elvira Aleman email re: estoppel .1; review and respond to Jesmany Jomarron email re: Rodriguez ACC issue .1; review and respond to Jesmany Jomarron email re: exterminator issue .1; review and respond to Leo Lagamasino email re: response re: amount due .1; review and respond to Jesmany Jomarron re: exterminator issue .1; review and respond to Leo Lagamasino email re: amount owed .1; review and respond to Jesmany Jomarron email re: governing documents issue .1

09/21/23	[Hernandez, Maria] Review prior emails with closing agent for sale of this property and exchange numerous emails with same regarding release of lien and lis pendens; emails to and from MSR requesting ledger balance; review Receiver's pending and closed files for this matter (could not locate); emails to closing agent re status of foreclosure action; review estoppel report submitted by closing agent; review ledger submitted by FSR (conflicts with agent's) and attempt to reconcile same	LML3	1.80
09/21/23	[Gleason] - Draft settlement agreement	LML3	0.80
09/21/23	[Navas] - Receive email from Ms. Pavon re bankruptcy status	LML3	0.10
09/21/23	[Canfux] - Attend case management conference (.4)	LML3	0.40
09/21/23	[9117 SW 151st Court] - Review analysis by Ms. Pavon to resolve matter; emails to and from Ms. Pavon re request for further information; emails to and from Receiver re same	LML3	0.60
09/21/23	Analyze the Americans with Disabilities Act Complaint in the matter styled Nigel Frank De La Torre Pardo v. Samowitz & Klein No. 2 for Kendall, LLC, Case No. 1:23-cv-23030, 9 pages, to evaluate for potential liability of the Association	ERT	0.10
09/21/23	Analyze the on-line docket of the case styled Nigel Frank De La Torre Pardo v. Samowitz & Klein No. 2 for Kendall, LLC, Case No. 1:23-cv-23030, 9 pages, to evaluate for potential liability of the Association	ERT	0.10
09/21/23	Attend (remotely, via Zoom) Case Management Conference in the case styled Hammocks v. Alfaro & Fernandez, Case No. 2023-016876-CA-01 (attend as representative of the Receiver, as required by Local Rules)	ERT	0.30

09/21/23	Telephone conference with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss Architectural Control Committee issues and Americans with Disabilities Act Complaint potentially implicating Association liability	ERT	0.40
09/21/23	Email correspondence with Corey Tickner (FirstService Residential) regarding additional information needed to evaluate Architectural Control Application for homeowner Mabelie Jaramillo O'Neal	ERT	0.10
09/21/23	Analyze Architectural Control Application package for homeowner Mabelie Jaramillo O'Neal (in furtherance of further evaluating same following the ACC's denial of that Application, as requested by the homeowner)	ERT	0.10
09/22/23	Review and reply to Eric Thompson email re: Nicholson ACC issue .1; review and respond to Eric Thompson email re: roff ACC issue .1; review and respond to Eric Thompson email re: Abeló ACC issue .1; review and respond to Leo Lagamasion email re: estoppel issue .1; review and respond to Eric Thompson email re: Rodriguez ACC issue .1; review and respond to Eric Thompson email re: Jone ACC issue .1; review and respond to Jsmay Jomarron email re: billing .1; review and respond to Eric Thompson email re: Fadhel ACC issue .1; review Tony China email re: Nicholson ACC issue .1; review Tony China email re: Sanchez ACC issue .1; review Tony China email re: Abeló ACC issue .1; review and respond to Chicky Ardisson email re: notice of absence .1; review Tony China email re: Jones ACC issue .1; review and respond to Eric Thompson email re: ACC applications .1	DMG2	1.40
09/22/23	[Navas] - Receive trial order; numerous emails among parties; advise Plaintiff his motion was filed in wrong court; receive communications with court; receive confirmation case was continued	LML3	0.30
09/22/23	[Hernandez, Maria] - Exchange numerous emails with closing agent regarding past due amounts and discrepancy; follow up with FSR re same; review court docket to locate closed foreclosure matter; draft release of lien; draft release of lis pendens (1.7); [Arancibia] - follow up with FSR re ledger and provide further information .2	LML3	1.90
09/22/23	Email correspondence with Advisory Board counsel (Jesmany Jomarron, Esq.), Corey Tickner (FirstService Residential), and D. Gersten regarding certain pending Architectural Control Applications, including additional information needed to prepare, as appropriate, Determination Forms for same (including, but not limited to, with regard to homeowners, Zaida Nicholson, Lisa Jones, Mabelle O'Neal, Eloise Rodriguez, Yanet Albelo, and Miguel Fadhel)	ERT	1.20
09/24/23	Review and respond to Maia Aron email with memo und suggested	DMG2	0.40

	course of action .3; review and respond to multiple emails re: budget questions .1		
09/25/23	Email to Kristen dn CPA re: notes .1; review Leo Lagamasino email re: settlement .1; email to Eric Thompson re: discuss settlement .1; review Maia Aron email(s) re: course of action .1; review Reesa Seate email re: hearing notice .1; review and respond to Elvira Aleman email re: case .1; review and respond to Jesmany Jomarron email re: notice of violation and review same .3; review Eric Thompson (and others) email(s) re: ACC issues .1; review and respond to Eric Thompson and Chicky Ardisson email re: ACC applications .1; review and respond to Jesmany Jomarron and Eric Thompson email re: rules .1; review and respond to Ken Murena email re: attend hearing .1; conference with Eric Thompson re: multiple legal issues .3; review and respond to Leo Lagamasino Emil re: Naval case .1; review and respond to Leo Lagamasino re: trial evidence .1; email to Melanie Damian re: violation .1; review and respond to Leo Lagamasino email re: Gleason case .1; review and respond to Leo Lagamasino email re: Lavoie case .1	DMG2	2.10
09/25/23	[Hernandez, Maria] Exchange emails to and from closing agent forwarding draft releases for approval ; follow up with FSR re recording fee charges (.6); conference call with FSR regarding how DSR determined which liens should be released per Xcel spreadsheets; concluded new assessments must be made to take into account payments made to cure lien default but potential subsequent delinquencies; review prior spreadsheets re same analysis; update Receiver re same (1.3); [Gleason] discuss with FSR how scheduled payments are handled; revise Gleason agreement accordingly (4); emails to and from Receiver re how FSR handles scheduled payments and possible additional fees being owed (.2)	LML3	2.50
09/25/23	Email correspondence with Corey Tickner (FirstService Residential) and Chicky Ardisson (Advisory Board member) regarding and attaching Determination Forms on Architectural Control Applications for homeowners Yanet Albelo, Marbelle Jaramillo, Zaida Nicholson, Lisa Jones, Angel Sanchez, and Raul Romero	ERT	0.30
09/25/23	Email correspondence with Advisory Board counsel (Jesmany Jomarron, Esq.) and Rony China (FirstService Residential) regarding certain pending Architectural Control Applications (including, but not limited to, with regard to homeowners, Angel Sanchez and Raul Romero)	ERT	0.20
09/25/23	Analyze Architectural Control Application packets (and prepare accompanying Determination Forms) for homeowners Yanet Albelo, Marbelle Jaramillo, Zaida Nicholson, Lisa Jones, Raul Romero, and Angel Sanchez	ERT	0.90

09/25/23	Analyze memorandum prepared by independent counsel (Maia Aron, Esq.) regarding her analysis of and recommended strategy going forward as to the case styled Hammocks Community Assoc. v. Interians, Case No. 2022-13543, 2 pages	ERT	0.10
09/25/23	Email correspondence with D. Gersten regarding independent counsel, Maia Aron's analysis of and recommended strategy going forward as to the case styled Hammocks Community Assoc. v. Interians, Case No. 2022-13543	ERT	0.10
09/25/23	Telephone conference with Advisory Board counsel (Jesmany Jomarron, Esq.) to discuss: 1) Mr. Jomarron's draft Notice of Violation as to Carlos Villalobos, including my revisions to same; and 2) issues relating to certain pending Architectural Control Applications	ERT	0.90
09/25/23	Analyze Architectural Control Application packets (and prepare accompanying Determination Forms) for homeowners Yolanda Jurado, Sebastian Arias, and Octavio Castillo	ERT	0.30
09/26/23	Review and respond to Eric Thompson email re: payments .1; review and respond to Leo Lagamasino email re: settlement .1; review and respond to Melanie Damian email re: rule violation .1; review and respond to Leo Lagamasino email re: release of liens .1; email(s) to Melanie Damian, Eric Thompson and Jesmany Jomarron with email strings re: rule violation .3; review and respond to Jesmany Jomarron re: appearance of impropriety .1; review and respond to Leo Lagamasino email re: continued trial date .1; review and respond to Leo Lagamasino email re: Notary issue .1; review and respond to Chicky Ardisson email re: tree trimming .1; review and respond to Jesmany Jomarron email re: agenda .1; review and respond to Jesmany Jomarron email re: trial issue .1; review CPA email with comments to proposed budget .1	DMG2	1.40
09/26/23	[Navas] Email to client re status of trial being postponedes .2; 11570 SW 148 Court - numerous emails to and from FSR and opposing counsel re whether wire transfer was applied (no evidence of wire) .4	LML3	0.60
09/26/23	Email correspondence with L. Lagomasino regarding status of certain pending foreclosure cases involving the Hammocks that she is handling	ERT	0.20
09/27/23	Review and respond to CPA email .1; email to/from Melanie Damian email re: article .1; conference with CPA re: upcoming budget meeting .4; review emails from Christian Granados and Eric Thompson re: settlement .1; review emails for Jesmany Jomarron, Chicky Ardisson and others re: trimming on Kendall Dr. .1; review emails from Chicky Ardisson and others re: umbrellas .1; review and respond to Leo	DMG2	2.20

Lagamasino email re: ZIm property .1; review and respond to Ken Murena email (with letter and complaint attached for review pre-filing) .3; review Eric Thompson and Tony China emails re: ACC applications .1; review multiple finance committee members' emails re: tonight's budget meeting .1; review Chicky Ardisson and others' emails re: upcoming ACC meetings .1; review multiple emails from CPA, Jesmany Jomarron and others re: correcting proposed budget and review corrected proposed budget .3; review and respond to Melanie Damian, Jesmany Jomarron and Eric Thompson's email re: notice and posted and review same .3

09/27/23	[Hernandez, M] Revise Release of lien and release of lis pendens per underwriters request; due to last minute changes to releases, and need to fund same day, LML required to find post-hours notary in downtown Miami, including going to banks, post office, fed-ex and Ingraham building ;emails to and from closing agent keeping he apprised of same	LML3	3.80
09/27/23	Attend (remotely, via Zoom) Finance Committee meeting	ERT	2.00
09/27/23	Email correspondence with Corey Tickner (FirstService Residential) regarding and attaching Determination Forms on Architectural Control Applications for homeowners Eloise Rodriguez, Octavio Castillo, Yolanda Jurado and Sebastian Arias)	ERT	0.20
09/27/23	Analyze Architectural Control Application packet (and prepare accompanying Determination Form) for homeowners Eloise Rodriguez	ERT	0.10
09/28/23	Conference with CPA post-budget meeting .3; review and respond to Jesmany Jomarron communications post-budget meeting .1; review and respond to Eric Thompson email re: settlement .1; review and respond to Jesmany Jomarron email re: authority .1; review and respond to Corey Tickner re: body shop .1; review and respond to Ken Murena re: civil remedy letter .1; review and respond to Kristen Gurruchari and others re: trees .1; review and respond to Melanie Damian re: Carlos Villalobos notice .1; review Royal Palm request .1; email to Corey ticker er: Royal Palm .1; review and respond to Alyson Theale re: new manager .1; review and respond to Ken Murena re: complaint .1	DMG2	1.40
09/28/23	Telephone conference with Melissa Vazquez (First Service Residential) regarding Power of Attorney needed b Ms. Vazquez to finalize sale of vehicles to CarMax	ERT	0.10
09/28/23	Telephone conference with Advisory Board counsel (Jesman Jomarron, Esq.) regarding steps going forward following yesterday's Finance Committee meeting	ERT	0.30
09/29/23	Review and respond to Alyson Theale email re: new manager .1;	DMG2	1.20

review and respond to Jesmany Jomarron email re: complaint .1; review and respond to Corey Tickner email containing plan re: fining committee .1; review and respond to Eric Thompson and Tony China email re: ACC .1; review and respond to Adriana Pavon email re: sale of cars .1; review and respond to Corey Tickner email re: Royal Palm .1; review and respond to multiple emails re: budget and questions related to budget .2; review and respond to Jesmany Jomarron email with plan re: ownership issues .2; review billing invoices from Avid system for payment approval .2

09/29/23	Email correspondence with Corey Tickner (FirstService Residential) regarding status of his communications with homeowners for whom Determination Forms on Architectural Control Applications were recently executed	ERT	0.10
09/29/23	Email correspondence with D. Gersten and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding homeowners' questions regarding particular items in the Association's budget following 9/27/23 Finance Committee meeting	ERT	0.10
09/29/23	Email correspondence with D. Gersten, independent counsel (Melanie Damian, Esq.) and Advisory Board counsel (Jesmany Jomarron, Esq.) regarding strategy as to potential hazard from trees on Kendall Drive (as reported by Advisory Board member Kristen Gurucharri)	ERT	0.20
09/30/23	Conference with CPA re: budget issues .2	DMG2	0.20

### Services Recap

<u>Init</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DMG2	David Gersten	Partner	665.00	43.40	28,861.00
ERT	Eric Thompson	Partner	380.00	40.10	15,238.00
LML3	Leonor Lagomasino	Partner	380.00	23.00	8,740.00

TOTAL FOR SERVICES	\$55,620.00
LESS DISCOUNT	-2,781.00
TOTAL FEES	\$52,839.00

## Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/13/23	Messenger Service - VENDOR: Federal Express Corporation INVOICE#: 8-263-27240 DATE: 9/22/2023 FedEx service for 826327240,783707337781,Delivery service fees of 73.30 to David Gersten, 14804 SE NORTHSHORE CIR/VANCOUVER WA 98683 re: 13769/matter id 1292668	73.30
	TOTAL EXPENSES	\$73.30

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## Outstanding Statements as of October 12, 2023

<u>Invoice Number</u>	<u>Date</u>	<u>Balance Due</u>
Statement No 21387877	August 18, 2023	\$63,187.64
Statement No 21415052	September 28, 2023	\$72,245.02
<b>Total Accounts Receivable Balance:</b>		<b>\$135,432.66</b>

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# GRSM50

GORDON REES SCULLY MANSUKHANI

YOUR 50 STATE LAW FIRM™

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

October 12, 2023  
ID: GERSP 1292668  
Invoice No. 21424055  
Gersten, David M.

RE: Danton v. Hammocks Community Association

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## BILLING SUMMARY THROUGH September 30, 2023

Fees For Professional Services:	\$55,620.00
LESS DISCOUNT	-2,781.00
Total for Professional Services:	52,839.00
Expenses and Advances:	<u>73.30</u>
<b>Current Bill:</b>	<b>\$52,912.30</b>

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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: 21424055

**REMITTANCE COPY**  
PLEASE INCLUDE THIS PAGE WITH YOUR PAYMENT

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

## Invoice

Invoice Date: 9/30/2023  
 Invoice No: 23535  
 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
07/01/2023	Review and analyze emails regarding ACC applications (0.1); review and analyze ACC panel chart (0.2).	RML	\$525.00	0.30	\$157.50
07/02/2023	Call with Receiver regarding litigation strategy, settlement negotiations, and playground equipment.	RML	\$525.00	0.40	\$210.00
07/03/2023	Email exchange regarding ACC meeting (0.1); draft emails regarding ACC panel matters (0.2); email exchange regarding playground equipment negotiations (0.2).	RML	\$525.00	0.50	\$262.50
07/03/2023	Cepero - Review and analyze Marglli Gallego's Motion To Dismiss Complaint.	RML	\$525.00	0.10	\$52.50
07/03/2023	Reviewing and approving certain operational invoices in AVID.	MME	\$550.00	0.30	\$165.00
07/03/2023	Emails with E. Thompson and Receiver regarding the Court's denial of the Ceperos's Motion to transfer third appeal to the District Judge presiding over first two appeals and strategize regarding filing new Motion seeking transfer to second appeal or seeking stay of briefing in third appeal and need for additional time to prepare Answer Brief in third appeal.	KDM	\$525.00	0.20	\$105.00
07/05/2023	Review of Alfaro & Fernandez discovery to obtain evidence of missing funds (.5); prepare e-mail to Alfaro & Fernandez regarding N. Arriaga (0.1).	AP	\$325.00	0.60	\$195.00
07/05/2023	Email exchanges with adjuster Dee Studler regarding crime policy and additional information requested (.1); email exchange with Capital One regarding outstanding subpoena (.1); Email exchange with Banco Popular regarding outstanding subpoena and password needed (.1).	AP	\$325.00	0.30	\$97.50

07/05/2023	Email exchanges with Popular Bank to obtain password for production in response to subpoena and review of document response (.2); prepare chart of quotes for vehicle sales from three dealerships (.7); telephone call with Carmax (.2); telephone call with Auto Nation (.3); email exchange with M. Vazquez regarding status of multiple matters (.1); review of subpoena responses from Banco Popular years 2019-2020 (.4); email exchange with S. Banez to provide missing bank statements (.1)	AP	\$325.00	2.00	\$650.00
07/05/2023	Email exchanges with K. Veilleux to obtain additional information on return of deposit and review of documents (.2); email exchange with K. Murena to obtain instruction on deposit for K. Veilleux (.1).	AP	\$325.00	0.30	\$97.50
07/05/2023	Work on strategy related to unreceived payments from Alfaro & Fernandez (0.1); email exchange with counsel for Leaf (0.1); work on negotiating and strategy for equipment financing (0.3); email exchange regarding ACC meeting (0.2); review and analyze clubhouse rental agreement (0.2).	RML	\$525.00	0.90	\$472.50
07/05/2023	Alfaro & Fernandez - Call with opposing counsel regarding settlement.	RML	\$525.00	0.10	\$52.50
07/05/2023	(No charge) Cepero - Work on hearing on motion to dismiss.	RML		0.10	\$0.00
07/05/2023	Attend deposition of Excellent Work records custodian (no show).	CP	\$275.00	0.60	\$165.00
07/05/2023	Telephone call with AUSA regarding PPP loans, e-mail with bank regarding same, e-mail with accountant regarding same and e-mail Receiver (1.0); reviewing cash report and responding to FSR (.3); e-mails regarding Turf management status of work and invoices (.2); reviewing and executing ATT contract (.4).	MME	\$550.00	1.90	\$1,045.00

07/05/2023	<p>Emails with Santander Bank regarding production in response to Subpoena and emails with A. Pavon regarding same and the status of productions from other Banks to which Subpoenas were sent (.2); review letter from Banco Popular providing production in response to Subpoena and invoice for same, coordinate payment of invoice and downloading of production, discuss with A. Pavon, and coordinate sending for forensic account (.2); emails with forensic accountant regarding same and review portions of production (.3); review Affidavit of Service on CIT Bank for third Subpoena, coordinate following up on timing of production and the status of service on other banks, and receive update regarding same (.2); review updated Notice of Hearing/Status Conference in Bankruptcy Court to address District Court's reversal and remand of ruling, emails with M. Damian regarding same, and confirm registration for Zoom appearance (.2); discuss with M. Damian the status negotiations with counsel for crime insurance policy carrier and exchange further emails with counsel regarding same (.2); discuss with A. Pavon following up with crime insurance carrier's accountant investigator regarding our last correspondence summarizing all evidence provided in support of Proof of Loss and provide further input regarding same and scheduling call to discuss (.2); emails with accountant and A. Pavon regarding same (.1); emails with E. Thompson and Receiver regarding draft Motion to transfer case or for extension of deadline to file Answer Brief in third Ceperos appeal, review and approve same, and review emails with counsel for the Ceperos regarding their approval of same (.3); work on downloading production from Capital One's secure portal, emails with A. Pavon regarding same, coordinate contacting Bank to resolve issue, and review emails with Bank regarding same (.3); discuss with A. Pavon the status of selling the remaining cars of the Association not being used and communications with CarMax and AutoNation regarding same, and provide input regarding same (.2); emails with A. Pavon regarding another homeowner requesting return of fee and security deposit paid for rental of space for event that never took place, review emails and documents provided by homeowner supporting his request, and coordinate having funds returned to homeowner (.2).</p>	KDM	\$525.00	2.60	\$1,365.00
07/06/2023	<p>Email exchange with M. Vazquez providing reimbursement authority (.1); Email exchange with Melissa Vazquez regarding updates on ledger issue (.1); Email exchanges with Barbara Santovenia regarding sale of vehicles (.2); follow-up email exchange with Judge Gersten regarding reimbursement to home owner (.1); obtain status update on subpoena to CIT Bank and Truist (.2).</p>	AP	\$325.00	0.70	\$227.50

07/06/2023	Call with Property Manager regarding clubhouse rental legal and security issues (0.2); draft email to S. Demos regarding Nelly Arriago check to Alfaro & Fernandez and review and analyze related documents (0.3); call from attorney Shannon Zetrouer (0.2); work on claims strategy (0.2); work on recovery of funds from Sport Surfaces (0.1); confer with playground and fitness equipment manufacturer regarding resolution (0.2) call with Brenda Grant, General Counsel of Gametime regarding resolution of matter (0.2).	RML	\$525.00	1.40	\$735.00
07/06/2023	Review of documents from Capital One regarding stolen vehicle (.5); telephone with H Greg regarding stolen vehicle (.1); prepare summary of findings in subpoena responses from Capital One (.1); email exchanges with Capital One regarding overdue subpoena responses (.2); email exchanges with Kubicki Draper to obtain status on Rodriguez v Hammocks and Guzman v Hammocks matters (.2); email exchange with adjuster Dennis Broderick to obtain status on Paul and Vivian Glazer claim (.1); email exchanges with Richard Kenney to obtain status update on Maria Lujan matter (.1).	AP	\$325.00	1.30	\$422.50
07/06/2023	Cepero - Email exchange with opposing counsel regarding hearing on motion to dismiss.	RML	\$525.00	0.10	\$52.50
07/06/2023	Telephone call with Auto Nation (.3); email exchange with K. Murena to obtain direction on selling vehicles to Auto Nation (.1); prepare status report on vehicle sales (.2).	AP	\$325.00	0.60	\$195.00
07/06/2023	Hermida - Call from Jose Quinion (0.1); email exchange with J. Quinion (0.1).	RML	\$525.00	0.20	\$105.00
07/06/2023	Prepare subpoena to H. Gregory 1, Inc. regarding vehicle sale.	AP	\$325.00	0.80	\$260.00
07/06/2023	Reviewing and approving operational expenses in AVID and emails regarding same.	MME	\$550.00	0.40	\$220.00

07/06/2023	Further emails with A. Pavon regarding homeowners' requests for return of fees and security deposits for rental of spaces for event that never took place and provide further input regarding same (.1); discuss with M. Damian the status of insurance carrier's counsel's consideration of our letter responding to their reservation of rights letter for purposes of crime policy claim (.1); telephone call from counsel for the Ceperos regarding other homeowner's request for information from property manager and access to park and discuss with team members same (.2); emails with A. Pavon and adjusters for personal injury claims filed against Association regarding documents and information requested and related matters (.2); email with A. Pavon and insurance counsel for the Association regarding status of execution of Release for purposes of settlement with Estate that filed wrongful death action against Association (.1); email with A. Pavon and insurance counsel regarding the status of a personal injury claim against the Association and discuss with team members (.1); email from A. Pavon providing update regarding the efforts to sell the vehicles and new offers from AutoNation and CarMax and the need for a power of attorney from Receiver, provide input regarding same, and review and approve email to Receiver providing summary of same (.2); email from A. Pavon providing update regarding investigation of pre-receivership sale of one vehicle and review documents from auction company that sold vehicle regarding same and provide direction regarding further investigation and sending Subpoena to auction company (.2); email from A. Pavon regarding production from Capital One in response to Subpoena and review same (.3); email and letter from accountant for crime insurance carrier regarding the status of their investigation of proof of loss and supporting documentation provided and discuss with team members (.2).	KDM	\$525.00	1.70	\$892.50
07/07/2023	Email exchange with adjuster R. Kenney regarding update on Maria Lujan matter (.1); email exchange with Judge Gersten to provide release of claims in wrongful death matter (.1); email exchange with Judge Gersten providing vehicle status update (.1); email exchange with Jesmany Jomarron regarding update from Alfaro & Fernandez (.1); revise subpoena to Truist Bank (.2); email exchange providing update on N. Arriaga investigation to Jesmany, Judge Gersten, and M. Vazquez (.1); email exchanges with M. Vazquez and M. Barad in reference to ticket 715781 and Veritex Bank account (.2); email exchange with C. Myburgh regarding update on ledger discrepancy and review of multiple payment confirmations provided (.2).	AP	\$325.00	1.10	\$357.50
07/07/2023	Revise subpoena to H. Gregory 1, Inc. regarding vehicle sale.	AP	\$325.00	0.30	\$97.50
07/07/2023	Review and analyze email from S. Demos regarding Alfaro & Fernandez trust account and review and analyze underlying information.	RML	\$525.00	0.20	\$105.00
07/07/2023	Rasco - Review and analyze documents provided by Rasco Klock.	RML	\$525.00	0.50	\$262.50

07/07/2023	Review documents provided by additional collections counsel (.3); assess several court filings (.1).	CP	\$275.00	0.40	\$110.00
07/07/2023	Review and analyze email from Property Manager regarding fence repairs and draft email to Receiver regarding same (0.1); review and analyze letter from Shannon L. Zetrouer, draft email response, and draft email to Eric Thompson regarding same (0.1),	RML	\$525.00	0.20	\$105.00
07/07/2023	Emails with insurance counsel for Association regarding executed Release for purposes of settlement of wrongful death claim, review same, and emails with A. Pavon and Receiver regarding same (.2); emails with insurance counsel for Association and A. Pavon regarding the status of personal injury action against Association (.1); emails with adjuster for another personal injury claim against Association regarding status of investigation and whether additional documents or information in necessary (.1); emails with Receiver and A. Pavon regarding the status of the vehicle sales, the proposed plan for selling the remaining vehicles not needed by Association, approving power of attorney for sale, and related matters, and provide further input to A. Pavon regarding same (.2); review and revise Subpoena to auction company that sold vehicle of Association pre-receivership and emails with A. Pavon regarding same (.2); emails with team members regarding service of Supplemental Subpoena to Truist Bank and review same (.1); review Order granting Motion to transfer third Cepero appeal to the second appeal and discuss with team members (.1); emails with E. Thompson and Receiver regarding same and preparation of Motion to stay briefing pending Bankruptcy Court's amending her orders pursuant to reversal and remand (.1); emails with A. Pavon regarding the limited power of attorney for purposes of the sale of the remaining unnecessary vehicles to AutoNation or CarMax, review and revise same, and coordinate finalizing and having Receiver review and executed (.2).	KDM	\$525.00	1.30	\$682.50
07/09/2023	(No charge) Reviewing invoices for attorneys fees.	MME		1.00	\$0.00
07/09/2023	Review and analyze documents provided by Regions Bank.	RML	\$525.00	0.30	\$157.50
07/10/2023	Email exchange with Judge Gersten regarding power of attorney (.1); finalize power of attorney (.1); email exchange with M. Vazquez regarding dispute with homeowner over fence in Wild Park (.1); email exchange with E. Thompson regarding 10544 SW (.1).	AP	\$325.00	0.40	\$130.00
07/10/2023	Telephone call with C. Tickner to discuss Wild Park fence (.1); perform property public search of Folio No. 30-5909-019-0020 (.3); email exchanges with A. Leon to discuss fence issue (.2); receipt and review of documents provided by A. Leon regarding violations against association (.1); telephone calls with A. Leon regarding access to common property (.3); email with C. Tickner providing direction on Wild Park access to lake (.1).	AP	\$325.00	1.10	\$357.50

07/10/2023	Email exchange with R. Mola regarding update on Rodriguez v Hammocks matter (.1); email exchanges with D. Broderick to provide missing information in Glazer claim (.2)	AP	\$325.00	0.30	\$97.50
07/10/2023	Email exchange with Gametime regarding playgrounds and fitness equipment matter (0.1); call with Clint Whiteside regarding playgrounds and fitness equipment matter (0.4).	RML	\$525.00	0.50	\$262.50
07/10/2023	Cepero - Review and analyze motion for relief from stay.	RML	\$525.00	0.10	\$52.50
07/10/2023	Rasco Klock - Review and analyze Rasco Klock's opposition to motion to transfer case to Division 22 (0.3); review and analyze Rasco Klock's motion to dismiss (0.2); review and analyze Napoleon's opposition to motion to transfer case to Division 22 (0.1); review and analyze Napoleon's motion to dismiss (0.2).	RML	\$525.00	0.80	\$420.00
07/10/2023	Reviewing towing contract and e-mail Regarding same (.2); e-mail regarding AC meeting issues (.2).	MME	\$550.00	0.40	\$220.00



07/10/2023	<p>Discuss with A. Pavon the status of various matters including vehicle sales, insurance claims for missing/stolen vehicles, request of insurance adjuster for purposes of personal injury claims against Association, and other matters, and provide input regarding same (.2); review further emails with Receiver regarding the power of attorney to be signed for purposes of sale of remaining vehicles not needed by Association (.1); emails with counsel for the Ceperos regarding request of another homeowner to access public park and parking lot within the Hammocks and providing information and pictures regarding same, review same, exchange emails with A. Pavon regarding same, and coordinate investigation and resolution of issue (.2); review Order transferring third Ceperos appeal to Judge Scola, emails with E. Thompson and Receiver regarding same and draft Motion to stay briefing schedule, and review and propose revisions to Motion, and emails with counsel for Ceperos's regarding approval of same (.4); review the Ceperos's Motion to Lift Stay in Appointment Order to proceed with litigation, discuss with team members, and exchange emails with E. Thompson regarding same and preparation of response (.3); email from Receiver's office regarding new personal injury lawsuit filed against the Association, review Complaint, discuss with M. Damian and A. Pavon, and send emails to insurance adjuster providing notice and forwarding copy of Complaint and requesting direction regarding same (.4); review Notice of Transmittal of Record on Appeal in third Ceperos appeal and Notice from the Court setting briefing deadlines and emails with team members regarding same, the filing of Appellant's Initial Brief and the deadline to file Answer Brief for which extension was sought (.2); review Order granting extension of time to file Answer Brief and discuss with team members (.1); emails with insurance counsel for Association and A. Pavon regarding the status of discovery in personal injury lawsuit against Association and related matters and discuss with A. Pavon (.2); emails with adjuster and A. Pavon regarding documents, information, and pictures related to personal injury claim (.1); emails with team members regarding serving Plaintiff's counsel and Receiver with subpoena to auction company that sold Association vehicle and review service email (.1); email from M. Damian and Receiver regarding Agreement for towing service for the Association and preparation of letter cancelling Agreement, review same, and send email to A. Pavon regarding same (.2).</p>	KDM	\$525.00	2.50	\$1,312.50
07/11/2023	<p>Rasco - Work on strategy for response to motions to dismiss (0.1); work on preparation for motion to transfer to Division 22 (0.3).</p>	RML	\$525.00	0.40	\$210.00
07/11/2023	<p>Call from ATT regarding internet service matter (0.1); call with Eric Thompson regarding litigation status and strategy (0.2); call with Dan Wen regarding workout of playground loan (0.2); review and analyze email from Navitas and draft response (0.1).</p>	RML	\$525.00	0.60	\$315.00

07/11/2023	Email exchange with E. Thompson regarding power of attorney (.2); email exchange with M. Vazquez regarding direction to sale vehicles and coordination of same (.1); telephone calls with Auto Nation representative (.3); review of law suit filed by Maria Lujan (.3).	AP	\$325.00	0.90	\$292.50
07/11/2023	Draft termination of service agreement with Prestige Towing Letter.	AP	\$325.00	0.70	\$227.50
07/11/2023	Email exchange with E. Thompson regarding fence update (.1); email exchange with Detective Polo providing summary of received information related to police report (.2)	AP	\$325.00	0.30	\$97.50
07/11/2023	Receipt and review Motions to dismiss by Rasco Klock and Hilton Napoleon (.6); and discuss same with co-counsel (.3) reviewing cash report and approving invoices in ADVID (.6).	MME	\$550.00	1.50	\$825.00
07/11/2023	Preliminary review of complaint against Klock and Napoleon law firms and motions to dismiss complaint filed by both defendants.	RKL	\$525.00	0.80	\$420.00
07/12/2023	Email exchange with prestige towing regarding service agreement cancellation (.1); email exchanges and telephone call with D. Baptista regarding dispute with hammocks association (.2).	AP	\$325.00	0.30	\$97.50
07/12/2023	Rasco - Prepare for hearing on motion to transfer (0.4); attend hearing on motion to transfer (0.9).	RML	\$525.00	1.30	\$682.50
07/12/2023	Email exchange with E. Tamayo.	RML	\$525.00	0.10	\$52.50
07/12/2023	Briefing regarding standing, reviewing case law and e-mails with co-counsel regarding same (.7); telephone update with Receiver (.4).	MME	\$550.00	1.10	\$605.00
07/12/2023	Emails with E. Thompson and forensic accountant regarding summary of work done during reporting period for purposes of Receiver's Quarterly Status Report and review summary (.1); exchange emails with E. Thompson regarding the status of claim against D&O insurance carrier for purposes of Status Report, exchange emails with T. Culmo regarding same, and send email to E. Thompson regarding the status (.2); email from Popular Bank providing supplemental production in response to third Subpoena, review same, and emails with A. Pavon regarding same (.2); emails with E. Thompson regarding confirming the balances in the Associations' various accounts and the balance of the loan from Popular Bank and work on confirming same (.3); receive confirmation of service of Subpoena on auction company and discuss with team members (.1).	KDM	\$525.00	0.90	\$472.50
07/12/2023	Further analysis of motions to dismiss filed by both defendants to identify chief arguments made and cases cited by defendants (.8); review and analysis of defendants' pleading standards cases and additional research of Florida law on same (1.1); analyze Defendants' cases on stating legal malpractice claim in Florida and additional independent research on same (1.2).	RKL	\$525.00	3.10	\$1,627.50

07/13/2023	Email exchange with M. Vazquez regarding update on refunds and sale of vehicles (.2); email exchange with J. Cuerva regarding status of reimbursement (.1); telephone calls and communications with AutoNation to coordinate sale of vehicles and provide photos, mileage, and corporate information (.6); email exchange with K. Murena summarizing findings of alleged illegal fence in the hammocks (.3).	AP	\$325.00	1.20	\$390.00
07/13/2023	Email exchange with Detective Tamayo regarding vehicles purchased in 2022 by the Association (.1); review of documents provided by Chief Tamayo and comparison of vehicle sheet to determine if vehicles are properly accounted for (.2).	AP	\$325.00	0.30	\$97.50
07/13/2023	Call with M. Ernst regarding documents and witness matters (0.5); email exchange with Receiver regarding ACC applications (0.1); draft email regarding ACC panel procedures (0.2).	RML	\$525.00	0.80	\$420.00
07/13/2023	Preparing for hearing on Motion to Dismiss D & O case (2.3); attend hearing on Motion to Dismiss (.4); telephone update with Receiver regarding contract review meeting and hearing (.3).	MME	\$550.00	3.00	\$1,650.00
07/13/2023	Continue working on confirming balances in the Association's various accounts including loan account with Popular Bank, exchange emails with M. Dhanji and FSR regarding balances in current operating accounts, and send email to E. Thompson and Receiver providing balances (.7); emails with M. Dhanji and FSR regarding the next loan payment amount and deadline and need for transfer from operating account in addition to transfer from Popular Bank checking account to cover payment (.2); emails with E. Thompson regarding the draft Status Report and begin reviewing same (.4); review A. Pavon's summary of investigation of issue raised by homeowner related to access to a park and parking lot, emails with A. Pavon regarding same, and provide direction regarding communicating same to homeowner (.2); email from First Citizens Bank providing production in response to Subpoena, download and review production, send to A. Pavon, and coordinate sending to forensic accountant (.3); review Notice from Court regarding hearing on Ceperos's Motion to lift litigation stay in Receivership Order and discuss with team members attendance at same (.1).	KDM	\$525.00	1.90	\$997.50
07/13/2023	Further research on cases dismissing complaints for legal malpractice under Florida law (.5); review memo and cases cited on Receiver authority to sue for fraudulent transfer under Florida law (.5); Begin drafting response to motions to dismiss (2.5).	RKL	\$525.00	3.50	\$1,837.50
07/14/2023	Work on analysis of subpoenaed documents (0.2); review and revise subpoena to Santiago Legal, PLLC and Yadel Santiago (0.2).	RML	\$525.00	0.40	\$210.00

07/14/2023	Review Order denying D&Os Motion to Dismiss Complaint and setting answer deadline, discuss with team members, and send email to E. Thompson regarding same (.2); emails with Ally Bank regarding the cancellation of the sales to Carvana and the Bank's propose motion to repossess the vehicles to sell them and the Receiver's position on same, and emails with A. Pavon regarding same and the status of proposed sales to AutoNation or CarMax (.2); receive and review affidavit of service of Subpoena on third party and discuss with team members same and response deadline (.1).	KDM	\$525.00	0.50	\$262.50
07/14/2023	Correspondence with G. Galceran regarding status of Receiver's position on seized car.	CP	\$275.00	0.20	\$55.00
07/14/2023	Continue drafting response to motions to dismiss.	RKL	\$525.00	2.40	\$1,260.00
07/16/2023	Reviewing and revising 4th status report (.8); e-mail with Receiver regarding homeowner communication (.3).	MME	\$550.00	1.10	\$605.00
07/16/2023	Review and revise portions of report relating to litigation.	RML	\$525.00	0.20	\$105.00
07/16/2023	Alfaro - Review and analyze motion to dismiss complaint.	RML	\$525.00	0.20	\$105.00
07/16/2023	Emails with M. Damian and A. Pavon regarding the status of the insurance claims and obtaining new titles for the missing cars (.2); review M. Damian's revisions to the Receiver's latest Status Report, make further revisions to same, and send revised version to E. Thompson to finalize (1.8); email from R. Landy forwarding further revisions to the Status Report and review same (.2); email from Receiver regarding the revisions to the Report and the status of the insurance claims for the stolen vehicles (.1).	KDM	\$525.00	2.30	\$1,207.50
07/17/2023	Telephone calls with underwriting team of Auto Nation and Auto Nation Representative (.4); email exchanges providing additional information requested from Auto Nation to proceed with same-day sale (.3); telephone calls with M. Vazquez to discuss sale-day sale (.3).	AP	\$325.00	1.00	\$325.00
07/17/2023	Review and analyze certain association documents.	RML	\$525.00	0.20	\$105.00
07/17/2023	Attend discovery tutorial regarding searching Hammocks data base.	CP	\$275.00	0.40	\$110.00
07/17/2023	Emails and call with Receiver regarding homeowner communication and playground contract.	MME	\$550.00	0.70	\$385.00
07/17/2023	Call with T. Ward regarding resolution of dispute (0.4); calls with Receiver regarding motion (0.7).	RML	\$525.00	1.10	\$577.50
07/17/2023	Cepero - Review and analyze emails from counsel related to motions to dismiss.	RML	\$525.00	0.10	\$52.50
07/17/2023	Finish drafting, reviewing, and editing response to motions to dismiss.	RKL	\$525.00	2.30	\$1,207.50

07/17/2023	Emails with E. Thompson and M. Damian regarding further revisions to the Receiver's 6th Status Report and provide further input regarding same (.2); email from E. Thompson forwarding final revisions to the Receiver's 6th Status Report and review same (.3); further emails with M. Damian and E. Thompson regarding invoices being included in Final Report and Fee Application and review final version of Report filed with the Court (.1); emails with team members regarding deadline to pay insurance premium for certain policies and confirm payment is scheduled (.1); emails with R. Landy regarding emails with homeowners regarding Popular Bank's sending link to portal to pay assessments, review email, and send email to Popular Bank representative requesting investigation of same (.2); emails with insurance broker and A. Pavon regarding removing certain vehicles from the insurance policy, adding back in other vehicles, and the change in premiums and endorsements related to same, review endorsements and related documents, and coordinate confirming premiums (.2).	KDM	\$525.00	1.10	\$577.50
07/18/2023	Email exchange with A. Leon regarding concerns regarding lake access and resolution of same.	AP	\$325.00	0.40	\$130.00
07/18/2023	Telephone call with A. Leon regarding common area access point and violations.	AP	\$325.00	0.40	\$130.00
07/18/2023	Alfaro - Work on litigation strategy and draft email to opposing counsel.	RML	\$525.00	0.20	\$105.00
07/18/2023	Rasco Klock - Work on planning for joint case management report and draft emails to opposing counsel regarding same.	RML	\$525.00	0.30	\$157.50
07/18/2023	Work on resolution of motions for attorneys' fees and costs pending against the Association (0.6); email exchange with Ms. Ginarte regarding ACC application and draft email to Property Manager regarding same (0.2); call from Receiver regarding crime policy (0.2).	RML	\$525.00	1.00	\$525.00
07/18/2023	Jauregui - Work on litigation strategy and draft email to counsel.	RML	\$525.00	0.10	\$52.50
07/18/2023	Email exchange with M. Vazquez to discuss missing payments of Ms. Ham.	AP	\$325.00	0.20	\$65.00
07/18/2023	Call with Chase subpoena services regarding compliance with document request (.1); assess status of several subpoenas (.2); conduct Disco search regarding R. Pardo representation of K. Alzate (1.8).	CP	\$275.00	2.10	\$577.50
07/18/2023	Review and analyze email from Receiver regarding ACC application, review and analyze homeowner questions, and draft email to Property Manager regarding same.	RML	\$525.00	0.10	\$52.50
07/18/2023	Hermida - Draft email to defendants regarding meet and confer on motion to transfer.	RML	\$525.00	0.10	\$52.50

07/18/2023	Emails with Receiver and E. Thompson regarding the upcoming Status Conference in the Ceperos's bankruptcy case on the District Court's Opinion and Order and prepare for Status Conference (1.3); emails with M. Dhanji regarding letter and statement from Truist Bank showing fees assessed to account and requesting payment of negative balance of closed account, review same, and send email to the Bank requesting reversal of fees and following up on prior request (.2); review the Ceperos's Amended Initial Brief in their appeal of Bankruptcy Court's order denying attorneys' fees and strategize regarding same (.6); review Order granting stay relief to MidFirst Bank to proceed with foreclosure action (.1); review recent court filings in one bankruptcy case of homeowner and emails with team members regarding same and monitor this and other bankruptcy cases of homeowners (.1).	KDM	\$525.00	2.30	\$1,207.50
07/19/2023	Email exchange with Auto Nation regarding sale of vehicles (.1); email exchange with Judge Gersten providing Veritex Community Bank Update (.1); email exchange with M. Vazquez attaching multiple documents to forward to contact (.1)	AP	\$325.00	0.30	\$97.50
07/19/2023	Telephone calls with M. Vazquez regarding Regions Bank and PO Box (.3); telephone call with USPS to identify PO Box homeowners have been mailing payments to (.3); perform public records search on PO Box and individual named (.2); perform search on M. Campos to determine ledger discrepancies (.2).	AP	\$325.00	1.00	\$325.00
07/19/2023	Prepare subpoena to United States Postal Office	AP	\$325.00	0.50	\$162.50
07/19/2023	Responding to homeowner complaint (.2); reviewing cashflow and approving operational invoices in AVID (.5); revising response to Motion to dismiss professional claim and e-mail with Receiver and co-counsel (1.0)	MME	\$550.00	1.70	\$935.00
07/19/2023	Review and analyze email from homeowner regarding ACC application and draft response.	RML	\$525.00	0.10	\$52.50
07/19/2023	Rasco - Work on joint case management report planning and strategy.	RML	\$525.00	0.20	\$105.00
07/19/2023	Work on discovery related to Sport Surfaces (0.1); work on resolution of fitness equipment (0.1).	RML	\$525.00	0.20	\$105.00
07/19/2023	Jauragui - Review and analyze email from opposing counsel and draft response regarding response to complaint and settlement and draft email to Receiver regarding same (0.2); email exchange with opposing counsel regarding same (0.2).	RML	\$525.00	0.40	\$210.00

07/19/2023	Further emails with Receiver regarding upcoming Status Conference in the Ceperos Bankruptcy case regarding the District Court's Opinion and Order remanding case and the pending Motion for Reconsideration and finish preparing for same (.2); attend Status Conference regarding same and discuss with C. Perez the Bankruptcy Court's request for update after the Court rules on Motion for Reconsideration and whether the Ceperos appeal that ruling to 11th Circuit (.3); emails with E. Thompson and Receiver regarding the outcome of the hearing and strategy for the District Court appeals, whether Bankruptcy Court will enter order, and preparing and filing Notice to the District Court, and further discuss with C. Perez (.4); emails with FSR regarding information from RevoPay (.1); emails with A. Pavon and FSR regarding check from homeowner to Association deposited in Regions Bank account and investigating that deposit (.1); email from A. Pavon regarding investigation of deposits by homeowners to account at Veritext Community Bank and the status receiving response to Subpoena to that bank and email from Receiver regarding same (.1); email from A. Pavon regarding the status of investigation of various homeowners' payments sent to a PO Box and the depositing of those checks in non-Association account and provide direction regarding filing report with USPS and sending Subpoena for records regarding PO Box (.2); emails with R. Landy and the Receiver regarding the crime insurance claim and related matters and coordinate following up with counsel for insurance carrier regarding analysis of our response and materials in support of Receiver's claim (.2); emails with Popular Bank regarding cancelling all services through which homeowners previously made payments and ceasing all correspondence from the bank to homeowners and emails with FSR regarding same and the lockbox address used by homeowners (.2); review production from Santander in response to Subpoena and coordinate sending to forensic accountant (.2); emails with attorney for crime insurance carrier evaluating response to reservation of rights letter and materials submitted in support of proof of loss and further discuss with team members (.2); review the latest statement of the premium payment for two insurance policies and send to FSR and M. Dhanji to arrange for payment (.1).	KDM	\$525.00	2.30	\$1,207.50
07/20/2023	Meeting with co-counsel and Receiver regarding advisory board and town hall and various operational issues.	MME	\$550.00	1.10	\$605.00
07/20/2023	Edit and finalize subpoena to USPS regarding PO Box for missing payments.	AP	\$325.00	1.30	\$422.50
07/20/2023	Prepare indepth identity theft report to USPS	AP	\$325.00	0.80	\$260.00
07/20/2023	Email exchange with Auto Nation to obtain status on car sale (.1); email exchange with Prestige Towing to follow-up on cancellation of hearing (.1).	AP	\$325.00	0.20	\$65.00

07/20/2023	Emails with process server and L. Diaz regarding service of supplemental Subpoena on Truist Bank (.1); review and approve Subpoena to USPS regarding PO Box to which homeowners sent payments and coordinate service (.2); emails with M. Damian regarding following up with attorney for crime insurance carrier regarding status of his evaluating our response to reservation of rights letter and materials submitted in support of proof of loss (.1); review emails with towing company and A. Pavon regarding the status of cancellation of contract with Association (.1); review District Court's Order denying the Ceperos's Motion for Reconsideration of Opinion and Order and the Judgment, discuss with C. Perez, and strategize regarding effect of same on proceedings in Bankruptcy Court (.4); emails with E. Thompson and Receiver regarding same, effect of the Order and Judgment, amount for which Association may be liable thereunder, further issues to analyze, and scheduling call to discuss, and strategize regarding same (.4).	KDM	\$525.00	1.30	\$682.50
07/21/2023	Email updates on affirmative claims.	MME	\$550.00	0.40	\$220.00
07/21/2023	Danton - Call with Axiom Resources regarding release from L. Dorado estoppel (.2); correspondence with B. Stringer, Axiom Resources regarding estoppel (.2).	CP	\$275.00	0.40	\$110.00
07/21/2023	Receipt and analysis of Santander's responses to subpoena (.4); email exchange with M. Vazquez regarding stolen vehicles (.1); email exchanges with Veritex to obtain status on overdue subpoena (Hammocks) (.2); email exchange with USPS regarding identity the ft claim (.1).	AP	\$325.00	0.80	\$260.00
07/21/2023	Telephone calls with M. Vazquez to discuss auto nation update, ledger update, USPS update, and PO Box issue (.5); emails with M. Vazquez regarding deductible bills to Association for various claims (.1); review of documents related to S. Vazquez claim (.2)	AP	\$325.00	0.80	\$260.00
07/21/2023	Review and analyze cases cited in Alfaro & Fernandez motion to dismiss (.8); additional research on cases addressing whether Florida Rule of Civil Procedure 1.110(f) prohibits allegations against multiple defendants without delineating the specific conduct of each defendant (.8); discuss results with Melanie Damian (.1).	RKL	\$525.00	1.70	\$892.50



07/21/2023	Further emails with E. Thompson and Receiver regarding scheduling call to discuss the District Court's Order denying the Ceperos's Motion for Reconsideration of Opinion and Order and Judgment and effect of same on ultimate damages order of Bankruptcy Court, review certain underlying Bankruptcy Court Orders, and prepare and send to Receiver and E. Thompson analysis of same and the Order denying Motion for Reconsideration (.8); emails with A. Pavon regarding general liability insurance carrier's request for payment of deductible for unknown claim, review emails with FSR and insurance agent regarding same, and coordinate requesting additional information from carrier (.2); emails with FSR regarding additional records needed from RevoPay and scheduling call to discuss same and discuss with team members (.2); emails with Truist Bank regarding extension of time to respond to supplemental subpoena and estimate for the cost of the production, review same, and exchange emails with team members regarding same (.2); emails with FSR regarding bill pay service provided by Popular Bank and investigation of same and review records related to same (.2).	KDM	\$525.00	1.60	\$840.00
07/21/2023	Emails from attorney Edwin Cruz regarding extension of time to respond to demand and request for documentary support.	TAC	\$525.00	0.20	\$105.00
07/22/2023	Rasco - Review and analyze email from opposing counsel regarding reply to motion to dismiss and draft response.	RML	\$525.00	0.10	\$52.50
07/22/2023	Review and analyze email from Leaf regarding settlement of equipment matter and draft email to Receiver regarding same.	RML	\$525.00	0.20	\$105.00
07/22/2023	Alfaro - Review and analyze research regarding pleading and response to motion to dismiss and work on related litigation strategy.	RML	\$525.00	0.20	\$105.00
07/23/2023	Review and revise subpoena to Sports Surfaces (0.2); review and revise facility rental agreement and draft email to J. Jomarron regarding same (0.3).	RML	\$525.00	0.50	\$262.50
07/24/2023	Review and analyze proposed Navitas contract (0.2); call with Receiver regarding same (0.3); call with Property Manager (0.2); call with Receiver regarding various settlements (0.1); call and draft email with Navitas (0.3).	RML	\$525.00	1.10	\$577.50
07/24/2023	Jauregui - Email exchange and call with opposing counsel regarding settlement negotiations.	RML	\$525.00	0.20	\$105.00
07/24/2023	Alfaro - Work on analysis of claims strategy.	RML	\$525.00	0.20	\$105.00
07/24/2023	Rasco - Formulate areas for joint case management report.	RML	\$525.00	0.20	\$105.00
07/24/2023	(D&O) Telephone call with M. Davis regarding damage analysis from forensics (.3); reviewing forensics and discuss production to opposing counsel regarding damage analysis in furtherance of potential settlement (.8).	MME	\$550.00	1.10	\$605.00
07/24/2023	Rasco Klock - Assess pleading strategy (.2); begin drafting case management report (.4).	CP	\$275.00	0.60	\$165.00

07/24/2023	Danton - Assess file and Disco data base for L. Dorado regarding request for estoppel certificates.	CP	\$275.00	0.70	\$192.50
07/24/2023	Emails with Receiver, E. Thompson and counsel for Advisory Board regarding the District Court's Judgment on the Association's appeal of the Bankruptcy Court's orders in the Ceperos Bankruptcy case and scheduling call to discuss same and strategy for further proceedings in Bankruptcy Court (.2); telephone call with counsel for the Ceperos regarding the Judgment and seeking Status Conference before Bankruptcy Court and further strategize regarding same (.2); telephone call with Receiver, E. Thompson, and counsel for Advisory Board regarding the District Court's Order denying Motion for Reconsideration and Judgment in the Ceperos appeal, the need for clarification of same, the applicable rules and standard of proof, and strategy for proceeding before Bankruptcy Court, and related matters (1.1); discuss same with M. Damian and C. Perez (.1); telephone call with E. Thompson regarding the applicable Federal Rule of Bankruptcy Procedure and standard of proof and case law in support of clarification and further strategize regarding same (.2); follow up on status of obtaining productions from banks we served with Subpoenas for purposes of completing account reconstruction and receive update regarding same (.1); review Motion to approve settlement with Sarmina Cetraro Law Group and proposed Order granting same (.1); emails with FSR regarding scheduling call to discuss documents produced by RevoPay and confirm availability (.1); emails with M. Damian regarding the status of the crime insurance carrier's decision regarding payment of our demand for the policy limits and communications with the carrier's counsel regarding same and provide direction to A. Pavon regarding further communications with counsel (.1).	KDM	\$525.00	2.20	\$1,155.00
07/24/2023	Receipt and review email from defense counsel and proposed agreed Motion for Extension of Time to File Case Management Report.	TAC	\$525.00	0.10	\$52.50
07/25/2023	Email exchange with D. Blumenthal regarding update on crime policy case determination.	AP	\$325.00	0.10	\$32.50
07/25/2023	Alfaro - Work on litigation strategy.	RML	\$525.00	0.10	\$52.50
07/25/2023	Review and revise Navitas agreement.	RML	\$525.00	0.50	\$262.50
07/25/2023	Danton - Call with Chase subpoena processing regarding missing subpoena response (.3); work on subpoena compliance (.3); draft demand letter to R. Pardo (.3).	CP	\$275.00	0.90	\$247.50
07/25/2023	Alfaro - Review and analyze documents produced by, and related to, Alfaro & Fernandez and draft amended complaint.	RML	\$525.00	1.50	\$787.50
07/25/2023	Rasco Klock - Draft case management report (1.8); assess H. Napoleon's first set of interrogatories (.2); apply edits to report (.5).	CP	\$275.00	2.50	\$687.50
07/25/2023	Alfaro - Review additional production related to claims against E. Alfaro.	CP	\$275.00	1.30	\$357.50
07/25/2023	Rasco - Review and revise draft case management report.	RML	\$525.00	0.50	\$262.50

07/25/2023	Reviewing and revising letter to counsel for defendants in the D & O action (.4); reviewing pool permit issues and responding (.2); reviewing delinquency report and emails regarding same (.2).	MME	\$550.00	0.80	\$440.00
07/25/2023	Telephone call and email with FSR regarding certain homeowners' claims to having paid Association through RevoPay and obtaining addition information and records from RevoPay and discuss with team members (.2); email from FSR providing records and information for purposes of having RevoPay assist with reconciliation issue, review same, and prepare and send email to RevoPay requesting assistance (.3); emails with counsel for crime insurance policy carrier and A. Pavon regarding the status of carrier's consideration of Receiver's claim and proof of loss and supporting documents and our response to ROR letter and provide update to M. Damian regarding same (.2); emails with Veritext Community Bank regarding the Receiver's Subpoena and review same (.1); review Agreed Order approving settlement with Sarmina Cetraro Law Group (.1); emails with Popular Bank and FSR regarding homeowners payments to a lockbox at the bank and emails from the Bank to homeowners regarding same, further emails with FSR regarding same, and provide input regarding further investigation of payments (.2); multiple emails with counsel for the Ceperos regarding the District Court's Judgment, effect of same, and whether Bankruptcy Court was directed to hold another evidentiary hearing on punitive damages, and review Opinion and Order for such language (.3); emails with team members regarding production from bank and coordinate sending to forensic accountant (.1).	KDM	\$525.00	1.50	\$787.50
07/25/2023	Prepare letter to defense counsel enclosing documentary support for demand.	TAC	\$525.00	0.30	\$157.50
07/26/2023	Navitas - Revise agreement and email exchange with Navitas regarding same.	RML	\$525.00	0.60	\$315.00
07/26/2023	Alfaro - Continue to draft amended complaint.	RML	\$525.00	0.40	\$210.00
07/26/2023	Rasco - Prepare for (0.4) and attend case management conference with opposing counsel (0.5).	RML	\$525.00	0.90	\$472.50
07/26/2023	Rasco Klock - Draft proposed case management schedule (.7); attend case management conference (.6); edit case management report and proposed schedule (.3).	CP	\$275.00	1.60	\$440.00
07/26/2023	Email exchanges and communication with M. Vazquez regarding update on PO Box and Banco Popular.	AP	\$325.00	0.20	\$65.00
07/26/2023	Cepero - Review and analyze email from opposing counsel regarding hearings on motion to dismiss.	RML	\$525.00	0.10	\$52.50
07/26/2023	Reviewing and responding to emails regarding sub association, and delinquency protocol (.5) telephone call with co-counsel and Receiver regarding various operational issues at the Hammocks (1.1).	MME	\$550.00	1.60	\$880.00
07/26/2023	Reviewing and revising motion for demolition and revising financing proposal and emails regarding same with Receiver, co-counsel and lender.	MME	\$550.00	1.40	\$770.00

07/26/2023	Multiple emails with counsel for the Ceperos regarding various findings in the District Court's Opinion and Order and Judgment, the Ceperos's intention to request a status conference in Bankruptcy Court, to schedule another evidentiary hearing, and to seek to vacate the Judgment entered by Judge Scola (.3); prepare and send email to Receiver and E. Thompson regarding same and strategy for proceedings in District Court and Bankruptcy Court, review relevant portions of Judge Scola's and Judge Isicoff's orders and Judgments, and exchange further emails with E. Thompson and Receiver regarding same (.5); email from Ceperos's counsel forwarding Motion to Vacate District Court's Judgment, review same, strategize regarding response arguments, exchange emails with Receiver and E. Thompson regarding preparation of Response, provide direction to A. Pavon regarding same and research to be done, and strategize with C. Perez regarding same (.6); review Ceperos's counsel's letter to Bankruptcy Court requesting status conference and proving their position District Court's Judgment and further emails with counsel regarding objection to representations in letter (.2); further emails with FSR regarding the lockbox at Popular Bank to which homeowners previously sent payments (.1); multiple emails with Popular Bank, FSR, A. Pavon, and the Receiver regarding balance in account at Popular Bank, lockbox associated with that account where homeowners were sending payments, the closing of that lockbox, and the payment of the loan balance, and review records provided by Popular Bank and FSR regarding same (.4).	KDM	\$525.00	2.10	\$1,102.50
07/27/2023	Email exchange with USPIS regarding investigation on PO Box and direction to stop investigation.	AP	\$325.00	0.10	\$32.50
07/27/2023	Email exchange with M. Vazquez regarding PO Box in Arizona	AP	\$325.00	0.10	\$32.50
07/27/2023	Review of documents produced by CIT for Hammock Bank statements (.2); email exchange with S. Banez to produce same (.1); email exchange with Ally Bank and Auto Nation to facilitate sale of vehicles (.1)	AP	\$325.00	0.40	\$130.00
07/27/2023	Review and analysis of Motion to Vacate "Judgment" entered July 20, 2023 as Void in Cepero Appeal 22-22686	AP	\$325.00	0.60	\$195.00
07/27/2023	Email exchange with Navitas (0.1); work on completion of payment and agreement (0.3).	RML	\$525.00	0.40	\$210.00
07/27/2023	Alfaro - Work on amended complaint.	RML	\$525.00	0.20	\$105.00
07/27/2023	Reviewing and executing documents for playground equipment financing.	MME	\$550.00	0.40	\$220.00
07/27/2023	Rasco - Assess Rasco Klock reply regarding motion to dismiss.	CP	\$275.00	0.20	\$55.00
07/27/2023	Danton - Work on subpoena compliance issues with Chase.	CP	\$275.00	0.40	\$110.00

07/27/2023	Multiple emails with Popular Bank and FSR regarding the recent payment of the balance of the loan and coordinate tracking check and confirming application to loan account, and receive updates regarding same (.3); telephone call with Popular Bank regarding same and resolving issue with payment and further discuss with team members (.2); emails with FSR and Receiver regarding transferring account balance to the Association's CNB account and closing accounts at Popular Bank after loan balance is paid, send email to Bank requesting instructions to transfer account balance and close accounts, and follow up on tracking loan payoff check (.3); eview letter that the Ceperos's counsel sent to Bankruptcy Court presenting argument regarding District Court's Judgment and remand to Bankruptcy Court, exchange emails with Receiver and E. Thompson regarding same and preparing Notice to file in Bankruptcy Court regarding status of appeal, strategize with C. Perez regarding same, and coordinate preparation of Notice (.4); discuss with C. Perez Bankruptcy Court procedures and provide direction to A. Pavon regarding preparation of Notice (.2); emails with team members regarding non-service of Subpoenas on two vendors and coordinate locating updated addresses for service (.1); review emails with AutoNation and A. Pavon regarding the proposal for the purchase of certain vehicles and moving forward with sales and follow up on same (.1); emails with A. Pavon and forensic accountant regarding the records obtained from CIT Bank necessary to complete forensic reconstruction (.1).	KDM	\$525.00	1.70	\$892.50
07/28/2023	Klock - Review and revise draft case management report and required case management schedule (0.7); work on litigation strategy (0.2); work on mediation strategy (0.2); draft email to client regarding case management conference (0.1).	RML	\$525.00	1.20	\$630.00
07/28/2023	Review and analyze email from Property Manager regarding lease renewal and draft response (0.1); review and analyze email from M. Ernst and draft response (0.5).	RML	\$525.00	0.60	\$315.00
07/28/2023	Work on deposition of Santiago Legal.	RML	\$525.00	0.10	\$52.50
07/28/2023	Work on claims strategy for potential fraudulent transfer claims.	RML	\$525.00	0.10	\$52.50
07/28/2023	Review of German Campos' file at Alfaro & Fernandez following complaint of discrepancies in ledger (.5); telephone call with attorney for G. Campos (.1); email exchange with M. Vazquez regarding G. Campos ledger (.1).	AP	\$325.00	0.70	\$227.50
07/28/2023	Reviewing Hermida Law motion to dismiss and email regarding response (.4); reviewing request from Board member (.2); telephone call with Receiver regarding request by Hammock committee (.3).	MME	\$550.00	0.90	\$495.00
07/28/2023	Call with Receiver regarding insurance renewal.	RML	\$525.00	0.20	\$105.00
07/28/2023	Danton - Work on obtaining compliance from Chase regarding overdue subpoena responses.	CP	\$275.00	0.80	\$220.00

07/28/2023	Rasco Klock - Review and apply additional edits to case management report (.3); assess multiple correspondence regarding case management conference (.2).	CP	\$275.00	0.50	\$137.50
07/28/2023	Further emails and telephone call with Popular Bank regarding payment of loan balance and process for transferring account balance to Association and closing accounts, and emails with FSR regarding same (.3); email from Receiver regarding same, telephone call from and emails with FSR regarding wire transfer to pay off loan, authorization form, and wire instructions (.2); review and have authorization form signed, discuss with M. Damian, send to Popular Bank and FSR, and coordinate following up on receipt of wire transfer (.2); emails with FSR regarding communications with company purportedly handling collections on several accounts and discuss with team members same and further investigation needed (.2); email from and discuss with R. Landy insurance issues (.1); review and revise draft Motion to alter or amend District Court's Judgment or for clarification and exchange emails with Receiver and E. Thompson regarding same (1.4).	KDM	\$525.00	2.40	\$1,260.00
07/29/2023	Reviewing proposed Advisory Board rules and emails regarding same.	MME	\$550.00	0.30	\$165.00
07/29/2023	Hermida - Email exchange with Mr. Quinion regarding motion to transfer.	RML	\$525.00	0.20	\$105.00
07/29/2023	Klock - Draft email to opposing counsel regarding mediation.	RML	\$525.00	0.10	\$52.50
07/30/2023	Review and revise subpoenas duces tecum to Yadel Santiago and Santiago Legal.	RML	\$525.00	0.20	\$105.00
07/31/2023	Klock - Review and analyze email from opposing counsel regarding mediation.	RML	\$525.00	0.10	\$52.50
07/31/2023	Jauregui - Work on litigation strategy.	RML	\$525.00	0.10	\$52.50
07/31/2023	Email exchange with D. Blumenthal regarding crime policy and claim status.	AP	\$325.00	0.10	\$32.50
07/31/2023	Draft notice providing status of appeal and recommendation as to evidentiary hearing.	AP	\$325.00	0.90	\$292.50
07/31/2023	Review and analyze email from Property Manager regarding insurance renewal and confer with K. Murena regarding same.	RML	\$525.00	0.20	\$105.00
07/31/2023	Danton - Briefly assess production from Chase bank (.2); correspondence with forensic accountant regarding additional production (.1).	CP	\$275.00	0.30	\$82.50
07/31/2023	Work on subpoenas and responsive documents (0.1); review and analyze documents provided by Excellent Services (0.2); call with counsel for Leaf (0.2).	RML	\$525.00	0.50	\$262.50
07/31/2023	Hermida - Email exchange with opposing counsel regarding transfer motion.	RML	\$525.00	0.10	\$52.50

07/31/2023	<p>Emails with E. Thompson and Receiver regarding final revisions to Motion to alter or amend District Court's Judgment and conferring with counsel for the Ceperos regarding same and review emails with counsel requesting position on relief requested (.2); emails with counsel for Ceperos for purposes of conferral on the Motion and timing of confirming position, and emails with E. Thompson and Receiver regarding same (.2); review Order denying without prejudice the Ceperos's Motion to Vacate Judgment, emails with counsel for Ceperos's regarding the Receiver's position on the Motion for purposes of Corrected Motion to be filed, discuss with A. Pavon and C. Perez same and new deadline to respond, and emails with E. Thompson and Receiver regarding same and requesting copy of Motion prior to filing for purposes of conferral (.3); discuss with C. Perez and provide direction to A. Pavon regarding preparation of Notice to file in Bankruptcy Court regarding status of appeal (.2); emails with M. Damian and A. Pavon regarding following up with counsel for crime policy carrier regarding determination of Receiver's claim and emails with A. Pavon and counsel regarding same and scheduling call to discuss (.1); further emails with counsel for Ceperos regarding their letter to the Court regarding the District Court's Judgment and seeking to vacate same (.1); emails with Popular Bank and FSR regarding the status of payment of the loan balance (.1); discuss with R. Landy renewal of certain insurance policies and obtaining proposals for same, and certain issues with insurance agent, and send email to agent requesting proposals for renewals (.2); email from A. Pavon providing draft Notice to file in Bankruptcy Court regarding status of the Ceperos's appeal and responding to the Ceperos's letter to Court and review same (.2).</p>	KDM	\$525.00	1.60	\$840.00
08/01/2023	<p>Email exchange with P. Arcia attorney for G. Campos regarding ledger dispute (.1); email exchange with M. Vazquez to provide update on G. Campos (.1); email exchange with Ally Bank and auto nation regarding status of sale (.1); Email exchange with K. Murena and M. Vazquez regarding Axiom Resources (.1); review of documents pertaining to Axiom Resources to provide direction to M. Vazquez (.3).</p>	AP	\$325.00	0.70	\$227.50
08/01/2023	<p>Review of 32 ledgers and missing payments (.5); email exchange with M. Vazquez regarding Alfaro and Fernandez missing payments (.1).</p>	AP	\$325.00	0.60	\$195.00
08/01/2023	<p>Email exchange with Property Manager regarding warehouse lease and draft email to Receiver regarding same (0.2); review and analyze email from counsel for Leaf and draft email to Receiver regarding same (0.1).</p>	RML	\$525.00	0.30	\$157.50
08/01/2023	<p>Herminda - Call with Jose Quinion (0.1); work on litigation strategy (0.1).</p>	RML	\$525.00	0.20	\$105.00

08/01/2023	Emails with counsel for crime insurance carrier and A. Pavon regarding status of investigation of claim and proof of loss and counsel's communications with carrier regarding same and send email to M. Damian regarding same (.1); emails with insurance agent regarding renewal of D&O policy and the status of obtaining proposals for same and send email to R. Landy regarding same (.2); receive notice that Court docketed the Ceperos's counsel's letter to the Court as a Motion to set status conference , emails with team members regarding deadline to respond to same, discuss with C. Perez, and provide direction regarding preparation of Response (.3); review Order setting hearing on Ceperos's Motion and emails with Receiver and team members regarding registering to appear at hearing by Zoom and preparation and deadline to file Response to Motion (.1); emails with A. Pavon and Ally Bank regarding status of sending payoff letters to AutoNation for purposes of sale of vehicles (.1); review Order closing the Association's appeal of Order denying Rule 60 Motion in light of ruling in Association's first appeal of Bankruptcy Court's contempt and damages orders and emails with Receiver and E. Thompson regarding same and scheduling call to discuss (.2); email from A. Pavon to FSR regarding investigation of Axiom Resource's involvement with Association, funds it may have collected from homeowners, and possible termination of relationship, review documents regarding same, and discuss with team members (.2).	KDM	\$525.00	1.20	\$630.00
08/01/2023	[Cepero Bankruptcy] (No charge) Review and analyze Debtor's motion to set status conference regarding appellate matters and notice regarding same (.2); review court file (.1); emails to and from K. Murena regarding same (.1).	rs		0.40	\$0.00
08/01/2023	[Cepero Bankruptcy 2nd Appeal] (No charge) Receipt and review of order closing appellate case.	rs		0.10	\$0.00
08/02/2023	Rasco - Work on completion of joint case management report (0.1); confer with Receiver regarding case management conference (0.1); prepare for cases management conference (0.1).	RML	\$525.00	0.30	\$157.50
08/02/2023	Cepero - Work on strategy for hearing on motion for relief from order.	RML	\$525.00	0.10	\$52.50
08/02/2023	Email correspondence with M. Vazquez regarding Axiom Resources and providing instruction (.1); email exchange with D. Blumentahal to follow-up on status of crime policy claim (.1); email exchange with T. Rementeria to obtain documents needed to renew d & o insurance (.1).	AP	\$325.00	0.30	\$97.50
08/02/2023	Call with Property Manager rereading warehouse lease and email exchange with Receiver regarding same.	RML	\$525.00	0.20	\$105.00



08/02/2023	Further emails with team member regarding upcoming hearing on the Ceperos's Motion for Status Conference and follow up on status of preparation of Response to that Motion, and provide further input regarding same (.2); emails with E. Thompson and Receiver regarding upcoming call to discuss closing of second Ceperos's appeal (.1); emails with counsel for Ceperos's and E. Thompson regarding their objection to Motion to alter or amend District Court's Judgment and review final filed version of Motion (.2); emails with M. Damian and A. Pavon regarding scheduling call with counsel for crime insurance carrier and upcoming town hall meeting with homeowners, emails with carrier's counsel regarding same, confirm availability, and strategize for call (.2); emails with insurance agent regarding financial and other information needed to obtain proposals for new D&O policy and emails with A. Pavon regarding same (.2); emails with R. Landy and E. Thompson regarding upcoming hearing on Ceperos's Motion to lift stay (.1); email from Popular Bank confirming loan was paid off and sending form to close account, review form, and coordinate completing and having Receiver sign, and send further email to Bank regarding same (.2); emails with Popular Bank regarding request for statements for the credit card account with prior balance that went to collections (.1); further emails with A. Pavon and FSR regarding investigation of company previously engaged by Association to collect amounts from homeowners and whether Receiver will authorize their continued services (.1); emails with A. Pavon regarding her latest communications with accountant investigating evidence presented in support of proof of loss for crime insurance claim (.1); email from Receiver's office regarding various bankruptcy cases in which Association is creditor and related foreclosure cases, emails with Receiver regarding same, and send email to team members regarding investigating bankruptcy cases (.2).	KDM	\$525.00	1.70	\$892.50
08/02/2023	[Cepero Bankruptcy] (No charge) Emails from and to C. Murena regarding Debtor's motion for status conference (.1); register for hearing on motion (.1).	rs		0.20	\$0.00
08/03/2023	Rasco - Call with opposing counsel regarding joint case management report (0.3); review and revise proposed case management schedule based upon comments of opposing counsel (0.3); review and revise revisions to joint case management report from opposing counsel and competing scheduling order, revise portions of Plaintiff's schedule and report additions, and email exchange with opposing counsel regarding same (0.7).	RML	\$525.00	1.30	\$682.50
08/03/2023	Three telephone calls exchange with M. Vazquez regarding financials and Axiom (.4); email exchange with T. Rementeria regarding D&O Policy renewal and financials (.2).	AP	\$325.00	0.60	\$195.00
08/03/2023	Review of foreclosure defendants in bankruptcy for hammocks properties.	AP	\$325.00	0.50	\$162.50

08/03/2023	Cepero - Work on litigation strategy and prepare arguments for hearing on motion for relief from stay (0.3); call with E. Thomson regarding hearing strategy on motion for relief from order (0.2); research regarding stay of subsequently filed state court action (0.2).	RML	\$525.00	0.70	\$367.50
08/03/2023	Draft response in opposition to Debtor's Motion for Status Conference, incorporating court hearing transcript, findings of appeal court, and argument on same.	AP	\$325.00	4.60	\$1,495.00
08/03/2023	Rasco - Review order and case management binder (.3); work on preparing responsive documents to 1100 records request (.3).	CP	\$275.00	0.60	\$165.00
08/03/2023	Email exchange regarding Ghilardi property.	RML	\$525.00	0.10	\$52.50
08/03/2023	Telephone call with Trustee regarding collection issues, town hall and other pending matters (.6); reviewing issue regarding Ghilardi's home (.2).	MME	\$550.00	0.80	\$440.00
08/03/2023	Emails with team members regarding docket reports for various bankruptcy cases of homeowners, review same, discuss with A. Pavon, and strategize regarding effect on Association and actions to recommend to the Receiver (.3); review Notice of Case Management Conference in D&O Action and transfer of case to Judge Butchko and discuss with team members (.1); emails with Popular Bank regarding transferring account balance to the Association by check, review and work on completing form, coordinate having Receiver sign and submit it to bank, review completed form, and further emails with M. Dhanji regarding same (.3); telephone call with Receiver and E. Thompson regarding Order closing second Ceperos's appeal of denial of Rule 60 motion with leave to seek to reopen and strategy regarding same and arguments in Answer Brief for third appeal of order denying motion for attorneys' fees (.3); emails with A. Pavon and insurance agent regarding financial records requested to obtain proposals for replacement D&O policy and review same (.1); meet with R. Landy regarding upcoming hearing on Ceperos's motion to lift stay to proceed with lawsuit against Association, the claims alleged therein, their bankruptcy proceedings and related appeals, and related matters, and emails with R. Landy and E. Thompson regarding case law for the hearing on stay relief motion (.5); review Answers filed in D&O Action (.2); review entry of District Court Order closing second Ceperos appeal docketed in Bankruptcy Case and discuss with team members (.1); emails with A. Pavon regarding draft Response to Ceperos's Motion for Status Conference and provide direction regarding revisions to same (.2); emails with FSR and Receiver regarding confirmation of closing accounts at Popular Bank and transfer of account balance to Association (.1).	KDM	\$525.00	2.20	\$1,155.00
08/03/2023	Receipt and review Defendants Madeline Maceda, Ligia Calpielo, Luz Ordonez and Marlene Kopec's Answers and Affirmative Defenses to Complaint.	TAC	\$525.00	0.80	\$420.00
08/04/2023	Rasco - Review and revise letter to Court regarding case management hearing.	RML	\$525.00	0.10	\$52.50
08/04/2023	Email exchange with property manager.	RML	\$525.00	0.10	\$52.50

08/04/2023	Draft and revise motion in opposition to include summary of appeal case and background on previous evidentiary hearing.	AP	\$325.00	1.80	\$585.00
08/04/2023	Telephone call with Goldberg Segalla to discuss crime policy status.	AP	\$325.00	1.00	\$325.00
08/04/2023	Emails with R. Landy regarding insured v. insured argument and provide direction and analysis regarding same (.4); prepare for and attend call with counsel for crime policy carrier and A. Pavon to discuss their investigation of claim, proof of loss, and supporting documentation, additional documentation and information requested, legal issues raised in reservation of rights letter, possible mediation or litigation, and related matters, and discuss with A. Pavon same and documents to send to counsel (1.3); emails with R. Landy and E. Thompson regarding upcoming hearing on Ceperos's motion to lift stay and case law to submit to the Court (.1); further emails with insurance agent regarding financials needed to obtain proposals for replacement D&O policy and timing of obtaining proposals (.1); emails with R. Landy and A. Pavon and discuss with A. Pavon other insurance agent used by FSR seeking exclusivity with Association, provide direction regarding responding to FSR regarding same, and review email to FSR regarding same (.2); emails with agent regarding same (.email and letter from accountant for insurance carrier investigating crime policy claim regarding status of investigation and discuss with team members (.2); emails with A. Pavon and C. Perse regarding status of filing action against security company (.1).	KDM	\$525.00	2.40	\$1,260.00
08/04/2023	Danton - Conduct DISCO search for lease documents related to Rofevir vendors (.7); assess multiple correspondence regarding hearing on Ceparo action (.1).	CP	\$275.00	0.80	\$220.00
08/04/2023	Rasco - Work on finalizing case management report (.3); begin drafting responses to Plaintiff's interrogatories (.7).	CP	\$275.00	1.00	\$275.00
08/04/2023	Telephone conference with Melanie Damian and attorney Edwin Cruz regarding settlement discussions.	TAC	\$525.00	0.30	\$157.50
08/07/2023	Reviewing and organizing homeowner questions (.6); reviewing financial reports and e-mails to FSR (.4); preparation session and update with Receiver and team for town hall (1.1).	MME	\$550.00	2.10	\$1,155.00
08/07/2023	Draft response email and meeting regarding timing of denial of claim and breach of contract and bad faith claims against insurer and research same.	CPM	\$500.00	1.40	\$700.00

08/07/2023	<p>Emails with M. Damian, E. Thompson and Receiver regarding recent call with counsel for the crime policy carrier regarding the status of their consideration of documents in support of proof of loss and determination of Receiver's claim, the possibility of commencing action against carrier, possible mediation of claim, and related matters (.2); emails with Receiver and C. Perez regarding filing action against carrier, and strategize with C. Perez regarding the timing of same (.2); receive confirmation of service of Subpoena on Veritext Community Bank, discuss with team members, emails with the Bank regarding same, issue with Subpoena, and the results of their search for accounts, and emails with A. Pavon regarding resolving issue (.2); further emails with insurance agent regarding obtaining proposals for replacement D&amp;O policy and discuss with team members (.2); discuss with team members upcoming hearing on Ceperos's Motion for status conference and registering for Zoom appearance and receive confirmation of same (.1); emails with E. Thompson and A. Pavon regarding the status of selling vehicles to AutoNation and emails with A. Pavon and Ally Bank regarding the status of sending updated payoff letters and follow up on receipt of same (.2); telephone call from and emails with counsel for Ceperos's regarding their proposed letter to Bankruptcy Court requesting cancellation of hearing on their motion for status conference in light of Receiver's Motion to alter or amend judgment and their Renewed Motion to Vacate Judgment, review letter, and emails with Receiver and E. Thompson regarding same (.2); emails with counsel for Ceperos's regarding Renewed Motion to Vacate Judgment and review same (.3).</p>	KDM	\$525.00	1.60	\$840.00
08/07/2023	<p>Emails to and from Edwin Cruz regarding Plaintiff's demand letter.</p>	TAC	\$525.00	0.40	\$210.00
08/08/2023	<p>Danton - Conduct database search for documents related to Deco Enterprises.</p>	CP	\$275.00	0.50	\$137.50
08/08/2023	<p>Review and analyze email from M. Ernst and draft response (0.1); email exchange with Property Manager regarding lease renewal (0.1).</p>	RML	\$525.00	0.20	\$105.00
08/08/2023	<p>Emails and calls regarding security, operational issues and financial issues in preparation for town hall (.6); moderating Town Hall (1.0).</p>	MME	\$550.00	1.60	\$880.00

08/08/2023	Email from Ceperos's counsel regarding letter sent to Bankruptcy Court requesting cancellation of Status Conference given their Renewed Motion to Vacate District Court's Judgment, review letter, and emails with team members regarding response deadline (.2); emails with E. Thompson regarding preparation of Response to the Renewed Motion and strategize regarding same (.2); email from E. Thompson regarding Notice of Filing Cases for purposes of hearing on Ceperos's Motion to lift stay to proceed with litigation against Association and review same (.2); review further emails with Ally Bank regarding the payoff letter for proposed sale of vehicles to AutoNation and additional information needed for same, follow up on status of sale, and receive update from A. Pavon regarding same (.2); email from Veritext Community Bank regarding Subpoena and efforts to locate accounts and provide direction to A. Pavon regarding providing additional information to Bank to locate accounts (.1); email from counsel for crime policy carrier requesting various documents previously provided to adjuster and accountant for the carrier, forward entire production and sharefile link to A. Pavon, and coordinate providing to attorney and having forensic accountant grant attorney access to sharefile (.2); review and revise Receiver's Answer Brief in Ceperos's appeal of Bankruptcy Court's denial of motion for attorneys' fees and send to E. Thompson to finalize and file (1.2).	KDM	\$525.00	2.10	\$1,102.50
08/09/2023	Compiling, organizing, and analysis of documents requested for crime policy claim (272 files, 60 folders) (1.6); email correspondences and email exchanges with M. Davis in preparation of same (.3).	AP	\$325.00	1.90	\$617.50
08/09/2023	Draft rental agreement for clubhouse to include deposit, purpose, and tenant responsibility.	AP	\$325.00	1.20	\$390.00
08/09/2023	Rasco - Work on argument for motion to dismiss (0.6); prepare for case management conference (0.5); attend case management conference (1.5); work on litigation strategy related to outcome of case management conference (0.3).	RML	\$525.00	2.90	\$1,522.50
08/09/2023	Call with State Attorneys' office regarding witness and documents (0.8); call with Receiver regarding witness strategy (0.4).	RML	\$525.00	1.20	\$630.00
08/09/2023	Hermida - Formulate grounds for response to motion to dismiss.	RML	\$525.00	0.20	\$105.00
08/09/2023	Work on strategy for rental contract.	RML	\$525.00	0.10	\$52.50
08/09/2023	Danton - Review DECO production regarding confidential materials (.8); correspondence with investigator regarding materials (.1).	CP	\$275.00	0.90	\$247.50
08/09/2023	Responding to homeowner regarding financial issue (.2); reviewing and signing towing contract (.3); reviewing financials and approving operational expenses in AVID (.4).	MME	\$550.00	0.90	\$495.00

08/09/2023	Emails with E. Thompson regarding finalizing Answer Brief in Ceperos's appeal of Bankruptcy Court's Order denying motion for fees and discuss with team members (.2); further emails with E. Thompson regarding preparation of Response to Ceperos's Renewed Motion to Vacate Judgment and conferral with Ceperos's counsel prior to their filing Motion and provide input regarding same (.2); further emails with Ally Bank and A. Pavon regarding the proposed sales to AutoNation and follow up on same (.1); strategize with C. Perez and P. Baloyra regarding legal requirements for filing bad faith action against carrier, review applicable statute and procedures, and summary of same from C. Perez, prepare and send email to Receiver regarding same, addressing his concerns, providing update regarding dealings with counsel for carrier, and proposing strategy going forward (.6); telephone call with A. Pavon regarding preparation of letter to carrier's counsel forwarding previously provided documents and demanding determination on claim by date certain, further strategize with C. Perez, and work with A. Pavon on compiling documents (.4); email from Receiver approving strategy, emails with team members regarding same, exchange emails with counsel for Advisory Board regarding same and scheduling call to discuss, and strategize with C. Perez regarding same (.4).	KDM	\$525.00	1.90	\$997.50
08/09/2023	[Cepero Bankruptcy] (No charge) Review and analyze notice of cancellation of status conference (.2); review court file (.1).	rs		0.30	\$0.00
08/10/2023	Draft, revise, review, and finalize Clubhouse Rental Agreement, incorporating guidelines, rules, clauses for deposits, cancellations, indemnity, liability, venue, attorneys' fees, and other terms.	AP	\$325.00	2.00	\$650.00
08/10/2023	Drafted letter to PIIC, highlighting the Receiver's documentation and its adequacy for claim approval, and delay consequences.	AP	\$325.00	2.60	\$845.00
08/10/2023	Email exchange with Veritex Bank regarding subpoena.	AP	\$325.00	0.10	\$32.50
08/10/2023	Hermida - Draft omnibus response to several motions to dismiss.	CP	\$275.00	7.90	\$2,172.50
08/10/2023	Alfaro - Assess motion to dismiss (.3); prepare brief outline regarding response (.2).	CP	\$275.00	0.50	\$137.50
08/10/2023	Research and analysis regarding Bringing breach of contract suit against insurance company and phone call and email regarding same.	CPM	\$500.00	2.20	\$1,100.00
08/10/2023	Responding to homeowner inquiry as a follow-up to town hall and checking website regarding same (.4); emails regarding ancillary action update (.4).	MME	\$550.00	0.80	\$440.00

08/10/2023	Further emails and telephone call with counsel for Advisory Board regarding strategy for pursuing crime insurance policy claim and commencing action against carrier, further strategize with team members regarding same, and provide direction to A. Pavon regarding preparation of letter to the carrier's counsel regarding all documents supporting Proof of Loss and demand determination and payment of policy proceeds (.5); review and revise letter to carrier's counsel and send to counsel for Advisory Board, A. Pavon, and C. Perez for review and further input (.8); email from E. Thompson forwarding draft Response to Ceperos's Motion to Vacate District Court's Judgment, email from Receiver regarding same, review and revise Response, and send to E. Thompson to finalize and file (1.1); email from FSR regarding information needed from RevoPay to resolve issue with reconciliation and send email to RevoPay following up on prior request and requesting additional information (.1); email from homeowner regarding the status of confirming her payments sent to former counsel for the Association and related matters and email from M. Dhanji to FSR regarding same and requesting confirming of application of check to homeowner's account (.1).	KDM	\$525.00	2.60	\$1,365.00
08/11/2023	Alfaro - Review and analyze motion to dismiss amended complaint (0.2); work on mediation (0.1).	RML	\$525.00	0.30	\$157.50
08/11/2023	Danton - Draft deposition outline for deposition of Sport's Surfaces, LLC (1.5); assess exhibits to use at deposition (.3); begin drafting Y. Santiago deposition outline (.8).	CP	\$275.00	2.60	\$715.00
08/11/2023	Jauregui - Draft email to opposing counsel regarding settlement or mediation.	RML	\$525.00	0.10	\$52.50
08/11/2023	Rasco - Work on litigation strategy.	RML	\$525.00	0.20	\$105.00
08/11/2023	Hermida - Finish first draft of response to motion to dismiss.	CP	\$275.00	0.50	\$137.50
08/11/2023	Finalize letter to PIIC and linke with responsive documents (.2); email correspondence with D. Blumenthal regarding crime policy claim (.1); email exchange with J. Cueva regarding deposit return (.1); telephone call with F. Cespedes regarding return of clubhouse rental deposit and review of documents provided regarding same (.2); email exchange with K. Veilleux regarding return of rental deposit (.1).	AP	\$325.00	0.70	\$227.50
08/11/2023	Reviewing and responding regarding request for approval regarding credit card.	MME	\$550.00	0.20	\$110.00

08/11/2023	Emails with counsel for Advisory Board approving proposed letter to counsel for crime policy carrier forwarding all previously provided documents in support of proof of loss and demand determination and payment of policy proceeds by date certain and further discuss with C. Perez finalizing the letter and obtaining Receiver approval (.2); send to Receiver draft letter with explanation and email from Receiver approving same, emails with A. Pavon regarding same, coordinate finalizing and serving letter with link to documents, and provide direction to team members regarding response deadline and formulation of claims (.3); emails with A. Pavon regarding producing to carrier's counsel additional documents requested for investigation (.1); further emails with RevoPay regarding information needed to resolve reconciliation issue raised by FSR related to homeowner payments to RevoPay and discuss with team members (.2); email from Truist Bank producing documents in response to latest Subpoena, download same, and coordinate sending to forensic accountant (.2); emails with A. Pavon and FSR regarding returning security deposit to homeowner for event that never took place (.1).	KDM	\$525.00	1.10	\$577.50
08/13/2023	Review and analyze documents and prepare for deposition of Sports Surfaces.	RML	\$525.00	0.50	\$262.50
08/13/2023	Rasco - Work on mediation scheduling and strategy.	RML	\$525.00	0.10	\$52.50
08/14/2023	Review and analyze clubhouse rental agreement (0.2); review and analyze Coral Commerce Center lease for renewal purposes (0.2).	RML	\$525.00	0.40	\$210.00
08/14/2023	Prepare for deposition of Sport Surfaces (0.3); attend deposition of Sport Surfaces and secure CNA (0.2).	RML	\$525.00	0.50	\$262.50
08/14/2023	Email exchange with S. Banez to provide missing statements for reconstruction (.1); email exchange with M. Vazquez to discuss June 2023 financials (.1); email exchange with Brown and Brown about insurance placement and providing requested information (.1).	AP	\$325.00	0.30	\$97.50
08/14/2023	Danton - Organize exhibits for Sports Surfaces deposition (.3); conduct search for communications and documents for use at Santiago deposition (.8); draft deposition outline for Santiago Law deposition (2.0).	CP	\$275.00	3.10	\$852.50
08/14/2023	Draft and revise clubhouse rental agreement to include monitor fee, insurance requirements for vendors/caterers, alcohol release forms, cleaning deposit, price list and schedule and clubhouse inspect list.	AP	\$325.00	2.30	\$747.50
08/14/2023	Email exchanges with trustee J. McConnell to obtain status of negotiations.	AP	\$325.00	0.20	\$65.00
08/14/2023	Email exchange with H. Lopez regarding stolen vehicle claim (.1); email exchange with M. Barad regarding reimbursements (.1); review status of pleadings in Rodriguez v Hammocks claim (.1); email exchange with adjuster D. Broderick on Glazer matter (.1); review status of pleadings in Lujan v Hammocks claim (.1).	AP	\$325.00	0.50	\$162.50



08/14/2023	Emails with A. Pavon regarding the latest production from Truist Bank for purposes of completing the Association's account reconstruction, grant access to downloaded production, and emails with forensic accountant regarding same (.2); emails with E. Thompson regarding finalizing and filing Response to Ceperos's Motion to Vacate District Court's Judgment and review filed version of same (.1); emails with insurance agent and A. Pavon regarding the latest financials needed to obtain proposal for D&O replacement policy and follow up on same (.1); emails with A. Pavon regarding the status of one personal injury action against Association and review emails with insurance counsel assigned to Association regarding same (.1); emails with A. Pavon and adjuster for another personal injury claim against the Association regarding status of investigation and information previously provided to adjuster (.1); emails with A. Pavon regarding the status of a third personal injury action against the Association and communications with adjuster, and coordinate contacting insurance counsel assigned Association for update (.1); email from Receiver's office regarding another action involving the Association in which a party filed for bankruptcy and emails with A. Pavon regarding investigating bankruptcy case (.2).	KDM	\$525.00	0.90	\$472.50
08/14/2023	Prepare for deposition of Santiago Legal.	RML	\$525.00	0.60	\$315.00
08/15/2023	Finalize clubhouse agreement to incorporate additional definitions and remove duplicative fees.	AP	\$325.00	0.80	\$260.00
08/15/2023	Telephone conference with M. Vazquez and M. Barad regarding ledger issues and applications of payments from Alfaro and Fernandez (.5); email exchanges and communications with M. Vazquez to obtain balance on residents in bankruptcy (.1); email exchange with Kubicki Draper to obtain status on Lujan matter (.1).	AP	\$325.00	0.70	\$227.50
08/15/2023	Danton - Work on Santiago Legal deposition preparation (.5); attend deposition of Santiago Legal and work on no show issues (.3); briefly review production from Santiago Legal (.6)	CP	\$275.00	1.40	\$385.00
08/15/2023	Reviewed dockets, analysis of bankruptcy plans, determined deadlines, analyzed procedures, and prepared strategy for bankruptcy cases: 1) in regarding Arboleda, (2) in regarding Navarro, (3) in regarding Martinez, (4) in regarding Trujillo, and (5) in regarding Sanibel Realty Trust; email exchange with Judge Gersten providing summary of in regarding Trujillo and upcoming deadline.	AP	\$325.00	1.40	\$455.00
08/15/2023	Jauregui - Draft case management report and proposed schedule.	CP	\$275.00	1.10	\$302.50
08/15/2023	Hermida - Revise omnibus response to motion to dismiss.	CP	\$275.00	1.20	\$330.00

08/15/2023	Work with A. Pavon to investigate and determine status of various bankruptcy cases of homeowners in litigation in which Association has an interest to provide report to Receiver and recommend course of action, emails with Receiver regarding same, review various filings in bankruptcy cases and coordinate calendaring deadlines, coordinate sending report and recommendation to Receiver, review and approve same, and email from Receiver approving same (.7); review Order Setting Case Management Deadlines and discuss with team members (.1); emails with RevoPay regarding information needed to transfer funds received from homeowners to the Association, emails with M. Dhanji regarding same, and request list of receipts and amount to be disbursed (.2); emails with A. Pavon and insurance counsel for Association regarding the status of personal injury action against Association (.1); email from forensic accountant regarding updated list of documents still needed from banks, updated inventory of bank records, and the status of tracing of improper transfers, review lists, and provide direction regarding obtaining remaining missing records (.2).	KDM	\$525.00	1.30	\$682.50
08/15/2023	Review and revise clubhouse rental agreement (0.9); prepare for deposition of Santiago Legal (0.3); attend depositions of Santiago Legal and obtain CNA (0.3); review and analyze portions of documents provided (0.2); work on resolution of equipment lease (0.1); email exchange with SAO (0.1).	RML	\$525.00	1.90	\$997.50
08/15/2023	Review and revise response to motion to dismiss.	RML	\$525.00	0.80	\$420.00
08/15/2023	Meeting with team, FSR regarding collection procedures (1.2); reviewing financials and emails regarding same (.4).	MME	\$550.00	1.60	\$880.00
08/16/2023	Review and analyze email from SAO (0.2); call with D. Wen regarding Leaf settlement negotiations (0.2); review and revise motion for order to show cause as to sport surfaces (0.3); email exchange with Property Manager regarding department of health inquiry (0.1); attend portion of call with Receiver regarding evaluation of attorneys' fees claims against the Association (0.4).	RML	\$525.00	1.20	\$630.00
08/16/2023	Jauregui - Review and revise draft case management report.	RML	\$525.00	0.20	\$105.00
08/16/2023	Alfaro - Formulate argument in opposition to motion to dismiss amended complaint.	RML	\$525.00	0.20	\$105.00
08/16/2023	Cepero - Prepare for hearing on motion to dismiss.	RML	\$525.00	0.10	\$52.50
08/16/2023	Reviewing budget proposal (.4); meeting with Receiver and co-counsel regarding budget and acillaries issues (.8).	MME	\$550.00	1.20	\$660.00
08/16/2023	Alfaro - Draft response to motion to dismiss.	CP	\$275.00	4.10	\$1,127.50
08/16/2023	Jauregui - Assess Defendant's changes to case management report.	CP	\$275.00	0.10	\$27.50
08/16/2023	Danton - Correspondence with P. Arcia regarding final settlement payment (.1); assess production from Santiago Law (1.4).	CP	\$275.00	1.50	\$412.50

08/16/2023	Emails to and from Edwin Cruz regarding deposition dates for all Defendants.	TAC	\$525.00	0.20	\$105.00
08/16/2023	Emails with team members regarding preparing Notices of Appearance for various bankruptcy cases of homeowners, review and revise same, and coordinate filing (.2); emails with team members regarding various hearings and deadlines in bankruptcy cases of homeowners in which Hammocks is a creditor, review Notices and underlying Motions, and provide direction regarding same (.3).	KDM	\$525.00	0.50	\$262.50
08/16/2023	Emails to and from A. Pavon regarding additional bankruptcy cases (.3); draft notices of appearance for additional bankruptcy cases (.5).	rs	\$100.00	0.80	\$80.00
08/17/2023	Cepero - Prepare for hearing on motion to dismiss (0.2); attend hearing on motion to dismiss (1.1); email exchange with opposing counsel regarding hearing on motion for relief from order (0.1); draft order on motion to dismiss (0.3).	RML	\$525.00	1.70	\$892.50
08/17/2023	Jauregui - Edit case management report and proposed schedule.	CP	\$275.00	0.30	\$82.50
08/17/2023	Formulate arguments in response to motion to dismiss.	RML	\$525.00	0.10	\$52.50
08/17/2023	Jauregui - Work on planning for case management conference.	RML	\$525.00	0.10	\$52.50
08/17/2023	Draft order on motion to dismiss.	RML	\$525.00	0.20	\$105.00
08/17/2023	Emails from insurance agent forwarding proposal for D&O policy, outdoor property, and wind buy back policies, review same, emails with A. Pavon regarding same, and coordinate preparing summary for Receiver with analysis regarding premiums, deductible, coverages, and other details (.4); review Amended Judgment and Order granting Ceperos's Motion to Vacate Judgment and Receiver's Motion to Alter or Amend Judgment, strategize regarding effect of same, and emails with Receiver and E. Thompson regarding same and scheduling call to discuss (.6); further emails with RevoPay and M. Dhanji regarding coordinating transfer of homeowner payments to the Association's CNB account and follow up on status of same (.1).	KDM	\$525.00	1.10	\$577.50
08/18/2023	Cepero - Review and analyze email from opposing counsel and draft response.	RML	\$525.00	0.10	\$52.50
08/18/2023	Email exchange with Property Manager regarding permit matter.	RML	\$525.00	0.10	\$52.50
08/18/2023	Reviewing PCard request and responding (.2); meeting with team regarding budget (1.0).	MME	\$550.00	1.20	\$660.00

08/18/2023	Emails with E. Thompson and Receiver regarding upcoming call to discuss the District Court's Order granting Motion to Alter or Amend and Ceperos's Motion to Vacate Judgment, the effect of the Amended Judgment, and strategy before Bankruptcy Court and prepare for call (.2); attend call and strategize regarding the foregoing (.5); further emails with insurance agent and FSR regarding the different options for replacement and renewal insurance policies for D&O, outdoor property, and wind buy-back coverage, review options, and provide direction to A. Pavon regarding same and the deadline to renew policies (.3); email forwarding invoice for premium payment for certain insurance policies, review invoice, and confirm with FSR and M. Dhanji payment of same (.1).	KDM	\$525.00	1.10	\$577.50
08/19/2023	Rasco - Review and analyze email from opposing counsel regarding mediation	RML	\$525.00	0.10	\$52.50
08/20/2023	Review and analyze revisions to rental agreement and email exchange with J. Jammaron regarding same, and draft email to Property Manager regarding same (0.2); review and revise proposed LEAF settlement agreement (0.3).	RML	\$525.00	0.50	\$262.50
08/20/2023	Jauregui - Review and revise draft case management report.	RML	\$525.00	0.20	\$105.00
08/21/2023	Rasco - Work on mediation strategy.	RML	\$525.00	0.10	\$52.50
08/21/2023	Jauregui - Work on litigation strategy and revise portion of joint case management report (0.2); email exchange with opposing counsel (0.1); work on mediation (0.1).	RML	\$525.00	0.40	\$210.00
08/21/2023	Review of D&O and property proposal to provide summary of same (.9); telephone call with D. Baptista to discuss policies to be bounded (.1); email exchange with T. Rementeria and Danilo Baptista to discuss policy (.3); telephone call and email exchanges with T. Rementeria to discuss clarification on potential policies (.3); internal discussion with K. Murena on insurance options (.1); email exchange with Judge Gersten discussing proposal of insurance and summary of proposal (.3); email exchanges with AutoNation and Ally Bank to obtain status on sale and direction on unwrapping of vehicles (.2); email exchange with adjuster on Glazer matter to obtain status update (.1) email exchange with attorney Charlie of Kubicki Draper to follow-up on my question of status of case (.1).	AP	\$325.00	2.40	\$780.00
08/21/2023	Review and analyze email from Property Manager regarding insurance.	RML	\$525.00	0.20	\$105.00
08/21/2023	Work on mediation and litigation strategy.	RML	\$525.00	0.10	\$52.50
08/21/2023	Email exchange with two homeowners to provide them update on missing payments (.1); email exchange with Veritex Bank to follow-up on information and turnover of accounts (.1).	AP	\$325.00	0.20	\$65.00
08/21/2023	Jauregui - Review edited case management report (.2); work on schedule of case events with other malpractice actions (.2); draft case management schedule with earlier trial date (.2).	CP	\$275.00	0.60	\$165.00

08/21/2023	Emails and telephone conferences with Edwin Cruz regarding settlement discussions; review and finalize replies to Defendants' affirmative defenses.	TAC	\$525.00	1.00	\$525.00
08/21/2023	Continue working with A. Pavon on analyzing and comparing proposals for D&O, property, wind buy-back insurance policies and provide further input for sending summary of same and recommendation to Receiver, review same, discuss with R. Landy, and emails with Receiver regarding same (.4); emails and telephone call with insurance agent regarding same, whether coverages can be modified after policies are bound, and requirements for binding policies, telephone call with A. Pavon regarding same, and coordinate following up with Receiver regarding policy options to bind (.3); email from Receiver confirming the insurance policies to bind, emails with A. Pavon regarding same, and send email to insurance agent regarding same and requesting confirmation of binding policies (.1); review Notices of Filing by the Ceperos in the main bankruptcy case and discuss with team members (.2); confirm filing of Notices of Appearance in various bankruptcy cases in which Association is creditor, review Notice from Clerk's office regarding one filing, and coordinate resolving issue (.2); emails with A. Pavon and AutoNation regarding the proposed sale of certain Association vehicles and follow up on same (.1); emails with A. Pavon and adjuster for one personal injury claim regarding the information and documents he requested and follow up on status of investigation (.1); emails with A. Pavon and insurance counsel for Association regarding the status of personal injury action against Association and discuss with team (.1).	KDM	\$525.00	1.50	\$787.50
08/21/2023	Pcard signature and approving operating expenses on AVID (.6); emails regarding D&O insurance (.2).	MME	\$550.00	0.80	\$440.00
08/22/2023	Cepero - Review and analyze email from opposing counsel regarding order on motion to dismiss and revisions to same, and draft response (0.2); work on strategy for hearing on motion for relief from stay and review and analyze related documents from Bankruptcy case (0.5); draft filing for Court (0.2).	RML	\$525.00	0.90	\$472.50
08/22/2023	Telephone call with C. Kondla regarding status of Lujan v Hammocks case and his need for more information to assess demand (.1); email exchanges with M. Brito regarding Lujan v Hammocks case, providing by laws, and relevant section (.3); review and analysis of initial evaluation of Lujan claim prepared by Kubicki Draper and Demand Letter sent by Lujan's counsel (.6); email exchange with M. Vazquez to obtain information on M. Lujan's property (.1); public records search of M. Lujan property to determine common area (.2).	AP	\$325.00	1.30	\$422.50
08/22/2023	Email exchange with Ally Bank and Auto Nation discussing sale of vehicles.	AP	\$325.00	0.10	\$32.50
08/22/2023	Alfaro - Work on mediation strategy and email exchange with opposing counsel regarding same.	RML	\$525.00	0.10	\$52.50
08/22/2023	Draft report on Lujan v Hammocks with analysis of claim, liability, and potential exposure to the Association.	AP	\$325.00	1.20	\$390.00

08/22/2023	Rasco - Continue drafting responses to interrogatories.	CP	\$275.00	0.80	\$220.00
08/22/2023	Alfaro - Review and revise response to motion to dismiss.	RML	\$525.00	0.90	\$472.50
08/22/2023	Emails and telephone conferences with Edwin Cruz regarding settlement discussions; prepare letter to Edwin Cruz confirming settlement and providing payment instructions; review email from Edwin Cruz regarding settlement.	TAC	\$525.00	0.60	\$315.00
08/22/2023	Email from Receiver confirming option for insurance policies, emails with insurance agent regarding binding D&O, property, and wind buy-back insurance policies, and further discuss with A. Pavon (.1); emails and telephone call with counsel for the Ceperos regarding request for Status Conference in light of District Court's Amended Judgment, issues at possible evidentiary hearing, possible mediation, and related matters, prepare and send email to Receiver and E. Thompson regarding same, and emails regarding scheduling call to discuss same (.6); review letter from Ceperos's counsel to Bankruptcy Court regarding Amended Judgment and request for Status Conference (.1); review A. Danton's Report of Compliance regarding payments under Chapter 13 Plan (.1); email from insurance counsel for Association providing evaluation of Lujan personal injury claim and demand and recommending proposal for settlement, review analysis, emails with A. Pavon regarding same, and coordinate sending summary to Receiver and requesting input (.3); review Case Management Order in that action, email from Lujan's counsel regarding same, and discuss certain deadlines with A. Pavon (.2); emails with insurance counsel and A. Pavon regarding additional information and records requested for purposes of defending against claim (.1); review Notice of Hearing on Ceperos's Motion to lift stay to permit filing action against Association, emails and discuss with R. Landy same, dismissal of their original action, certain arguments raised by Ceperos in Motion, and Court filings undermining those arguments, and gather and send same to R. Landy with explanation (.4); review filing in Chapter 11 bankruptcy case of homeowner (.1); emails with insurance agent and Receiver regarding binder for D&O, property, and wind buy-back policy renewals and the Receiver's execution of same and review executed insurance documents and financing agreement (.2); review further emails with AutoNation regarding the proposed sale of certain Association vehicles (.1).	KDM	\$525.00	2.30	\$1,207.50
08/22/2023	Reviewing financials and approving operational invoices and emails regarding same (.6); telephone calls regarding resolution of D & O claim and update receiver regarding same (.8).	MME	\$550.00	1.40	\$770.00
08/23/2023	Review and revise motion for order to show cause as to Sports Surfaces (0.2); work on recovery of association vehicle and email exchange with Receiver regarding same (0.3); review and analyze email from Warehouse landlord (0.1); work on completion of Leaf settlement (0.3).	RML	\$525.00	0.90	\$472.50

08/23/2023	Draft and revise report on Lujan v Hammocks with continued analysis of claim, adding background on claimed injury, and research found on the common areas subject to the suit (1.6); email exchange with M. Brito regarding same (.1).	AP	\$325.00	1.70	\$552.50
08/23/2023	Rasco - Complete draft interrogatory responses (1.7); correspondence with opposing counsel regarding agreed extension (.2).	CP	\$275.00	1.90	\$522.50
08/23/2023	Email exchanges with M. Vazquez and B. Santovenia regarding status of sales of vehicles (.1); review and analysis of spreadsheet provided with payments from previous law firm into outstanding ledgers (.2); email exchange with M. Barad regarding outstanding ledgers and resolution of same (.1); prepare responses and review and analysis of dockets for five bankruptcy proceedings involving the Hammocks properties; prepare chart of same (.5); prepare status of vehicle sales to be presented to Judge Gersten (.3); email exchange with M. Vazquez regarding bankruptcy hammocks cases to obtain correct balances (.2).	AP	\$325.00	1.40	\$455.00
08/23/2023	Alfaro - Draft second draft of response to motion to dismiss.	CP	\$275.00	3.70	\$1,017.50
08/23/2023	Rasco - Review and analyze email from opposing counsel regarding discovery and mediation.	RML	\$525.00	0.10	\$52.50
08/23/2023	Galceran - Research value of impounded vehicle and edit correspondence to Receiver regarding recommendation (.4); assess correspondence from Receiver regarding next steps (.1).	CP	\$275.00	0.50	\$137.50
08/23/2023	Emails with A. Pavon and insurance counsel for Association in personal injury action against Association regarding investigation of facts and the plaintiff and the response to plaintiff's demand and follow up on same (.1); further emails with team regarding notices of appearance filed and to be filed in bankruptcy cases in which Association in creditor, review and revise one Notice, follow up on filing of same, and provide direction deadlines for creditors in those cases (.2); review court filing from bankruptcy case of another homeowner (.1); telephone call with Receiver and E. Thompson regarding strategy for remand to Bankruptcy Court pursuant to Amended Judgment from District Court, possible mediation, and related matters (.3); review and revise correspondence to debtor's counsel regarding debtor's failure to list debt to Association and requesting agreement to file claim and amend bankruptcy schedules, discuss with A. Pavon, and coordinate confirming debts of this and other creditors as of petition dates (.2).	KDM	\$525.00	0.90	\$472.50
08/23/2023	Emails regarding status, strategy and scheduling issues in lawsuits against former Association lawyers.	MME	\$550.00	0.40	\$220.00
08/24/2023	Rasco - Email exchange with Napoleon's counsel regarding mediation (0.1); review and revise portions of answers to interrogatories (0.3).	RML	\$525.00	0.40	\$210.00
08/24/2023	Alfaro - Review and revise response to motion to dismiss.	RML	\$525.00	0.40	\$210.00

08/24/2023	Work on strategy for motion for order to show cause against Sport Surfaces and draft email to client regarding same (0.2); draft email to counsel or Leaf and work on settlement agreement obligations (0.1); email exchange with Property Manager regarding clubhouse rental (0.1).	RML	\$525.00	0.40	\$210.00
08/24/2023	Review Order extending deadline in Chapter 11 case of homeowner and discuss with team effect on Association's claim in bankruptcy case (.1); receive notification of entry of Amended Judgment in the Ceperos Bankruptcy case, review same, and discuss with team (.2); email from Ceperos's counsel withdrawing request for Status Conference in light of remaining briefing on their appeal of Bankruptcy Court's denial of attorneys' fees and email from the Judge's chambers regarding same and instructing counsel to file motions instead of sending letters (.1); review Ceperos's Reply Brief in attorneys' fees appeal and discuss with team (.4); emails with FSR regarding the status of Popular Bank's sending the balance in the homeowner payment account to the Association, discuss with M. Dhanji, review prior emails to Bank and form submitted for transfer, and emails to Popular Bank regarding same (.3); emails with insurance counsel for Association and A. Pavon regarding status of investigation and settlement demand and response in personal injury action against Association (.1).	KDM	\$525.00	1.20	\$630.00
08/25/2023	Rasco - Apply edits and draft second draft of response to initial interrogatories (.6); conference call with opposing counsel regarding exchange of electronic discovery (.4).	CP	\$275.00	1.00	\$275.00
08/25/2023	Email exchange with Popular Bank regarding turnover of funds to CNB (.1); telephone call with Popular Bank providing additional direction for funds (.2); email exchange with M.Vazquez regarding CNB bank account (.1); email correspondence with Judge Gersten regarding direction on vehicle and provide vehicle update (.2).	AP	\$325.00	0.60	\$195.00
08/25/2023	Alfaro - Apply edits and draft third draft of response to motion to dismiss.	CP	\$275.00	0.70	\$192.50
08/25/2023	Jauregui - Work on finalizing case management report and proposed order (.3); preliminary assessment of Defendant's motion to dismiss (.3); apply further edits to report regarding Dependents' objections (.2); begin outlining and drafting response to motion to dismiss (2.1).	CP	\$275.00	2.90	\$797.50
08/25/2023	Hermida - Assess Defendant's joint response to motion to transfer.	CP	\$275.00	0.30	\$82.50
08/25/2023	Review and analyze Defendants' proposed changes to joint case management report, and email exchange with opposing counsel regarding same.	RML	\$525.00	0.50	\$262.50
08/25/2023	Alfaro - Formulate litigation strategy related to liability of all three defendants.	RML	\$525.00	0.30	\$157.50
08/25/2023	Rasco - Call with opposing counsel regarding discovery and mediation (0.5); work on litigation strategy (0.4).	RML	\$525.00	0.90	\$472.50



08/25/2023	Multiple emails with FSR, A. Pavon, M. Dhanji, the Receiver, and Popular Bank regarding the form to be completed and signed by the Receiver to close accounts and transfer balances to Association's account, discuss with team, the balance in each account, and related matters, and provide input regarding resolving issues (.3); further emails with A. Pavon and team regarding approval required by Popular Bank and receive update regarding same (.1); emails with A. Pavon and Receiver regarding the status of sale of remaining vehicles, need to unwrap vehicles, and resolving issues with Ally Bank and provide input regarding same (.2).	KDM	\$525.00	0.60	\$315.00
08/25/2023	Reviewing and approving operating invoices (.4); reviewing issue regarding insurance and responding (.3); update regarding D & O settlement (.2).	MME	\$550.00	0.90	\$495.00
08/25/2023	[Trujillo Bankruptcy] Emails to and from K. Murena regarding motion to waive deduction (.2); register for hearing on same (.1).	rs	\$100.00	0.30	\$30.00
08/26/2023	Jauregui - Review and analyze Motion to Dismiss.	RML	\$525.00	0.20	\$105.00
08/26/2023	Hermida - Review and analyze Defendants' response to motion to transfer.	RML	\$525.00	0.20	\$105.00
08/28/2023	Klock - Review and revise responses to interrogatories.	RML	\$525.00	0.30	\$157.50
08/28/2023	Alfaro - Review and revise portions of response to motion to dismiss.	RML	\$525.00	0.50	\$262.50
08/28/2023	Review and analyze email from Eric Thompson and draft email to State Attorney regarding same (0.1); work on investigation strategy (0.2).	RML	\$525.00	0.30	\$157.50
08/28/2023	Jauregui - Review and analyze opposing counsel's revisions to joint case management report and complete same (0.3); confer with Receiver regarding same (0.1); work on litigation strategy (0.1).	RML	\$525.00	0.50	\$262.50
08/28/2023	Cepero - Review and analyze proposed order on motion to dismiss and draft revisions.	RML	\$525.00	0.20	\$105.00
08/28/2023	Rasco - Review and revise response to interrogatories.	RML	\$525.00	0.40	\$210.00
08/28/2023	Jauregui - Assess differences in draft proposed status reports (.2); assess agreed order (.1).	CP	\$275.00	0.30	\$82.50
08/28/2023	Emails with E. Thompson regarding signed account closure request form, review same, coordinate sending to Popular Bank, and emails with Popular Bank regarding same and the timing of closing accounts and sending account balances to Association (.2); emails with A. Pavon regarding upcoming hearing in bankruptcy case of homeowner and attendance at same (.1); email from counsel for crime policy carrier forwarding letter requesting additional information, records, and interviews with various employees and board members, emails with A. Pavon regarding same, gathering records and sending to Receiver, and coordinate scheduling call with Receiver and counsel to further discuss (.4); emails with FSR regarding the balances to be transferred from closed accounts at Popular Bank to the Association and coordinate following up on the timing of same (.1).	KDM	\$525.00	0.80	\$420.00

08/28/2023	[Cepero Bankruptcy] Review and analyze appellees' motion to alter or amend judgment in first appeal.	rs	\$100.00	0.30	\$30.00
08/29/2023	Receipt and analysis of letter from Philadelphia Indemnity Insurance Corporation and provide summary of same (.6); email exchange with Judge Gersten to discuss same (.1); email exchange with M. Vazquez regarding sale of vehicles (.1).	AP	\$325.00	0.80	\$260.00
08/29/2023	Attend hearing in re Rosa Flor Trujillo.	AP	\$325.00	1.90	\$617.50
08/29/2023	Rasco - Finalize responses to interrogatories.	CP	\$275.00	0.30	\$82.50
08/29/2023	Danton - Conference with M. Davis regarding forensic accounting (.4); begin DISCO search locating requested documents for State Attorney regarding additional suspected fraudulent vendors (1.7).	CP	\$275.00	2.10	\$577.50
08/29/2023	Email exchange with J. Grimaldo regarding fees and waiver of same.	AP	\$325.00	0.10	\$32.50
08/29/2023	Email exchange with counsel for Leaf regarding agreement terms.	RML	\$525.00	0.10	\$52.50
08/29/2023	Conference with forensic accountant regarding tracing analysis.	RML	\$525.00	0.50	\$262.50
08/29/2023	Rasco - Review and revise responses to interrogatories.	RML	\$525.00	0.40	\$210.00
08/29/2023	Work on litigation strategy concerning settlements (0.2); work on settlement agreement related to non-released claims from D&O settlement agreement (0.5).	RML	\$525.00	0.70	\$367.50
08/29/2023	Email to and from Edwin Cruz regarding proposed release; review and edit proposed release.	TAC	\$525.00	1.00	\$525.00
08/29/2023	Danton - Begin locating requested documents for State Attorney regarding additional suspected fraudulent vendors.	CP	\$275.00	1.70	\$467.50
08/29/2023	Discuss with M. Damian the latest letter from counsel for crime policy carrier requesting additional information, records and interviews for purposes of Association's claims, emails and further discuss with A. Pavon gathering requested records and scheduling call with Receiver, and emails with Receiver and counsel regarding same (.3); discuss with M. Damian the settlement with directors and offices and D&O insurance carrier, revisions to make to the release, and the proof of damages upon which settlement was based and review records regarding same for purposes of crime insurance policy (.5); gather and provide to M. Damian information regarding crime policy and claim for purposes of settlement of D&O claims (.2); emails with A. Pavon and Ally Bank regarding possibility of the Bank selling the vehicles and remitting the surplus to the Association (.1); emails with Receiver, M. Dhanji, and Popular Bank regarding the status of closing accounts and sending account balance to the Association (.1); review Ceperos's Motion to Alter or Amend Amended Judgment and emails with Receiver and E. Thompson regarding same and arguments in response (.3).	KDM	\$525.00	1.50	\$787.50

08/30/2023	Cepero - Prepare for hearing on motion for relief from court order (0.3); attend hearing on Ceperos' motion for relief from court order (0.5); review and revise proposed order (0.1).	RML	\$525.00	0.90	\$472.50
08/30/2023	Jaurigui - Work on litigation strategy.	RML	\$525.00	0.20	\$105.00
08/30/2023	Rasco - Email exchange with Receiver regarding interrogatory responses and complete same.	RML	\$525.00	0.20	\$105.00
08/30/2023	Revising settlement agreement emails with receiver and co counsel regarding same concerning release (9); revising motion and order on settlement approval and discuss same with co-counsel (.5).	MME	\$550.00	1.40	\$770.00
08/30/2023	Jauregui - Continue drafting response to motion to dismiss.	CP	\$275.00	3.30	\$907.50
08/30/2023	Danton - Draft letter regarding Miami-Dade permitting.	CP	\$275.00	0.30	\$82.50
08/30/2023	Emails with Popular Bank regarding signature needed on form to close accounts and transfer account balances to the Association, emails with Receiver and team regarding same, send form to Receiver, emails with Receiver regarding method of execution, and further emails with Bank regarding same (.2); emails and discuss with A. Pavon strategy for responding to latest letter from counsel for crime insurance carrier, produced the latest requested documents, preparation of complaint, and scheduling call with Receiver to discuss same (.4); emails and telephone call with Receiver regarding same (.3); emails with A. Pavon and counsel for Advisory Board regarding same and preparation of complaint, discuss with M. Damian and A. Pavon same and evidence of theft (.3); further emails with Receiver regarding preparation of response to Ceperos's Motion to Alter or Amend Amended Judgment and strategize regarding same (.1); discuss with R. Landy and M. Damian the Court's ruling on the Ceperos's Motion for Stay Relief to proceed with action against Association and strategize for purposes of defending that action (.2).	KDM	\$525.00	1.50	\$787.50
08/31/2023	Garcia and Guirola - Review and analyze demand email regarding metal roof, email exchange with Receiver regarding same, and draft response.	RML	\$525.00	0.20	\$105.00
08/31/2023	Jauregui - Additional research regarding pleading malpractice actions.	CP	\$275.00	0.70	\$192.50
08/31/2023	Email exchanges with M. Frank regarding Navarro bankruptcy and request for payment for overdue association fees (.2); email exchange with P regarding Navarro bankruptcy and request for payment for overdue association fees (.1); internal discussion with K. Murena and P. Baloyra to obtain strategy on lawsuit against Phil. Insurance Company (.5).	AP	\$325.00	0.80	\$260.00
08/31/2023	Prepare response letter to PIIC providing information on documents requested and demand to provide insurance proceeds.	AP	\$325.00	1.10	\$357.50
08/31/2023	Email exchange with H. Lopez regarding stolen vehicles and titles.	AP	\$325.00	0.10	\$32.50

08/31/2023	Approving invoices and emails regarding same (.3); telephone calls regarding resolution of D & O claim (0.2); revising settlement agreement and update receiver and co counsel regarding same (.9).	MME	\$550.00	1.40	\$770.00
08/31/2023	Review Court filings, notices, and orders in various bankruptcy case in which Association is a creditor, discuss with A. Pavon and emails with team regarding same, deadlines in the cases, monitoring the cases, whether the Association is listed as creditor in the Schedules, contacting debtors' counsel regarding same and whether they will pay debts to Association, and attending hearing in one case (.3); review emails with counsel for certain debtors regarding the failure to list Association and whether debtors will pay debts to Association (.1); review Order granting Ceperos's Motion for Stay Relief and further discuss with team same and strategy for the action filed by the Ceperos (.2); strategize with P. Baloyra and A. Pavon regarding preparation of Complaint against crime policy carrier and provide input regarding same (.4); emails with A. Pavon regarding preparation of letter responding to the latest letter from the crime policy carrier's counsel requesting additional documents and interviews with third parties, review draft letter, and coordinate revisions (.3).	KDM	\$525.00	1.30	\$682.50
08/31/2023	Call with M. Ernst regarding potential witnesses (0.2); review and analyze emails regarding ACC roof matters (0.1); review and analyze email from owner regarding ACC dispute at 15585 SW 112 Way and draft response (0.2).	RML	\$525.00	0.50	\$262.50
08/31/2023	[Martinez] Review court file (.7); email to K. Murena regarding same (.1).	rs	\$100.00	0.80	\$80.00
08/31/2023	[Trujillo] Review court file (.7); email to K. Murena regarding same (.1).	rs	\$100.00	0.80	\$80.00
08/31/2023	[Arboleda] Review court file (.7); email to K. Murena regarding same (.1).	rs	\$100.00	0.80	\$80.00
09/01/2023	Jauregui - Prepare for Case Management Conference (0.3); attend Initial Case Management Conference (0.5).	RML	\$525.00	0.80	\$420.00
09/01/2023	Negotiating final language on D&O settlement, discuss same with co-counsel and multiple e-mails and texts regarding same.	MME	\$550.00	1.20	\$660.00
09/01/2023	Jauregui - Draft case management schedule contemplating revised trial dates.	CP	\$275.00	0.30	\$82.50
09/01/2023	Emails with K. Murena regarding drafting of complaint against insurer for failure to pay on policy.	PB	\$400.00	0.20	\$80.00
09/03/2023	Emails with Receiver's office and Receiver regarding the status of various bankruptcy proceedings of debtors in litigation with the Association and emails with A. Pavon regarding preparation of status report for the Receiver.	KDM	\$525.00	0.20	\$105.00
09/04/2023	Rasco - Review and analyze Order Setting Initial Case Management Conference And To Prepare A Mandatory Case Management Report (0.1); review and analyze Order Setting Trial And Final Pre-Trial Conference (0.2); draft email to opposing counsel regarding mediation (0.1).	RML	\$525.00	0.40	\$210.00

09/05/2023	Cepero - Work on litigation strategy and motion to stay.	RML	\$525.00	0.10	\$52.50
09/05/2023	Work on investigation regarding Santiago Legal (0.1); call with Betty Gonzalez regarding ACC dispute for 15964 (0.4); review and revise letter regarding permit application and draft email to Receiver regarding same (0.1).	RML	\$525.00	0.60	\$315.00
09/05/2023	Alfaro - Review and analyze order setting initial case management conference and call with opposing counsel regarding joint case management report (0.2); review and revise case management report (0.2); draft email to Receiver regarding litigation strategy and CMC (0.1).	RML	\$525.00	0.50	\$262.50
09/05/2023	Rasco - Begin to prepare for hearing on motion to dismiss.	RML	\$525.00	0.10	\$52.50
09/05/2023	Providing an update on the Bankruptcy Cases, outlining the status and relevant details of ongoing case, including the latest filings, pending deadlines, hearings, outstanding debts, and future proceedings to Judge Gersten; review of dockets to prepare same.	AP	\$325.00	1.20	\$390.00
09/05/2023	Hermida - Prepare for hearing on motion to transfer.	RML	\$525.00	0.40	\$210.00
09/05/2023	Draft proof of claims in Rosa Flor Trujillo bankruptcy claim (.5); email exchanges with P. Cordero regarding bankruptcy plan (.2); telephone call with M. Vazquez regarding association fees and update on vehicles (.1).	AP	\$325.00	0.80	\$260.00
09/05/2023	Alfaro - Call with S. Demos regarding case management conference and report (.1); draft case management report and proposed schedule (1.4).	CP	\$275.00	1.50	\$412.50
09/05/2023	Jauregui - Call with S. Demos regarding motion to dismiss (.1); draft motion for extension of time to respond to motion to dismiss (.2); assess case management order regarding conflicting deadlines (.3).	CP	\$275.00	0.60	\$165.00
09/05/2023	Responding to questions from FSR and e-mails with forensic accountants (.4); follow-up on D&O settlement with counsel for carrier (.3).	MME	\$550.00	0.70	\$385.00
09/05/2023	Cepero - Review case file and draft Motion to Stay.	GJ	\$150.00	1.50	\$225.00
09/05/2023	Discuss with A. Pavon preparing and filing proof of claim in one Chapter 13 bankruptcy case of homeowner, review, approve and sign Proof of Claim, and coordinate filing (.2); review Order rescheduling confirmation hearing in Chapter 13 bankruptcy case and resetting deadlines and discuss with team (.1); work with A. Pavon on confirming the status of various bankruptcy cases, reviewing court filings and orders, Bankruptcy Schedules, and plans of reorganization, determining proposed treatment of Association, communications with Debtors counsel and Chapter 13 Trustee regarding same and other matters, coordinate and provide input for preparation of report to the Receiver, and email from Receiver's office regarding same (.6).	KDM	\$525.00	0.90	\$472.50
09/05/2023	[Trujillo Bankruptcy] [No charge] Finalize and process proof of claim (.2); register claim (.1); review court file (.2); review and analyze order continuing confirmation hearing (.2); emails to and from K. Murena regarding same (.1).	rs		0.80	\$0.00

09/05/2023	Review materials and commence drafting complaint for breach of contract against crime policy insurer.	PB	\$400.00	2.50	\$1,000.00
09/06/2023	Hermida - Prepare for and attend motion to transfer (0.3); work on litigation strategy and hearing on motion to amend (0.1).	RML	\$525.00	0.40	\$210.00
09/06/2023	Email exchange with Receiver regarding permit issue and review and revise letter (0.1); review and analyze email from Marisley Ginarte, draft response, and draft email to Property Manager regarding same (0.1).	RML	\$525.00	0.20	\$105.00
09/06/2023	Telephone call with Sean Cordero regarding bankruptcy status of R. Trujillo and direct payments to Hammocks (.2); email exchanges with Sean Cordero regarding details of bankruptcy plan of R. Trujillo (.2).	AP	\$325.00	0.40	\$130.00
09/06/2023	Alfaro - Review and analyze Defendants revisions to joint case management report and work on related strategy.	RML	\$525.00	0.40	\$210.00
09/06/2023	Rasco - Prepare for hearing on motion to dismiss.	RML	\$525.00	0.90	\$472.50
09/06/2023	Danton - Finalize letter regarding permitting authority.	CP	\$275.00	0.20	\$55.00
09/06/2023	Review and analyze email from counsel for Leaf and review and analyze proposed revised agreement.	RML	\$525.00	0.20	\$105.00
09/06/2023	Telephone calls and emails toward execution of settlement in D&O case (.4); finalize revisions to motion to approve and consulting regarding same (.7); telephone call with Jesmany Jamarron regarding status of various matters (.6); receipt of Order and circulate same to obtain payment (.2).	MME	\$550.00	1.90	\$1,045.00
09/06/2023	Review Agreed Order approving settlement with former directors and officers and discuss with M. Damian same (.1); review Chapter 13 Plan of homeowner and emails with A. Pavon regarding same and proposed treatment of Association's claim and homeowner's intention to pay Association outside the Plan (.2).	KDM	\$525.00	0.30	\$157.50
09/06/2023	[Trujillo Bankruptcy] [No charge] Telephone conference with bankruptcy clerk regarding order continuing confirmation hearing (.2); email to K. Murena regarding same (.1).	rs		0.30	\$0.00
09/07/2023	Rasco - Prepare for hearing on Defendants' motions to dismiss (1.3); attend hearing on hearing on Defendants' motions to dismiss (0.6); review and revise proposed order on motion to dismiss (0.1); work on litigation strategy (0.2); review and analyze forensic accountant schedules and prepare damages disclosure for opposing counsel (0.3).	RML	\$525.00	2.50	\$1,312.50
09/07/2023	Alfaro - Prepare for case management conferee (0.2); attend case management conference (0.3); review and analyze order setting new case management deadline and case management conference (0.1); review and analyze order of adherence to CBL procedures (0.1); work on litigation strategy (0.1); work on hearing on motion to dismiss (0.1).	RML	\$525.00	0.90	\$472.50
09/07/2023	Jaurigui - Review and revise response to motion to dismiss and review and analyze research regarding same.	RML	\$525.00	0.90	\$472.50
09/07/2023	Alfaro - Attend case management conference.	CP	\$275.00	0.20	\$55.00

09/07/2023	[No charge] Rasco - Attend hearing on Defendants' motion to dismiss (.7); draft proposed order granting motion in part and denying in part (.3).	CP		1.00	\$0.00
09/07/2023	Email exchange with M. Vazquez to obtain ledger of homeowner in bankruptcy (.1); conduct comprehensive review of the F. Navas bankruptcy case, including a thorough examination of the docket, analysis of the bankruptcy plan, assessment of discharge status, and evaluation of any relevant motions to dismiss, to determine the appropriate course of action for upcoming foreclosure matter (.9); review of N. Navas foreclosure case to determine status and parties (.2); prepare internal correspondence to K. Murena to summarize findings of same and discuss potential strategy (.2); email exchange with Ally Bank regarding sale of vehicles (.1); email exchange with Judge Gersten regarding instruction on unwrapping vehicles for sale (.1).	AP	\$325.00	1.60	\$520.00
09/07/2023	Review Notice of Continued Confirmation hearing and hearing on Trustee's Objection to Claimed Exemptions and discuss attending hearing with team (.1); emails with Receiver's office regarding preparation for upcoming trial in foreclosure case involving homeowner, prior bankruptcy case and related issues, emails with A. Pavon regarding same, review bankruptcy Plan and docket, and provide direction regarding further investigation into same and responding to Receiver's office (.3).	KDM	\$525.00	0.40	\$210.00
09/07/2023	Continue drafting breach of contract complaint against crime policy insurer.	PB	\$400.00	2.00	\$800.00
09/08/2023	Rasco - Review and analyze documents and schedules from forensic accountant and draft email to opposing counsel regarding settlement communications (0.3); review and analyze Court' s order on motion to dismiss (0.1); calls with forensic accountant (0.5); review, analyze, and formulate damage analysis (0.2); work on expert witness strategy and call with potential expert (0.2); research regarding standard of care (0.2).	RML	\$525.00	1.50	\$787.50
09/08/2023	Hermida - Email exchange with opposing counsel regarding motion to dismiss.	RML	\$525.00	0.20	\$105.00
09/08/2023	Reviewing revised budget and emails regarding same (.3); reviewing invoices in avid and approving same, review of financials and responding to FSR regarding cash management issues (.8).	MME	\$550.00	1.10	\$605.00

09/08/2023	Emails with insurance agent regarding deadline and plan for renewing or replacing general liability policy, emails with Receiver regarding same, discuss with team, and provide direction to insurance agent (.2); emails with A. Pavon and Ally Bank regarding possibility of Ally Bank repo department selling vehicles subject to liens sold a auction with surplus remitted to Association (.1); email from P. Baloyra forwarding draft Complaint against crime policy carrier and begin reviewing and revising same (.3); emails with A. Pavon and Receiver regarding having vehicles unwrapped so they can be sold to AutoNation and provide further input regarding same (.1); further emails with Receiver regarding obtaining proposals for replacement of general liability policy and issues with same given amounts paid on claims and discuss with team (.1).	KDM	\$525.00	0.80	\$420.00
09/08/2023	[Martinez Bankruptcy] [No charge] Review and analyze notice of continued confirmation hearing and objections (.1); review Trustee's notice of deficiencies (.1).	rs		0.20	\$0.00
09/08/2023	Finalize draft complaint and email to K. Murena regarding same.	PB	\$400.00	3.30	\$1,320.00
09/10/2023	Email from E. Thompson regarding the draft Response to the Ceperos's Motion to Altern or Amend the District Court's Amended Judgment, review and revise same, review District Court's Order vacating initial Judgment and other Orders entered in the Appeal, and forward revised draft to E. Thompson regarding comments regarding same (1.5).	KDM	\$525.00	1.50	\$787.50
09/11/2023	Email exchange with Judge Gersten to discuss direction on Ally Bank repossession of vehicles (.1); email exchange with M. Vazquez regarding direction to unwrap vehicles (.1); email exchange with M. Vazquez regarding payment details (.1); email exchanges with Veritex Bank concerning Hammocks Bank Accounts (.2).	AP	\$325.00	0.50	\$162.50
09/11/2023	Rasco - Work on expert witness strategy and draft email to Receiver regarding same.	RML	\$525.00	0.20	\$105.00
09/11/2023	Work on further claim strategy (0.2); review and revise proposed amendment to Leaf agreement (0.3); review and analyze email from Matt Hartley and draft email to forensic accountant (0.1).	RML	\$525.00	0.60	\$315.00
09/11/2023	Hermida - Email exchange with opposing counsel.	RML	\$525.00	0.10	\$52.50
09/11/2023	Reviewing budget with FSR, team and Receiver (1.0); meeting with Receiver regarding other pending issues (.3).	MME	\$550.00	1.30	\$715.00
09/11/2023	Danton - Review production from Santiago Legal.	CP	\$275.00	0.20	\$55.00



09/11/2023	Emails with Ally Bank and A. Pavon regarding having Bank sell vehicles and remit surplus to Association, estimated values and sale prices, and emails with Receiver and A. Pavon regarding same and amounts owed on the vehicles, discuss with A. Pavon, and further emails with Bank regarding same (.3); emails with team regarding upcoming hearing in Chapter 13 case of homeowner and coverage of same (.1); emails with A. Pavon regarding deadline to file proof of claim and upcoming confirmation hearing in bankruptcy case of homeowner and provide direction regarding preparation of proof of claim (.2); emails with A. Pavon and Veritext Community Bank regarding searching for accounts of Association and information and documents suggesting an account exists and review same (.2).	KDM	\$525.00	0.80	\$420.00
09/11/2023	[Navarro Bankruptcy] [No charge] Register for confirmation hearing (.2); email to and from K. Murena regarding same (.1).	rs		0.30	\$0.00
09/11/2023	Cepero - Draft Motion to stay.	GJ	\$150.00	1.20	\$180.00
09/12/2023	Jauregui - Finish second draft of response to motion to dismiss (2.5); review and assess additional case law regarding malpractice claims (.8).	CP	\$275.00	3.30	\$907.50
09/12/2023	Galceran - Correspondence with G. Galceran regarding car sale.	CP	\$275.00	0.20	\$55.00
09/12/2023	Email exchange with M. Vazquez to provide instruction on vehicle unwrapping and vendor (.1); email exchange with Judge Gersten providing balance of vehicles encumbered by Ally bank (.1); email echange with Ally Bank regarding repossession process (.1).	AP	\$325.00	0.30	\$97.50
09/12/2023	Danton - Conference with Receiver regarding additional lawsuits against fraudulent entities.	CP	\$275.00	0.30	\$82.50
09/12/2023	Rasco - Work on expert witness strategy (0.1); call with forensic account regarding damages (0.2); call with Todd Boyd regarding discovery, damage calculation, and settlement negotiations (0.5).	RML	\$525.00	0.80	\$420.00
09/12/2023	Email exchange and call with forensic accountant regarding insurance payments from SAO restitution (0.4); work on further claims strategy (0.3).	RML	\$525.00	0.70	\$367.50
09/12/2023	Hermida - Review and analyze email from opposing counsel regarding motion to dismiss and claim.	RML	\$525.00	0.10	\$52.50
09/12/2023	Cepero - Review and analyze Amended Complaint and work on related litigation strategy.	RML	\$525.00	0.20	\$105.00
09/12/2023	Jauregui - Review and revise response to motion to dismiss (1.1); review and analyze research regarding element of legal malpractice claim and FRCP 1.130 (0.5).	RML	\$525.00	1.60	\$840.00
09/12/2023	Reviewing forensic findings concerning certain fraudulent transfers and develop strategy regarding same to be recommended to Receiver.	MME	\$550.00	0.50	\$275.00

09/12/2023	Review Certificate of Compliance and Request for Confirmation of Chapter 13 Plan in bankruptcy case of homeowner and exchange emails with team regarding same and not filing proof of claim given debtor's failure to list Association as creditor and debtor's stated intention to pay outstanding balance (.2); review Notice of Deficiency for Confirmation of Chapter 13 Plan in another bankruptcy case of homeowner (.1); further emails with Ally Bank and A. Pavon regarding amounts owed on additional vehicles for purposes of determine whether to have Bank sell same, and further emails with Receiver and A. Pavon regarding same (.2).	KDM	\$525.00	0.50	\$262.50
09/12/2023	Jauregui - Research regarding case law in defendants draft motion.	GJ	\$150.00	2.70	\$405.00
09/13/2023	Email exchange with B. Santovenia to discuss auto repairs (.1); email exchange with Judge Gersten with update and summary of amounts due and potential for profits to the Association (.2); telephone calls and correspondence with M. Vazquez regarding Axiom (.3); telephone call with accountant S. Barez to discuss missing bank statements and documents needed for Complaint (.3); email exchanges with E. Thompson to discuss Axiom and to obtain direction on ledgers (.1); edit, revise and finalize report on Lujan v Hammocks (.4); email exchange with Judge Gersten to provide report and update on Lujan v Hammocks (.1).	AP	\$325.00	1.50	\$487.50
09/13/2023	Discuss with A. Pavon update from counsel for Association in one personal injury action, review letter from counsel, provide direction to A. Pavon regarding providing report to Receiver, and review email to Receiver regarding same (.2); review Ceperos's Reply in support of Motion to alter or amend Amended Judgment from District Court and discuss with team (.2); emails with A. Pavon and E. Thompson regarding issue with Axiom's collection of past due amounts from homeowners and the Association's ledger and ensuring correct amounts are collected and discuss with team (.2); emails with A. Pavon and Receiver regarding value and amounts owed on certain vehicles, option to have Ally Bank sell them, and exploring sale through online sellers and auction companies and provide input regarding same (.2); emails with Receiver and M. Damian regarding Notification of Coverage for flood policies and the status of paying all insurance premiums and review Notification (.1); email from FSR regarding issues related to Certificate of Title and safe harbor statute in foreclosure action against homeowner, and review communications with title company regarding same (.2).	KDM	\$525.00	1.10	\$577.50
09/13/2023	Ceperos - Review Amended Complaint (A.C); draft email regarding viability of motion to dismiss.	GJ	\$150.00	0.80	\$120.00
09/14/2023	Draft report on sale of vehicles (.2); email exchange with C.Tickner regarding vehicles for sale (.1); telephone call with M. Vazquez regarding potential Carmax sale (.1).	AP	\$325.00	0.40	\$130.00
09/14/2023	Jauregui - Begin draft of amended complaint.	CP	\$275.00	0.50	\$137.50
09/14/2023	Reviewing financials and approving AVID operating invoices.	MME	\$550.00	0.70	\$385.00

09/14/2023	Provide further input regarding sale of vehicles and emails with A. Pavon and staff regarding same (.2); review recent Court filings in two bankruptcy cases of homeowners including Sixth Amended Chapter 13 Plan and Notice of Continuation of Confirmation Hearing and payments under proposed plan and discuss with team (.2).	KDM	\$525.00	0.40	\$210.00
09/14/2023	[Navarro Bankruptcy] [No charge] Receipt and review of order continuing confirmation hearing.	rs		0.20	\$0.00
09/14/2023	Santiago Legal - Review produced documents; draft memorandum regarding documents and possible causes of action.	GJ	\$150.00	1.70	\$255.00
09/14/2023	Cepero - Draft Motion to Dismiss.	GJ	\$150.00	0.40	\$60.00
09/14/2023	Klock - Work on litigation strategy.	RML	\$525.00	0.10	\$52.50
09/14/2023	Alfaro - Email exchange with opposing counsel regarding joint case management report.	RML	\$525.00	0.10	\$52.50
09/15/2023	Alfaro - Work on case management conference strategy.	RML	\$525.00	0.10	\$52.50
09/15/2023	Jaurigui - Work on mediation strategy.	RML	\$525.00	0.10	\$52.50
09/15/2023	Follow up on status of sale of vehicles and provide input regarding same (.2); emails with E. Thompson and forensic accountant regarding the upcoming Association board meeting and preparing and providing report for meeting (.1).	KDM	\$525.00	0.30	\$157.50
09/15/2023	Sending information to Receiver to prepare for Advisory BOD meeting (.5); telephone call with Melissa Davis regarding status of forensic accounting and next steps for audit and taxes (.4).	MME	\$550.00	0.90	\$495.00
09/15/2023	Rasco - Work on drafting amended complaint.	CP	\$275.00	0.50	\$137.50
09/18/2023	Email exchange with M. Vazquez regarding safe harbor provision for property sale (.1); Research regarding Florida Statutes 720.3085 and 718.116 provisions on lender obligations for HOA and condominium association fees following foreclosure (.6); email with C. Tickner regarding vehicles sales (.1)	AP	\$325.00	0.80	\$260.00
09/18/2023	Telephone call with Receiver regarding status of various matters in preparation for Board meeting (.4); reviewing financial report and responding regarding homeowner access (.3).	MME	\$550.00	0.70	\$385.00
09/18/2023	Klock - Review and analyze email from opposing counsel and draft response (0.1); work on claims strategy and formulation of litigation plan (0.8).	RML	\$525.00	0.90	\$472.50
09/18/2023	Alfaro - Draft email response to opposing counsel regarding proposed trial scheduling dates and conferral in advance of CMC .	RML	\$525.00	0.20	\$105.00
09/18/2023	Email exchange with Receiver regarding ACC application appeal.	RML	\$525.00	0.20	\$105.00

09/18/2023	Emails with FSR and A. Pavon regarding bank's sale of property to new buyer and resolving issue related to amounts due to Safe Harbor and discuss with A. Pavon (.2); email from forensic accountant providing status report for purposes of upcoming Association Board meeting, review same, and email from E. Thompson regarding same (.2); email from First Insurance forwarding invoice for insurance premiums for two policies, email to M. Dhanji regarding same, and confirm payment is scheduled (.1).	KDM	\$525.00	0.50	\$262.50
09/19/2023	Email exchange with M. Vazquez regarding Regions Bank account (.1); review of file to determine Regions Bank account (.2); email exchange with C. Ticker regarding offer of vehicles (.1); email exchanges with B. Santovenia regarding repair of vehicles (.1)	AP	\$325.00	0.50	\$162.50
09/19/2023	Responding to emails regarding case management on adversary proceedings.	MME	\$550.00	0.40	\$220.00
09/19/2023	[No charge] Attending board meeting virtually.	MME		1.00	\$0.00
09/19/2023	Alfaro - Email exchange with opposing counsel regarding hearing on motion to dismiss.	RML	\$525.00	0.10	\$52.50
09/19/2023	Rasco - Review and analyze email from opposing counsel regarding requested discovery.	RML	\$525.00	0.20	\$105.00
09/19/2023	Ceperos - Revise Motion to Stay.	GJ	\$150.00	1.40	\$210.00
09/19/2023	Ceperos - Draft Motion to Dismiss.	GJ	\$150.00	0.50	\$75.00
09/19/2023	Further emails with M. Dhanji regarding payment of insurance premium for two policies (.1); emails with A. Pavon and team regarding production from Regions Bank and related matters (.1).	KDM	\$525.00	0.20	\$105.00
09/20/2023	Email exchange with Judge Gersten regarding sale of vehicles and direction (.1); telephone call and email exchange with M. Vazquez to provide direction on selling vehicles (.2)	AP	\$325.00	0.30	\$97.50
09/20/2023	Reviewing operation invoices in avid (.2); reviewing website and e-mails regarding same (.3); reviewing and approving stipulation of dismissal of D&O case (.1).	MME	\$550.00	0.60	\$330.00
09/20/2023	Review and analyze email from unit owner regarding ACC panel application, draft response, and draft email to Property Manager regarding same (0.1); draft email to Mabelle Jaramillo regarding appeal of ACC denial (0.1).	RML	\$525.00	0.20	\$105.00
09/20/2023	Cepero - Review and revise motion to stay pending resolution of Bankruptcy case (0.6); review and revise motion to dismiss (0.3).	RML	\$525.00	0.90	\$472.50
09/20/2023	Emails with A. Pavon and Receiver regarding proposed sale of remaining unused vehicles to CarMax and provide input regarding same.	KDM	\$525.00	0.20	\$105.00

09/21/2023	Email exchanges with M. Vazquez regarding Regions Bank account, Veritex Bank, and FS 1 account (.3); email exchanges with S. Banez regarding missing bank account statements (.2); brief review of Master Bank Record Inventory for All Accounts to determine missing bank statements (.2); review of Legal Professional Fees Summary for the period after April 26, 2022 to incorporate into Complaint against Phil. Ins. (.5); review of April -June TDA bank statements to determine deposit of homeowners (.2); telephone call with M. Vazquez regarding Rivo (.1); email exchange with L. Lagomasimo regarding bankruptcy proceeding of Navas (.1)	AP	\$325.00	1.60	\$520.00
09/21/2023	Research and review of 718.116 Assessments; liability; lien and priority; interest; collection to determine association fees that can be charged for property owned by bank following foreclosure (.7); review of docket for mortgage foreclosure action to determine status of same (.2); email exchange with Judge Gersten regarding sale of property and reduction in assessment fees (.2); correspondence with attorney from Phil Ins (.1)	AP	\$325.00	1.20	\$390.00
09/21/2023	Alfaro - Work on compiling attorney cases and mediation questions.	CP	\$275.00	0.30	\$82.50
09/21/2023	Preparing for and attending case management conference for Alfaro Fernandez case, discuss with co-counsel, email judge related cases for consolidation.	MME	\$550.00	1.00	\$550.00
09/21/2023	Alfaro - Work on litigation strategy in related to CMC.	RML	\$525.00	0.20	\$105.00
09/21/2023	Santiago Legal - Draft memorandum document and work on review and production.	GJ	\$150.00	1.30	\$195.00
09/21/2023	Emails with A. Pavon and FSR regarding Regions Bank account into which homeowner payments through ClickPay are deposited and review check from homeowner regarding same (.1); discuss with A. Pavon additional information needed from RevoPay regarding payments received through E-Check, review materials provided and communications with RevoPay regarding same, and coordinate following up with RevoPay (.2); review Stipulation of Dismissal with Prejudice pursuant to settlement in D&O Action and Order of Dismissal, and discuss with team (.1); emails and discuss with A. Pavon and P. Baloyra revisions and additions to make to the draft Complaint against crime policy carrier, review supporting materials, and provide input regarding same (.6); email from and discuss with A. Pavon foreclosure sale and buyer's obligation to pay past due Association fees pursuant to safe harbor statute, review same, strategize regarding same, coordinate sending summary and recommendation to Receiver, and review same (.5); email from counsel for crime insurance carrier following up on prior requests to interview former board members or independent contractors of the Association, for subpoenas from the Miami-Dade State Attorney's Office, and for agreements between board members and Association, discuss with A. Pavon responding to same, and review and revise response letter (.6); emails with A. Pavon, Receiver's office and Receiver regarding analysis of Navas bankruptcy proceeding and related foreclosure (.1).	KDM	\$525.00	2.20	\$1,155.00

09/22/2023	Email exchange with L. Lagomasimo regarding homeowner fees (.1); telephone call with M. Vazquez to discuss association fees (.1); email exchange with Revo to obtain records (.1); email exchange with Popular Bank to obtain records (.1)	AP	\$325.00	0.40	\$130.00
09/22/2023	[No charge] Reviewing invoices for next fee application.	MME		1.00	\$0.00
09/22/2023	Responding to emails regarding insurance (.1); reviewing operational invoices in avid and approving (.3).	MME	\$550.00	0.40	\$220.00
09/22/2023	Work on litigation strategy.	RML	\$525.00	0.20	\$105.00
09/22/2023	Cepero - Review and analyze amended complaint (0.2); review and revise motion to dismiss (0.5).	RML	\$525.00	0.70	\$367.50
09/22/2023	Ceperos - Revise to Motion to Stay; research regarding same.	GJ	\$150.00	1.20	\$180.00
09/22/2023	Review documents for production in legal malpractice cases.	GJ	\$150.00	0.90	\$135.00
09/24/2023	Emails with M. Damian regarding status of preparation of Complaint against crime insurance policy carrier and status of negotiations with carrier's counsel and follow up with team on revisions to draft Complaint (.2); emails with A. Pavon and RevoPay regarding additional records of homeowner payments needed by Association for reconciliation and discuss with team (.1).	KDM	\$525.00	0.30	\$157.50
09/25/2023	Email exchanges with Kapila Mukamal regarding missing bank accounts (.2); email exchange and telephone call with Popular Bank regarding additional documents needed (.2); email exchange with American Express regarding deficient subpoena responses (.1); email exchanges with Truist regarding additional documents needed (.3); email exchange with CIT bank regarding additional documents needed (.1); telephone call with First Citizens regarding updated subpoena needed (.1); conducted a comprehensive review of the missing account documents from American Express, Popular Credit Card, Truist, CIT - Community Association Bank, and City National Bank to complete accounting (1.5); telephone call with S. Banez regarding deposit slip gap (.2); draft subpoena to CIT Bank to obtain missing 2019 and 2020 bank statements (.5).	AP	\$325.00	3.20	\$1,040.00
09/25/2023	Work on towing and car sale of vehicles to Carmax.	hv	\$100.00	1.00	\$100.00
09/25/2023	Reviewing and revising amended complaint as against Rasco Klock; reviewing underlying factual documents and redrafting outline, summary and legal elements (4.2); e-mails regarding violation by secret meetings (.2).	MME	\$550.00	4.40	\$2,420.00

09/25/2023	Review Trustee's Notice of Deficiency for Confirmation filed in bankruptcy case of homeowner (.1); receive Notices from Bankruptcy Court with Zoom information for upcoming hearing in two bankruptcy cases of homeowners and emails with A. Pavon regarding coverage of same (.1); emails with Receiver and E. Thompson regarding upcoming confirmation hearing in bankruptcy case of homeowner (.1); multiple emails with A. Pavon and forensic accountant regarding various documents still needed from financial institutions and emails with A. Pavon regarding logging in to online accounts at Truist Bank and Popular Bank to obtain certain records, login to Truist account, and discuss with M. Damian (.3); emails with A. Pavon and American Express regarding the Receiver's supplement to Subpoena and the status and timing of production of responsive records and coordinate following up on same (.1); emails with A. Pavon and Popular Bank regarding obtaining documents responsive to Subpoena missing from production and discuss with team (.1); emails with A. Pavon and CIT Bank regarding documents missing from production in response to Subpoena and discuss status of same with team (.1); emails with A. Pavon regarding letter respond to latest letter from counsel for crime policy carrier and make further revisions to letter (.3).	KDM	\$525.00	1.20	\$630.00
09/25/2023	Rasco - Review draft Amended Complaint and discuss same with Melanie Damian.	TAC	\$525.00	1.00	\$525.00
09/25/2023	[PIIC Suit] Review materials and revise complaint.	PB	\$400.00	1.30	\$520.00
09/26/2023	Rasco - Meet and conference regarding additional documentation for amended complaint (.4); assess and compile evidentiary support for draft of amended complaint (1.8).	CP	\$275.00	2.20	\$605.00
09/26/2023	Prepare for hearing on motion for orders to show cause as to Sport Surfaces (0.2); attend hearing on motion for orders to show cause as to Sport Surfaces (0.5); review and analyze email regarding emergency ACC application and draft response (0.1); email exchange with forensic accountant (0.1); review and analyze analysis of Santiago Legal documents (0.2).	RML	\$525.00	1.10	\$577.50
09/26/2023	Reviewing and revising complaint against Crime Carrier, reviewing issues for Civil Remedy Notice and discuss with co-counsel (1.2); responding to Receiver regarding AB member secret meetings (.3).	MME	\$550.00	1.50	\$825.00
09/26/2023	Work on The Hammocks car sale, towing and pricing of vehicle; coordinating transportation to CarMax.	hv	\$100.00	1.00	\$100.00

09/26/2023	Email exchange with M. Vazquez regarding F. Cespedes refund (.1); email exchange with F. Cespedes regarding issue with refund (.1); email exchanges with J. Hernandez-Rodriguez from Popular Bank regarding missing statements (.2); draft updated subpoena to Truist Bank regarding missing transactions (.5); email exchange and telephone calls with S. Banez regarding missing bank statements (.4); email exchange with Popular Bank regarding subpoena (.1); email exchanges with A. Jones at Truist regarding missing bank statements (.2); email exchange with S. Cordero regarding status of Trujillo bankruptcy proceedings (.1); email exchange with K. Houston regarding I. Martinez claim (.1).	AP	\$325.00	1.50	\$487.50
09/26/2023	Emails with team regarding supplemental Subpoena to CIT Bank/First Citizens Bank, review and approve same, and coordinate service (.2); discuss with M. Damian revisions to latest draft Complaint against crime policy carrier, review, and make further revisions to same, and email to P. Baloyra regarding same (.8); emails with A. Pavon regarding status of gathering bank records needed to complete account reconstruction, review emails with forensic accountant and A. Pavon regarding same, and discuss with M. Damian (.2).	KDM	\$525.00	1.20	\$630.00
09/26/2023	Cepero - Research regarding case law for staying proceedings and draft memorandum regarding same; work on Exhibits to motion to stay; revise Motion to stay.	GJ	\$150.00	0.70	\$105.00
09/26/2023	Rasco - Review and edit draft Amended Complaint; discuss same with M. Damian; review pertinent case documents.	TAC	\$525.00	6.00	\$3,150.00
09/27/2023	Work on Sports Surfaces show cause strategy (0.2); work on proposed order (0.1).	RML	\$525.00	0.30	\$157.50
09/27/2023	Email exchange with M. Vazquez regarding missing bank account (.1); review of file to determine deposits into accounts with address of S. Katz (.3).	AP	\$325.00	0.40	\$130.00
09/27/2023	Email exchanges with Popular Bank to obtain deposit support (.3); email exchanges with S. Banez regarding missing bank support (.2); telephone call with S. Banez regarding Popular Bank (.1); receipt and review of additional records from Popular bank (21 pages) (.3); email exchange with S. Katz regarding association fees to SPK address (.1); review status of pleadings in the following cases: Arboleda, Trujillo, Sanibel, Navarro, and Martinez (.8); prepare supplemental subpoena to TD Ameritrade (.5); review of TD Ameritrade statements to determine missing information for bank reconciliation (.3); email exchange with M. Vazquez regarding pay instruction (.1).	AP	\$325.00	2.60	\$845.00
09/27/2023	Jaurigui - Work on mediation strategy.	RML	\$525.00	0.40	\$210.00
09/27/2023	Rasco - Assess and gather additional supporting documents for amended complaint.	CP	\$275.00	1.80	\$495.00
09/27/2023	Calls and emails to strategize regarding Civil Remedy Notice on Crime Policy and review complaint and analysis of statutory violation.	CPM	\$500.00	2.30	\$1,150.00



09/27/2023	Reviewing and sending violation letter to AB member (.3); reviewing the insurance demands in filed cases to discuss bad faith (.3).	MME	\$550.00	0.60	\$330.00
09/27/2023	Discuss with A. Pavon the outcome of the hearings in two bankruptcy cases of homeowners and coordinate sending reports to Receiver and E. Thompson regarding same (.2); emails with A. Pavon regarding one bankruptcy case and debtor's payments to Association pursuant to Plan, review court filings from case, and provide direction to A. Pavon regarding communications with Trustee and debtor's counsel (.2); work with C. Perez on revising Complaint for breach of contract against Crime Policy carrier and Civil Remedy Notice to be filed through Department of Financial Services, review applicable statute, emails and telephone call with J. Jomarron regarding same and letter responding to carrier's counsel's latest letter requesting interviewing and government subpoenas, and strategize regarding same (.9); revise letter and send to Receiver and J. Jomarron for input (.4); emails with FSR, A. Pavon, and R. Landy regarding homeowners who paid Association fees to former attorney for Association and contacting that attorney, review relevant records, and provide input regarding same (.2).	KDM	\$525.00	1.90	\$997.50
09/27/2023	Sports Surfaces - Draft proposed Order Receiver's Motion for Order to Show Cause.	GJ	\$150.00	1.50	\$225.00
09/27/2023	Rasco - Review pertinent case documents; discuss same with C. Perse and K. Pearson; continue editing Amended Complaint.	TAC	\$525.00	6.00	\$3,150.00
09/28/2023	Telephone calls and correspondence with M. Vazquez regarding car sale and original POA (.3); email exchange with E. Thompson regarding original power of attorney (.1); email exchange with Amex regarding deficient subpoena and missing records (.1); email exchanges and telephone calls with S. Banez regarding bank reconciliation (.3); finalize subpoena to TD Bank to obtain missing payment details (.2); receipt and review of offers from Car Max and correspondence from C. Ticker regarding same (.3).	AP	\$325.00	1.40	\$455.00
09/28/2023	Rasco - Work on litigation strategy.	RML	\$525.00	0.30	\$157.50
09/28/2023	Draft chart for CarMax offers, update data of vehicle spreadsheet, and work on getting vehicles sold.	hv	\$100.00	1.10	\$110.00
09/28/2023	Draft, revise and submit Civil Remedy Notice on Crime Policy and various calls and emails regarding same.	CPM	\$500.00	2.00	\$1,000.00

09/28/2023	Continue working with C. Perez on Civil Remedy Notice for claim against Crime Policy carrier, review and approve online submission, discuss with J. Jomarron, emails with Receiver regarding same, coordinate finalizing and submitting Civil Remedy Notice, and discuss with M. Damian (.5); emails with Receiver and J. Jomarron regarding proposed letter to counsel for Crime Policy carrier and draft Complaint, further discuss with C. Perez and A. Pavon, and finalize and send letter with Complaint to counsel (.4); emails with A. Pavon and Ally Bank regarding updated payoff letter needed for vehicles that CarMax is considering purchasing and further discuss with A. Pavon the status and timing of same and the sale of the vehicles (.2); discuss with A. Pavon and M. Damian requirements and logistics for sale of vehicles to CarMax, coordinate sending report to Receiver regarding proposed sales of all vehicles and their condition, and coordinate scheduling appointment for Damian to sign paperwork for vehicle sales at CarMax (.3); review emails with Ally Bank regarding status of payoff letters and further discuss with A. Pavon (.1); email from A. Pavon to Receiver regarding proposed vehicles sales, their condition, payoff amounts for Ally Bank, expected net proceeds, and possibly selling one vehicle for to scrap vehicle purchaser, and provide input regarding same (.2); review First and Second Amended Chapter 13 Plan in bankruptcy case of homeowner and strategize regarding same and effect on Association (.2); review Court filings in two other bankruptcy cases of homeowners and emails with team regarding same (.1).	KDM	\$525.00	2.00	\$1,050.00
09/28/2023	Rasco - Review pertinent case documents; finalize Amended Complaint.	TAC	\$525.00	1.20	\$630.00
09/29/2023	Multiple telephone calls, email exchanges, and text correspondence with M. Vazquez regarding sale of vehicles (1.0); telephone call with three scrap companies to determine value of vehicle (.3); email exchange with Judge Gersten providing update on vehicles sales and seeking authority to sell (.3); telephone call with Emily, point of contact at Car Max, to provide direction on sale (.1)	AP	\$325.00	1.70	\$552.50
09/29/2023	[No charge] Sport Surfaces - Review and analyze order to show cause and work on hearing strategy.	RML		0.10	\$0.00
09/29/2023	Leaf - Revise addendum and draft email to Eric Thompson regarding same.	RML	\$525.00	0.10	\$52.50

09/29/2023	Further emails with J. Jomarron regarding draft Complaint and final demand letter sent to counsel for Crime Policy carrier and further discuss with team deadline to respond to final demand for payment (.2); email from First Citizens Bank/CIT Bank regarding production in response to Supplemental Subpoena and emails with A. Pavon regarding downloading same and sending to forensic accountant to complete reconstruction of accounts (.2); multiple emails and discuss with A. Pavon and H. Villalobos regarding selling certain vehicles to scrap companies and provide input regarding same (.2); emails with Ally Bank regarding updated payoff letters for five vehicles to be sold to CarMax, review same, discuss with A. Pavon (.1); multiple emails and discuss with A. Pavon and M. Damian selling vehicles to CarMax, updated payoff letters from Ally Bank for certain vehicles, projected net proceeds, logistics for in-person sale, and obtaining approval from Receiver (.2); emails with Receiver regarding sales to CarMax and option to sell two vehicles to scrap company, and provide input regarding same (.1); review Order to Show Cause as to Sports Surfaces and discuss with team (.1).	KDM	\$525.00	1.10	\$577.50
09/29/2023	Research market value of Chevrolet Silverado 1500 with several car companies.	hv	\$100.00	0.50	\$50.00
09/29/2023	Sports Surfaces - Review correspondence form court.	GJ	\$150.00	0.10	\$15.00
09/29/2023	[No charge] Revise Motion to Stay and exhibits.	GJ		0.10	\$0.00
09/30/2023	CarMax selling 12 cars reviewing paperwork and executing same.	MME	\$550.00	2.40	\$1,320.00
09/30/2023	Emails with M. Damian and A. Pavon regarding meeting at CarMax to execute the paperwork for the sales of Association vehicles and discuss with M. Damian.	KDM	\$525.00	0.10	\$52.50

**462.50      \$194,205.00**

**Costs & Expenses**

Date	Description	Amount
07/05/2023	DLE Court Reporters. Invoice 25843. Certificate of Non-Attendance Corporate Rep. (Excellent Services) Appearance, R/C of Excellent Services. 7.5.23	\$160.00
07/12/2023	DLE Process Servers. Invoice 2023032098. Subpoena to be served on Records Custodian of H. Gregory 1. Inc. 7.12.23	\$35.00
07/12/2023	Postage	\$0.63
07/19/2023	DLE Process Servers. Invoice 2023031598. Subpoena to be served on Truist Bank Subpoena Operations Office. Additional Address. 7.19.23	\$120.00
07/24/2023	Postage	\$0.63
07/26/2023	Postage	\$9.01
07/27/2023	DLE Process Servers. Invoice 2023029014. Subpoena to be served on: Records Custodian Endlessly Handy LLC c/o R/A: Stephanie Calixte. Additional Address. 7.27.23	\$95.00
07/27/2023	DLE Process Servers. Invoice 2023029017. Subpoena to be served on Records Custodian Jygy's Cleaning Services LLC c/o R/A Stephanie Claixte. Additional Address 07.27.23	\$95.00
07/31/2023	Accurint Research Fee	\$14.48
07/31/2023	Lexis Nexis Advance Legal Research Fee	\$165.26

07/31/2023	Photocopies	\$14.22
08/03/2023	DLE Process Servers. Invoice 2023036712. Subpoena to be served on Sport Surfaces, LLC c/o Paul Gold. 08.03.23	\$40.00
08/03/2023	DLE Process Servers. Invoice 2023035333. Subpoena to be served on Veritext Community Bank. Additional address. 8.3.23	\$105.00
08/08/2023	DLE Process Servers. Invoice 2023037534. Subpoena to be served on Yadel Santiago, Esq. 08.08.23	\$35.00
08/10/2023	DLE Process Servers. Invoice 2023037533. Subpoena to be served on Santiago Legal, PLLC. c/o Mr. Yadel Santiago as RA. 08.08.23	\$35.00
08/14/2023	DLE Court Reporters. Invoice 26304. Certificate of Non-Attendance Corporate Rep. Certification of Non-Appearance. 8.14.23	\$130.00
08/16/2023	Regions Bank Legal Dept. Invoice 17968. Response of subpoena. 6.27.23	\$30.00
08/16/2023	Regions Bank Legal Dept. Invoice 17932. Response of subpoena. 6.23.23	\$15.00
08/16/2023	Regions Bank Legal Dept. Invoice 17933. Response of subpoena. 6.23.23	\$15.00
08/31/2023	Photocopies	\$20.88
08/31/2023	Pacer/ Court Documents	\$2.60
08/31/2023	Pacer/ Court Documents	\$0.60
08/31/2023	Lexis Nexis Advance Legal Research Fee	\$322.35
09/06/2023	Postage	\$1.89
09/29/2023	DLE Process Servers. Invoice 2023048613. Subpoena to be served on TD Bank c/o United States Corporation Company. 9.29.23	\$60.00
09/30/2023	Pacer/ Court Documents	\$2.40
09/30/2023	Lexis Nexis Advance Legal Research Fee	\$192.42
09/30/2023	Photocopies	\$23.58
		<b>\$1,740.95</b>

#### ATTORNEY/PARALEGAL SUMMARY

<u>Name</u>	<u>Initials</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Russell Landy	RML	79.3	\$525.00	\$41,527.50
Melanie Damian	MME	60.1	\$550.00	\$31,405.00
Kenneth Murena	KDM	85.4	\$525.00	\$44,835.00
Adriana Pavon	AP	85.2	\$325.00	\$27,690.00
Christopher Perse	CP	76.2	\$275.00	\$20,680.00
Robert Levenson	RKL	13.8	\$525.00	\$7,245.00
Thomas Culmo	TAC	19.1	\$525.00	\$10,027.50
Reesea Saetae	rs	6.6	\$100.00	\$380.00
Casandra Murena	CPM	7.9	\$500.00	\$3,950.00
Patricia Baloyra	PB	9.3	\$400.00	\$3,720.00
Gabriela Jimenez	GJ	16.0	\$150.00	\$2,385.00
Hector Villalobos	hv	3.6	\$100.00	\$360.00

Invoice Amount:	\$195,945.95
Other Outstanding Balances:	\$0.00
All Invoices Amount:	\$195,945.95
Amount Applied:	\$0.00
<b>Balance Due:</b>	<b>\$195,945.95</b>

**Payments Since Last Invoice**

Date	Description	Amount
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# INVOICE

Invoice # 562  
Date: 08/08/2023  
Due On: 09/07/2023

## 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
07/01/2023	JJ	Reviewed and analyzed detailed electronic mail correspondence from Nelly Arriaga demanding a refund of an overpayment to the Hammocks.	0.30	\$150.00
07/01/2023	JJ	Prepared electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding review, analysis, and recommendation on Nelly Arriaga's demand for a refund of an overpayment to the Hammocks.	0.30	\$150.00
07/01/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) regarding additional research on Nelly Arriaga refund request.	0.10	\$50.00
07/01/2023	JJ	Electronic mail correspondence to A. Pavon requesting additional research and confirmation on funds received from Alfaro and Fernandez	0.10	\$50.00

		concerning overpayment by Nelly Arriaga.		
07/01/2023	JJ	Prepared memorandum to file concerning Hammocks Receivership Meeting conducted with the Advisory Board of Directors and Receiver Judge Gersten (ret.) on June 27, 2023.	0.80	\$400.00
07/02/2023	JJ	Received and reviewed multiple electronic mail correspondence from Receiver Judge Gersten regarding Carlos Villalobos' proposal for Katherine Johnson to serve as the CPA for the Finance Committee.	0.20	\$100.00
07/03/2023	JJ	Electronic mail correspondence to Russell Landy regarding approval of Clubhouse contract.	0.10	\$50.00
07/03/2023	JJ	Telephone conference with Adriana Pavon regarding funds outstanding to Nelly Arriaga and to formulate strategy for contacting Alfaro and Fernandez regarding owner claims of payments not transferred to the Hammocks.	0.30	\$150.00
07/03/2023	JJ	Received and reviewed electronic mail correspondence from Corey Tickner regarding FSR handling of all phone calls directly at the Clubhouse.	0.10	\$50.00
07/03/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Idalmen Ardisson to the ACC committee regarding their upcoming meeting.	0.20	\$100.00
07/03/2023	JJ	Received and reviewed electronic mail correspondence from Russell Landy regarding process for approving ACC applications during and after the receivership.	0.10	\$50.00
07/03/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding ACC protocols.	0.10	\$50.00
07/03/2023	JJ	Received and reviewed proposed Board Member Meeting Notice of FSR.	0.10	\$50.00
07/03/2023	JJ	Received and reviewed electronic mail correspondence from Steve Katz regarding owner collection file.	0.10	\$50.00
07/03/2023	JJ	Received and reviewed electronic mail	0.10	\$50.00

		correspondence from Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding upcoming first ACC meeting.		
07/05/2023	JJ	Telephone conference with Donald Kearns regarding board of director meeting procedures.	0.40	\$200.00
07/05/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding status update on Hammocks matters.	0.50	\$250.00
07/05/2023	JJ	Received multiple electronic mail correspondence from FSR regarding updates to the website for committee details.	0.20	\$100.00
07/07/2023	JJ	Received and reviewed exchange of electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) regarding concerns raised by owners about Prestige Towing and connection to the family of the prior board of directors.	0.20	\$100.00
07/07/2023	JJ	Received and reviewed electronic mail correspondence from Pete Cabrera and FSR regarding new configuration for the clubhouse seating during Board of Director meetings.	0.10	\$50.00
07/07/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) concerning Donald Kearns' concern about four auto thefts at the Heron at the Hammocks community.	0.10	\$50.00
07/07/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from owners, Idalmen Ardisson, Receiver Judge Gersten (ret.), and Donald Kearns regarding feedback on the ACC meeting.	0.20	\$100.00
07/07/2023	JJ	Received and reviewed exchange of emails regarding approval of Board Member Meeting Notice.	0.20	\$100.00
07/07/2023	JJ	Received and reviewed exchange of emails concerning replacement of HVAC units in the Clubhouse.	0.10	\$50.00
07/07/2023	JJ	Reviewed and analyzed proposed budget timeline and communications regarding board and receiver approval.	0.20	\$100.00



07/10/2023	JJ	Received and reviewed Cepero's Motion for Relief from Stay.	0.20	\$100.00
07/11/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Receiver Judge Gersten (ret.) and FSR regarding review of pool pump proposal.	0.30	\$150.00
07/11/2023	JJ	Reviewed and analyzed electronic mail correspondence from FSR and enclosed letter to all Hammocks owners.	0.10	\$50.00
07/11/2023	JJ	Reviewed and analyzed multiple emails from FSR and Receiver Judge Gersten including enclosed FSR owner call log.	0.20	\$100.00
07/12/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson enclosing 2008 Hammocks budget with lifecycles and estimated costs for components within the community.	0.30	\$150.00
07/13/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Donald Kearns and Receiver Judge Gersten (ret.) regarding procedure for Vizcaya to terminate their association.	0.20	\$100.00
07/14/2023	JJ	Reviewed and analyzed exchange of electronic mail correspondence approving ACC application of the Cortland.	0.10	\$50.00
07/14/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) regarding pool pump proposal.	0.30	\$150.00
07/14/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Idalmen Ardisson, FSR and Receiver Judge Gersten (ret.) regarding approval of roof tiles.	0.30	\$150.00
07/14/2023	JJ	Reviewed and analyzed electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) regarding form for collection of owner information.	0.10	\$50.00
07/16/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from board members and Receiver Judge Gersten regarding homeowner	0.20	\$100.00

		email addresses.		
07/16/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Receiver Judge Gersten (ret.) to Carlos Villalobos regarding Hammocks policies for collection of owner email addresses and notices to owners.	0.10	\$50.00
07/17/2023	JJ	Reviewed and analyzed exchange of electronic mail correspondence between Receiver Judge Gersten (ret.) and Carlos Villalobos regarding owner email addresses.	0.10	\$50.00
07/17/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence regarding Cortland's ACC application and corresponding approval.	0.20	\$100.00
07/18/2023	JJ	Reviewed and analyzed Receiver Judge Gersten (ret.)'s Fourth Supplemental Report.	1.50	\$750.00
07/20/2023	JJ	Exchanged, reviewed, and analyzed numerous electronic mail correspondence from board members and Receiver Judge Gersten (ret.) regarding collections at the Hammocks for delinquent owners and concerns about inaccuracies in ledgers maintained by FSR.	0.30	\$150.00
07/20/2023	JJ	Received and reviewed electronic mail correspondence from Jacqueline Greenberg, CPA, regarding upcoming Finance Committee meeting.	0.10	\$50.00
07/20/2023	JJ	Electronic mail correspondence to Idalmen Ardisson regarding meeting with Jacqueline Greenberg, Finance Committee CPA.	0.10	\$50.00
07/20/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from board members, Receiver, and FSR regarding composition of fining committee.	0.20	\$100.00
07/20/2023	JJ	Exchanged, reviewed, and analyzed numerous electronic mail correspondence from board members, Receiver, and FSR regarding composition of fining committee and presentation on collection services.	0.20	\$100.00
07/20/2023	JJ	Exchanged electronic mail correspondence with FSR regarding damages to Gerald Kohn's	0.10	\$50.00

		property caused by a fallen tree on Hammocks common area property.		
07/20/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) regarding analysis on liability for damages to Gerald Kohn's property.	0.10	\$50.00
07/20/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from FSR enclosing references and information concerning services of Axela for other communities.	0.20	\$100.00
07/20/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from Carlos Villalobos and FSR confirming governing documents committee meeting.	0.10	\$50.00
07/20/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence concerning Miami Herald's report on the legal fees associated with the Receivership at the Hammocks.	0.20	\$100.00
07/20/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence from Receiver Judge Gersten (ret.) regarding owner complaints about Wild Lime Park fence and enclosing prior violations issued by the county for the erection of the fence.	0.20	\$100.00
07/20/2023	JJ	Received and reviewed exchange of electronic mail correspondence from Receiver Judge Gersten (ret.) and regarding the Hammocks storm drain inspections.	0.10	\$50.00
07/20/2023	JJ	Received and reviewed FSR's owner call log.	0.10	\$50.00
07/20/2023	JJ	Attended Zoom video meeting of Hammocks Receivership with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson in preparation for Town Hall Meeting IV.	1.10	\$550.00
07/20/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among board members, receiver, and FSR concerning notices from Banco Popular to owners regarding online payments and FSR's responsive posting on the website.	0.30	\$150.00
07/20/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence concerning revisions to the clubhouse rental agreement.	0.20	\$100.00

07/20/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among Receiver and FSR concerning new protocol for maintaining call logs by FSR of Hammocks owners calls.	0.20	\$100.00
07/20/2023	JJ	Prepared memorandum to file regarding action items discussed on Hammocks Lawyers Only video conference.	0.30	\$150.00
07/20/2023	JJ	Received and reviewed multiple electronic mail correspondence from Receiver Judge Gersten (ret.) and Finance Committee members.	0.10	\$50.00
07/20/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (Ret.) and FSR concerning Axela for collection services.	0.10	\$50.00
07/21/2023	JJ	Telephone conference with Danilo Baptista regarding Zoom recording of the last board meeting of July 11, 2023.	0.10	\$50.00
07/21/2023	JJ	Accessed Zoom recording and chat transcript of the last board meeting of July 11, 2023.	0.10	\$50.00
07/21/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson enclosing copy of chat transcript of the last board meeting of July 11, 2023, and a link to the recording.	0.10	\$50.00
07/21/2023	JJ	Telephone conference with Michael Kaufman regarding update on Sunflower's incorporation and desire to become their own local association.	0.50	\$250.00
07/21/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding Sunflower's incorporation and desire to become a local association.	0.50	\$250.00
07/21/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding assembling of the fining committee.	0.10	\$50.00
07/21/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding updating Hammocks website with Finance Committee details.	0.10	\$50.00

07/21/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson and Finance Committee members.	0.10	\$50.00
07/21/2023	JJ	Received and reviewed electronic mail correspondence from FSR and Carlos Villalobos regarding approval of Agenda for the Governing Documents Committee meeting.	0.10	\$50.00
07/22/2023	JJ	Revised and finalized proposed rules for the Hammocks Board of Directors.	2.00	\$1,000.00
07/24/2023	JJ	Reviewed and analyzed Cepero bankruptcy orders in preparation for attorney meeting with Receiver Judge Gersten (ret.), Eric Thompson, and Kenneth Dante Murena.	0.80	\$400.00
07/24/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.), Eric Thompson, and Kenneth Dante Murena reviewing and analyzing the Cepero bankruptcy appellate orders and formulating strategy for next steps to secure a finding of no damages to Hammocks.	1.10	\$550.00
07/24/2023	JJ	Reviewed and analyzed exchanged of electronic mail correspondence between Juan Franco and Judge Gersten (ret.) regarding Elite Security responsibility for patrolling Cortland property.	0.10	\$50.00
07/24/2023	JJ	Received and reviewed multiple electronic mail correspondence among FSR, Idalmen Ardisson, and Receiver Judge Gersten (ret.) concerning posting on Hammocks website of correct committee information.	0.10	\$50.00
07/24/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence from Receiver Judge Gersten (ret.) and FSR concerning security patrol concerns and schedule.	0.20	\$100.00
07/24/2023	JJ	Received and reviewed electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) concerning new towing company contract.	0.10	\$50.00
07/24/2023	JJ	Received and reviewed multiple electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) concerning call volume about updates to the owner payment ledgers.	0.10	\$50.00

07/24/2023	JJ	Reviewed and analyzed Hammocks governing documents and applicable Florida law in preparation of proposed draft of Board of Directors rules.	1.80	\$900.00
07/24/2023	JJ	Received and reviewed Receiver Judge Gersten (ret.) motion to approve settlement with Sarmina Cetraro.	0.20	\$100.00
07/24/2023	JJ	Exchanged electronic mail correspondence with Russell Landy regarding updates to the Clubhouse Rental Agreement.	0.10	\$50.00
07/25/2023	JJ	Exchanged multiple electronic mail correspondence with FSR and Receiver Judge Gersten (ret.) regarding FSR's plan to address owner delinquencies.	0.20	\$100.00
07/25/2023	JJ	Received and reviewed multiple electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) concerning procedure for adding items to Board meeting agendas going forward.	0.20	\$100.00
07/25/2023	JJ	Received and reviewed additional electronic mail correspondence among Juan Franco and Receiver Judge Gersten (ret.) regarding security services at the Cortland.	0.10	\$50.00
07/25/2023	JJ	Revised and finalized proposed rules of the Hammocks board of directors.	1.00	\$500.00
07/25/2023	JJ	Attended FSR financial reporting presentation.	1.30	\$650.00
07/25/2023	JJ	Received and reviewed executed Agreed Order approving Sarmina Cetraro settlement and release.	0.10	\$50.00
07/26/2023	JJ	Reviewed and analyzed multiple postings by Marcoantonio Real regarding the legal fees incurred by the Hammocks during the Receivership.	0.30	\$150.00
07/26/2023	JJ	Reviewed and analyzed Financial Reports from FSR in anticipation of the Financial Overview meeting.	0.30	\$150.00
07/26/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson regarding rules of the board of	1.10	\$550.00

		directors, Sunflower neighborhood, and reminder notices from FSR to owners with delinquent assessments.		
07/26/2023	JJ	Prepared proposed notice of Town Hall Meeting IV for review and approval by Receiver Judge Gersten (ret.).	0.50	\$250.00
07/26/2023	JJ	Exchanged multiple electronic mail correspondence with FSR and Receiver Judge Gersten (ret.) regarding request from Idalmen Ardisson for a copy of the meeting minutes and proposed notice of meeting of the board of directors.	0.20	\$100.00
07/26/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) regarding upcoming Town Hall IV meeting.	0.10	\$50.00
07/27/2023	JJ	Telephone conference with Melissa Vazquez and Alyson Theale reviewing and analyzing the notices to be sent by FSR to owners that are delinquent on their assessments.	1.10	\$550.00
07/28/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding receivership issues including telephone conference with Alyson Theale and Melissa Vazquez regarding costs charged by FSR.	0.90	\$450.00
07/28/2023	JJ	Exchanged numerous emails Receiver Judge Gersten, legal team, and FSR regarding procedures for committee meetings.	0.40	\$200.00
07/28/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding implementation of Rules of the Board of Directors.	0.10	\$50.00
07/28/2023	JJ	Received and reviewed multiple electronic mail correspondence from Idalmen Ardisson and FSR regarding minutes of the ACC committee and posting of notice for upcoming ACC meeting.	0.20	\$100.00
07/28/2023	JJ	Performed legal research regarding governing documents and statutes applicable to rules of board of directors.	0.40	\$200.00
07/28/2023	JJ	Prepared comprehensive electronic mail	0.30	\$150.00

		correspondence to Receiver Judge Gersten (ret.) citing law applicable to rules of the board of directors.		
07/28/2023	JJ	Revised Rules of the Board of Directors.	0.20	\$100.00
07/28/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) enclosing revised Rules of the Board of Directors.	0.10	\$50.00
07/29/2023	JJ	Legal opinion letter to Receiver Judge Gersten (ret.) and Eric Thompson regarding damages to the home of Gerald Kohn.	0.50	\$250.00
07/30/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) regarding posting of Town Hall IV meeting notice.	0.10	\$50.00
07/31/2023	JJ	Attended the Hammocks Governing Documents Committee meeting.	1.10	\$550.00
07/31/2023	JJ	Exchanged multiple communications with Receiver Judge Gersten (ret.) regarding Hammocks Governing Documents Committee meeting.	0.30	\$150.00
07/31/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding various legal issues.	0.80	\$400.00
07/31/2023	JJ	Telephone conference with Donald Kearns regarding outcome of Governing Documents Committee meeting and next steps for procedure and implementation.	0.20	\$100.00
07/31/2023	JJ	Telephone conference with Idalmen Ardisson regarding Architectural Control Committee and Finance committee procedures for implementation of decisions and various legal issues.	1.00	\$500.00
07/31/2023	JJ	Received and reviewed multiple electronic mail correspondence among board members, FSR, and Receiver Judge Gersten (ret.) concerning unkempt palms and low hanging branches.	0.20	\$100.00
07/31/2023	JJ	Electronic mail correspondence to First Service Residential approving payment to Gerald Kohn for repairs to the pool enclosure in exchange for a release of any further liability.	0.30	\$150.00



07/31/2023	JJ	Received and reviewed electronic mail correspondence from Eric Thompson regarding revisions to the Rules of the Board of Directors.	0.10	\$50.00
07/31/2023	JJ	Performed legal research regarding authority for confidential legal meetings with the board of directors to discuss pending or potential litigation.	0.50	\$250.00
07/31/2023	JJ	Reviewed, revised, and finalized proposed Rules of the Board of Directors for final approval by Receiver Judge Gersten (ret.).	0.30	\$150.00
07/31/2023	JJ	Comprehensive electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding revisions to the Rules of the Board of Directors and legal opinions concerning same.	0.30	\$150.00
07/31/2023	JJ	Exchanged multiple electronic mail correspondence with First Service Residential and Receiver Judge Gersten (ret.) regarding posting of Town Hall IV meeting notice on the Hammocks website.	0.20	\$100.00
			<b>Services Subtotal</b>	<b>\$18,500.00</b>

### Expenses

Date	Notes	Quantity	Rate	Total
07/19/2023	Zoom monthly fee for webinar and pro.	1.00	\$120.98	\$120.98
			<b>Expenses Subtotal</b>	<b>\$120.98</b>
			<b>Subtotal</b>	<b>\$18,620.98</b>
			<b>Total</b>	<b>\$18,620.98</b>

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

Please pay within 30 days.



# INVOICE

Invoice # 636  
Date: 09/22/2023  
Due On: 10/22/2023

## The Morgan Law Group, P.A.

55 Merrick Way, Suite 404  
Coral Gables, FL 33134

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
08/01/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding review and analysis of Gerald Kohn's claim for screen repairs.	0.30	\$150.00
08/01/2023	JJ	Reviewed and analyzed proposed Release for Gerald Kohn's screen repairs.	0.30	\$150.00
08/02/2023	JJ	Reviewed and analyzed proposed minutes of the meeting of the advisory board of directors.	0.20	\$100.00
08/02/2023	JJ	Received, reviewed, and exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and the advisory board of directors regarding comments on the proposed meeting minutes.	0.10	\$50.00
08/02/2023	JJ	Reviewed and analyzed proposed release for execution by Gerald Kohn for damages caused to his pool enclosure due to a fallen tree that rotted on Hammocks property.	0.20	\$100.00
08/02/2023	JJ	Electronic mail correspondence to FSR enclosing approved release for execution by Gerald Kohn for damages caused to his pool enclosure due to a fallen tree that rotted on Hammocks property.	0.10	\$50.00
08/02/2023	JJ	Received and reviewed electronic mail correspondence from Eric Thompson regarding invoices due to Miami-Dade Police Department.	0.10	\$50.00
08/02/2023	JJ	Exchanged communications with Pete Cabrera regarding amount outstanding to Miami-Dade Police Department.	0.10	\$50.00
08/02/2023	JJ	Exchanged and reviewed multiple electronic mail correspondence	0.10	\$50.00

		from the advisory board of directors approving the meeting minutes.		
08/02/2023	JJ	Attend to following up with advisory board members and FSR to finalize the dates for the committee meetings.	0.50	\$250.00
08/02/2023	JJ	Received and reviewed multiple electronic mail correspondence from the advisory board of directors and Receiver Judge Gersten (ret.) regarding revisions and comments to the meeting minutes.	0.10	\$50.00
08/02/2023	JJ	Numerous electronic mail correspondence among Receiver Judge Gersten (ret.), Eric Thompson, and FSR team members regarding approved release for Gerald Kohn to sign concerning screen repairs needed due to rotted tree on Hammocks property.	0.30	\$150.00
08/04/2023	JJ	Telephone conference with Idalmen Ardisson regarding outcome of second ACC meeting and proposed protocol for future ACC meetings.	0.40	\$200.00
08/04/2023	JJ	Comprehensive electronic mail correspondence to Receiver Judge Gersten (ret.) regarding outcome of second ACC meeting and proposed next steps.	0.30	\$150.00
08/04/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) regarding instructions on next steps for ACC meeting protocols to be performed by FSR.	0.20	\$100.00
08/04/2023	JJ	Reviewed and analyzed Receiver's Notice of Filing Authorities in advance of hearing on Cepero's Motion for Relief from Receiver's Order 11/21/22.	0.30	\$150.00
08/07/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) preparing for upcoming Town Hall Meeting IV.	0.20	\$100.00
08/07/2023	JJ	Zoom video conference as practice session for Town Hall Meeting IV with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson.	1.30	\$650.00
08/07/2023	JJ	Continued Zoom video conference as practice session for Town Hall Meeting IV with Receiver Judge Gersten (ret.) and Eric Thompson.	0.20	\$100.00
08/07/2023	JJ	Exchanged multiple communications with Idalmen Ardisson regarding concerns with FSR.	0.40	\$200.00
08/07/2023	JJ	Exchanged communications with Danilo Baptista from FSR regarding updates on security and Clubhouse use by the owners.	0.20	\$100.00
08/07/2023	JJ	Exchanged electronic mail correspondence with Russell Landy regarding finalizing the Clubhouse Rental Agreement.	0.10	\$50.00
08/07/2023	JJ	Received and reviewed finalized meeting minutes.	0.20	\$100.00
08/07/2023	JJ	Received and reviewed owner call log from FSR.	0.10	\$50.00
08/07/2023	JJ	Received and reviewed multiple towing proposals and electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) approving the new tow company.	0.30	\$150.00

08/07/2023	JJ	Attend to review of proposed tree maintenance schedule.	0.30	\$150.00
08/08/2023	JJ	Attend to Zoom practice session with Melanie Damian in anticipation of Hammocks Town Hall Meeting IV.	0.30	\$150.00
08/08/2023	JJ	Attend to additional Zoom practice session with Receiver Judge Gersten (ret.) and Melanie Damian in preparation for Hammocks Town Hall Meeting IV.	0.30	\$150.00
08/08/2023	JJ	Exchanged numerous communications with Receiver Judge Gersten (ret.) and Melanie Damian regarding updates on FSR processes and security detail.	0.40	\$200.00
08/08/2023	JJ	Received and reviewed numerous electronic mail correspondence with FSR regarding update on owner ledgers.	0.20	\$100.00
08/08/2023	JJ	Received and reviewed numerous electronic mail correspondence from Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding approval of ACC applications.	0.20	\$100.00
08/08/2023	JJ	Attended Hammocks Town Hall IV meeting via Zoom video conference.	1.00	\$500.00
08/08/2023	JJ	Received and reviewed board members comments regarding the outcome of the Town Hall Meeting IV.	0.10	\$50.00
08/08/2023	JJ	Attend to posting of security information on the Hammocks website.	0.20	\$100.00
08/08/2023	JJ	Received and reviewed multiple electronic mail correspondence regarding financial reports of the Hammocks in preparation for Town Hall Meeting IV.	0.10	\$50.00
08/08/2023	JJ	Reviewed and analyzed Financial Statement package prepared by First Service Residential for the board of directors.	0.40	\$200.00
08/09/2023	JJ	Prepared comprehensive electronic mail correspondence to Receiver Judge Gersten (ret.) and legal team regarding strategy for demanding claim decision from crime insurance policy carrier.	0.10	\$50.00
08/10/2023	JJ	Telephone conference with Kenneth Dante Murena regarding strategy for demand letter for tender of crime policy limits.	0.50	\$250.00
08/10/2023	JJ	Received and reviewed multiple electronic mail correspondence from Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding approval of owner ACC application.	0.10	\$50.00
08/11/2023	JJ	Received and reviewed multiple electronic mail correspondence among Receiver Judge Gersten (ret.) and Kenneth Dante Murena regarding approval of crime policy tender demand letter.	0.10	\$50.00
08/11/2023	JJ	Received and reviewed multiple electronic mail correspondence discussing comprehensive complaint made by an owner concerning various issues at the Hammocks including tree maintenance.	0.30	\$150.00
08/11/2023	JJ	Received and reviewed multiple electronic mail correspondence with FSR and Receiver Judge Gersten (ret.) regarding frustrated owner complaint about ACC application.	0.20	\$100.00

08/11/2023	JJ	Received and reviewed numerous electronic mail correspondence with FSR and board members regarding owner complaints about their account ledgers.	0.20	\$100.00
08/14/2023	JJ	Received and reviewed multiple electronic mail correspondence exchanged by Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding over flow parking.	0.10	\$50.00
08/14/2023	JJ	Received, reviewed, and exchanged electronic mail correspondence among Receiver Judge Gersten (ret.) and Idalmen Ardisson regarding rescheduling of the finance committee meeting to ensure availability of CPA.	0.10	\$50.00
08/14/2023	JJ	Received and reviewed multiple electronic mail correspondence from Idalmen Ardisson, Receiver Judge Gersten (ret.), and FSR regarding approval of ACC applications.	0.20	\$100.00
08/14/2023	JJ	Received and reviewed multiple electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) regarding condition of Wild Lime Gym.	0.10	\$50.00
08/14/2023	JJ	Received and reviewed call report from FSR.	0.10	\$50.00
08/15/2023	JJ	Hammocks Receivership Meeting via Zoom video conference with Receiver Judge Gersten (ret.), Eric Thompson, Melissa Vazquez, and Alyson Theale regarding delinquent owner collections and parking violations in the community.	1.30	\$650.00
08/15/2023	JJ	Exchanged multiple electronic mail correspondence with Alyson Theale and Receiver Judge Gersten (ret.) regarding collection checklist.	0.30	\$150.00
08/15/2023	JJ	Reviewed and analyzed prior versions of the Hammocks FSR Collection Checklist.	0.40	\$200.00
08/16/2023	JJ	Reviewed and analyzed lawsuits filed against the Hammocks to advise Eric Thompson concerning their status.	0.30	\$150.00
08/16/2023	JJ	Prepared comprehensive electronic mail correspondence to Eric Thompson regarding analysis of cases filed against the Hammocks.	0.30	\$150.00
08/17/2023	JJ	Reviewed and analyzed multiple versions of the proposed cover letter for the reminder notice from FSR to residents.	0.30	\$150.00
08/17/2023	JJ	Prepared comprehensive electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding proposed revisions and analysis concerning the proposed cover letter to the FSR reminder notice to residents.	0.30	\$150.00
08/17/2023	JJ	Reviewed and analyzed electronic mail correspondence from Idalmen Ardisson to owners explaining the ACC process and addressing owner applications.	0.20	\$100.00
08/18/2023	JJ	Reviewed and analyzed proposed 2024 budget in preparation for Receiver's Budget meeting.	0.50	\$250.00
08/18/2023	JJ	Exchanged electronic mail correspondence with Melissa Vazquez	0.30	\$150.00

		from FSR regarding the proposed cover letter to owners enclosing their statements of account.		
08/18/2023	JJ	Attended Receiver's Hammocks Budget Meeting with Receiver Judge Gersten (ret.), Melissa Vazquez, Melanie Damian, and Eric Thompson regarding 2024 proposed budget, collection process, and friendly cover letter for statement of account encouraging owners to contact FSR to ensure their ledgers are accurate.	1.20	\$600.00
08/18/2023	JJ	Reviewed, analyzed, and revised the cover letter to the FSR Statement of Account going to all owners.	0.40	\$200.00
08/18/2023	JJ	Reviewed and analyzed governing documents to determine proper process for using Hammocks property for special parking agreements such as for boats and vehicles.	0.50	\$250.00
08/18/2023	JJ	Reviewed, analyzed, and revised proposed Clubhouse Rental Agreement.	0.50	\$250.00
08/18/2023	JJ	Exchanged electronic mail correspondence with Russell Landy regarding revisions to the proposed Clubhouse Rental Agreement.	0.10	\$50.00
08/18/2023	JJ	Prepared proposed Special Parking Area agreement for the Hammocks for review by Receiver Judge Gersten (ret.).	0.50	\$250.00
08/18/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) regarding approval of proposed Special Parking Area Agreement.	0.10	\$50.00
08/18/2023	JJ	Received and reviewed electronic mail correspondence approving cover letter for owner-wide communication concerning ledgers and current reported balances.	0.10	\$50.00
08/18/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) and Danilo Baptista regarding feedback received from owners at the 2023 Neighborhoods Committee meeting.	0.10	\$50.00
08/18/2023	JJ	Reviewed and analyzed report prepared by Danilo Baptistat regarding owner feedback at the Neighborhoods Committee meeting.	0.30	\$150.00
08/18/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among board members, FSR, and Receiver Judge Gersten (ret.) regarding various flooding and lighting issues at the Hammocks.	0.20	\$100.00
08/18/2023	JJ	Received and reviewed electronic mail correspondence from FSR regarding proposal from Dynamic Volt to address street lighting issues.	0.10	\$50.00
08/18/2023	JJ	Received and reviewed multiple electronic mail correspondence among board members, FSR, and Receiver Judge Gersten (ret.) regarding roof supplier update.	0.20	\$100.00
08/19/2023	JJ	Received and reviewed supporting documentation from Idalmen Ardisson regarding Special Parking Area Agreement.	0.20	\$100.00
08/19/2023	JJ	Attend to securing executed Special Parking Area Agreement and	0.30	\$150.00

		communicating same to Eric Thompson and Receiver Judge Gersten (ret.).		
08/19/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) regarding Miami Herald's Linda Robertson seeking comment for an upcoming story on the Hammocks.	0.10	\$50.00
08/19/2023	JJ	Received and reviewed multiple electronic mail correspondence from board members and receiver regarding resolution and reinstatement of account with the Miami-Dade County Police Department.	0.20	\$100.00
08/20/2023	JJ	Received and reviewed multiple electronic mail correspondence with FSR, Receiver Judge Gersten (ret.), and Melanie Damian regarding approval for a credit limit increase to ensure monthly expenses are covered.	0.10	\$50.00
08/20/2023	JJ	Exchanged electronic mail correspondence with Russell Landy regarding final version of the Clubhouse Rental Agreement.	0.10	\$50.00
08/21/2023	JJ	Attend review, analysis, and opinion to Receiver Judge Gersten (ret.) regarding recommendation on insurance to secure for the Hammocks including multiple communications with Eric Thompson.	1.00	\$500.00
08/21/2023	JJ	Electronic mail correspondence electing option on insurance coverage and requesting insurance be bound immediately.	0.20	\$100.00
08/21/2023	JJ	Received and reviewed electronic mail correspondence to Receiver Judge Gersten (ret.) from Donald Kearns enclosing link to the Miami Herald article about the Hammocks.	0.10	\$50.00
08/21/2023	JJ	Reviewed and analyzed Miami Herald article about the Hammocks where multiple board members were quoted.	0.40	\$200.00
08/21/2023	JJ	Received and reviewed electronic mail correspondence from Corey Tickeny confirming receipt of the approved and finalized Clubhouse Rental Agreement for use going forward with owners.	0.10	\$50.00
08/22/2023	JJ	Received and reviewed electronic mail correspondence from Corey Tickner to Receiver Judge Gersten (ret.) regarding media inquiry made by US Sun about the charges pending against the former board of directors.	0.10	\$50.00
08/22/2023	JJ	Received and reviewed update on Miami Herald article posting on the front page of the newspaper.	0.10	\$50.00
08/23/2023	JJ	Reviewed and analyzed comprehensive and detailed chain of communications among FSR and Receiver Judge Gersten (ret.) concerning various issues, owner complaints, and board member complaints to prepare a proposed response.	0.50	\$250.00
08/23/2023	JJ	Prepared legal opinion and recommendation for Receiver Judge Gersten (ret.) regarding manner in which to proceed with ACC applications improperly denied by FSR or a lack of following governing documents.	0.30	\$150.00
08/23/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding legal analysis	0.20	\$100.00

		on how to handle various FSR and association issues.		
08/23/2023	JJ	Reviewed and analyzed comprehensive response from Idalmen Ardisson to Corey Tickner expressing serious concerns that she would like addressed immediately.	0.20	\$100.00
08/23/2023	JJ	Electronic mail correspondence from Receiver Judge Gersten (ret.) instructing that going forward to carbon copy Idalmen Ardisson on all electronic mail correspondence with owners concerning an ACC application.	0.10	\$50.00
08/23/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson concerning FSR process for review of ACC applications.	0.10	\$50.00
08/23/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence from FSR, advisory board members, and Receiver Judge Gersten (ret.) regarding various issues concerning the lighting project.	0.30	\$150.00
08/23/2023	JJ	Reviewed and analyzed Receiver Judge Gersten (ret.) Motion for Order to Show Cause as to Sports Surfaces, LLC, for failure to appear at deposition.	0.30	\$150.00
08/24/2023	JJ	Reviewed and analyzed electronic mail correspondence from Carlos Villalobos and Marcoantonio Real incorrectly claiming the Official Rules of the Board of Directors violate the governing documents, Chapter 720, and their free speech rights.	0.50	\$250.00
08/24/2023	JJ	Prepared electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding analysis on letter received from Carlos Villalobos and Marcoantonio Real complaining the Official Rules of the Board of Directors violates their free speech rights.	0.50	\$250.00
08/24/2023	JJ	Electronic mail correspondence to the advisory board of directors enclosing the Official Rules of the Board of Directors.	0.10	\$50.00
08/24/2023	JJ	Received and reviewed multiple electronic mail correspondence from board members commenting on the Official Rules of the Board of Directors.	0.10	\$50.00
08/24/2023	JJ	Received and reviewed electronic mail correspondence from Pete Cabrera and Receiver Judge Gersten (ret.) regarding evidence of fence installations in the Hammocks by the prior board of directors without a permit.	0.10	\$50.00
08/25/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) regarding complaint made by advisory board members Carlos Villalobos and Marcoantonio Real accusing the Receiver Judge Gersten (ret.) of retaliating against them because of a Miami Herald article.	0.20	\$100.00
08/25/2023	JJ	Telephone conference with Eric Thompson regarding complaint made by advisory board members Carlos Villalobos and Marcoantonio Real against Receiver Judge Gersten (ret.).	0.80	\$400.00
08/25/2023	JJ	Second telephone conference with Eric Thompson regarding exchange of communications with Carlos Villalobos, Marcoantonio	0.20	\$100.00



		Real, and Todd Botner.		
08/25/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) with instructions on how to respond to the formal complaint and accusation of retaliation made by Carlos Villalobos and Marcoantonio Real.	0.10	\$50.00
08/25/2023	JJ	Electronic mail correspondence to Carlos Villalobos requesting additional information concerning the allegations made that the Official Rules of the Board of Directors violates free speech, violates the HOA Act, and retaliates against Carlos Villalobos and Marcoantonio Real for speaking with the Miami Herald.	0.10	\$50.00
08/25/2023	JJ	Electronic mail correspondence from Carlos Villalobos copying Marcoantonio Real and Todd Botner and quoting the purportedly offending language of the Official Rules of the Board of Directors.	0.10	\$50.00
08/25/2023	JJ	Legal research in preparation for response to Carlos Villalobos' clarification and quotation of offending language of the Official Rules of the Board of Directors.	0.20	\$100.00
08/25/2023	JJ	Reviewed and analyzed case file and prior communications with Carlos Villalobos to identify electronic mail correspondence and phone records where Carlos Villalobos was provided a copy of the proposed rules and asked to comment and evaluate the proposed rules with the Governing Documents Committee to which no response was received from Carlos Villalobos.	0.30	\$150.00
08/25/2023	JJ	Electronic mail correspondence to Carlos Villalobos detailing the reasons why the claim made by Carlos Villalobos, Marcoantonio Real, and Todd Botner about the Official Rules of the Board of Directors were completely incorrect and unfounded and the result of a misreading of the rules by Carlos Villalobos and others.	0.10	\$50.00
08/25/2023	JJ	Exchanged multiple electronic mail correspondence with Todd Botner wherein he questioned why he was being included in communications among the advisory board of directors.	0.20	\$100.00
08/25/2023	JJ	Exchanged electronic mail correspondence with Carlos Villalobos wherein he confirms that his concerns have been resolved and requested information about the posting of the Official Rules on the Hammocks website.	0.20	\$100.00
08/25/2023	JJ	Attend to posting of the Official Rules of the Board of Directors on the Hammocks website.	0.20	\$100.00
08/26/2023	JJ	Exchanged multiple emails with Kristen Gurucharri, Idalmen Ardisson, Jacqueline D Greenberg, and Receiver Judge Gersten (ret.) regarding meeting with CPA to go over Hammocks finances.	0.20	\$100.00
08/26/2023	JJ	Received and reviewed electronic mail correspondence from Don Kearns regarding owner tip that the prior board of directors had made a deal with Comcast and misappropriated the funds.	0.10	\$50.00
08/26/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) with legal opinion on how to proceed with owner tip concerning Comcast.	0.20	\$100.00

08/26/2023	JJ	Electronic mail correspondence to Pete Cabrera and Receiver Judge Gersten (ret.) regarding fence permit violations by the prior board of directors.	0.10	\$50.00
08/26/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among FSR, advisory board members, and Receiver Judge Gersten (ret.) regarding owner's complaint about another owner's lack of maintenance on their property.	0.50	\$250.00
08/26/2023	JJ	Reviewed and analyzed governing documents to determine process for handling owner complaints about lack of maintenance.	0.20	\$100.00
08/26/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson enclosing legal opinion on how to handle the owner complaint about another owner's lack of maintenance.	0.20	\$100.00
08/27/2023	JJ	Received and reviewed electronic mail correspondence concerning possible bulk deal with Comcast made by the prior board of directors.	0.10	\$50.00
08/28/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding owner complaint about exterminator entering private property.	0.10	\$50.00
08/28/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson concerning upcoming meetings of the Finance Committee.	0.10	\$50.00
08/28/2023	JJ	Telephone conference with Donald Kearns and Pete Cabrera concerning various legal issues and governance of the advisory board of directors.	0.90	\$450.00
08/28/2023	JJ	Reviewed and analyzed owner complaint about constant small planes noise and discussion among FSR and Receiver Judge Gersten (ret.).	0.20	\$100.00
08/29/2023	JJ	Received and reviewed electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) regarding approval of Miami-Dade Police Department permit bill payment.	0.10	\$50.00
08/29/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence from Idalmen Ardisson to Receiver Judge Gersten (ret.) concerning the finance committee.	0.10	\$50.00
08/29/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence between Idalmen Ardisson and Receiver Judge Gersten (ret.) regarding the Finance Committee.	0.20	\$100.00
08/29/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding details of the Finance Committee concerns and next steps.	0.10	\$50.00
08/29/2023	JJ	Reviewed and analyzed electronic mail correspondence from Receiver Judge Gersten (ret.) requesting updates and expediting of pool permits, fence issues, and drainage maintenance.	0.10	\$50.00
08/29/2023	JJ	Telephone conference with Danilo Baptista regarding updates and expediting of pool permits, fence issues, and drainage	0.30	\$150.00

		maintenance.		
08/29/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) enclosing updates on expediting of pool permits, fence issues, and drainage maintenance.	0.20	\$100.00
08/29/2023	JJ	Telephone conference with Eric Thompson regarding status update on formal complaint filed by Carlos Villalobos and Marcoantonio Real and concerns with the Finance Committee.	0.10	\$50.00
08/29/2023	JJ	Received and reviewed exchange of electronic mail correspondence with Receiver Judge Gersten (ret.) and Donald Kearns regarding proposed 2024 budget.	0.10	\$50.00
08/29/2023	JJ	Exchanged electronic mail correspondence with Donald Kearns regarding Hammocks committees.	0.30	\$150.00
08/29/2023	JJ	Received and reviewed multiple electronic mail correspondence concerning Miami Dade Bulk Waste Pickup.	0.10	\$50.00
08/30/2023	JJ	Telephone conference with Melanie Damian regarding tendering of the limits on the Directors and Officers Insurance Policy of \$2 million.	0.30	\$150.00
08/30/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence and pictures regarding the inspection of the drainage system at the Hammocks.	0.30	\$150.00
08/30/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among FSR, Idalmen Ardisson, and Receiver Judge Gersten (ret.) regarding roof tile samples for use by owners.	0.20	\$100.00
08/31/2023	JJ	Received and reviewed video posting by Donald Kearns regarding board governance.	0.10	\$50.00
08/31/2023	JJ	Telephone conference with Donald Kearns regarding board governance.	0.50	\$250.00
08/31/2023	JJ	Telephone conference with Jaqueline D. Greenberg in anticipation of organizational meeting of the Finance Committee.	0.10	\$50.00
08/31/2023	JJ	Electronic mail correspondence to Jacqueline D. Greenberg, CPA of the Finance Committee, enclosing a copy of the proposed 2024 budget for review and comments.	0.10	\$50.00
08/31/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and members of the Finance Committee.	0.20	\$100.00
08/31/2023	JJ	Reviewed and analyzed CPA's comments and revisions to the proposed 2024 budget and answered questions about certain entries.	0.30	\$150.00
08/31/2023	JJ	Attended organizational meeting with CPA Jacqueline D. Greenberg, Kristen Gurucharri, and Donald Kearns, and initial review of version 2 of the proposed 2024 budget.	1.00	\$500.00
08/31/2023	JJ	Prepared comprehensive electronic mail correspondence Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson	0.50	\$250.00

		regarding full status update on the outcome of the organizational meeting Kristen Gurucharri, Donald Kearns, and CPA Jacqueline D. Greenberg.		
08/31/2023	JJ	Electronic mail correspondence to FSR regarding posting of owner financial statement packages.	0.10	\$50.00
08/31/2023	JJ	Reviewed and analyzed electronic mail correspondence from Kristen Gurucharri highlighting an owner experience with FSR attempting to reconcile her ledger with payments made.	0.10	\$50.00
08/31/2023	JJ	Exchanged multiple electronic mail correspondence with Finance Committee regarding proposed 2024 budget.	0.10	\$50.00
08/31/2023	JJ	Exchanged numerous electronic mail correspondence Receiver Judge Gersten (ret.) and finance committee members regarding upcoming organizational meeting.	0.10	\$50.00
08/31/2023	JJ	Reviewed and analyzed comprehensive demand letter served on Hammocks by owner Guirola's attorney concernign the steel roof tiles installed on their home.	0.30	\$150.00
08/31/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson regarding Guirola complaint and demand letter concerning approval to install a metal roof.	0.10	\$50.00
08/31/2023	JJ	Reviewed and analyzed Order Granting Cepero's Motion for Relief from Receiver's Order.	0.10	\$50.00
			<b>Services Subtotal</b>	<b>\$19,400.00</b>

## Expenses

Date	Notes	Quantity	Rate	Total
08/15/2023	Reimbursements: Reimbursement - Zoom Meetings and Webinars	1.00	\$120.98	\$120.98
08/19/2023	Zoom - INV215517581 - Zoom One Pro, Webinar, and Cloud Storage	1.00	\$120.98	\$120.98
			<b>Expenses Subtotal</b>	<b>\$241.96</b>

Time Keeper	Position	Quantity	Rate	Total
Jesmany Jomarron	Senior Partner	38.8	\$500.00	\$19,400.00
			<b>Subtotal</b>	<b>\$19,641.96</b>
			<b>Total</b>	<b>\$19,641.96</b>

# Detailed Statement of Account

## Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
16	04/30/2023	\$35,875.00	\$11,565.00	\$24,310.00
18	04/30/2023	\$11,633.73	\$0.00	\$11,633.73
93	05/07/2023	\$118,737.70	\$0.00	\$118,737.70
562	09/07/2023	\$18,620.98	\$0.00	\$18,620.98

## Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
636	10/22/2023	\$19,641.96	\$0.00	\$19,641.96
<b>Outstanding Balance</b>				<b>\$192,944.37</b>
<b>Total Amount Outstanding</b>				<b>\$192,944.37</b>

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

Please pay within 30 days.



# INVOICE

Invoice # 663  
Date: 10/07/2023  
Due On: 11/06/2023

## 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
09/01/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among FSR, Receiver Judge Gersten (ret.), and Idalmen Ardisson regarding street lights project at the Hammocks.	0.20	\$100.00
09/06/2023	JJ	Reviewed and analyzed electronic mail correspondence regarding invoices due to the Miami-Dade Police Department and legal opinion to Eric Thompson and Receiver Judge Gersten (ret.) regarding payment for outstanding invoices.	0.40	\$200.00
09/06/2023	JJ	Received and reviewed electronic mail correspondence from Jacqueline D. Greenberg regarding budget timeline and upcoming availability to participate in meetings.	0.10	\$50.00
09/06/2023	JJ	Telephone conference with Melanie Damian	0.10	\$50.00

		regarding D&O Policy carrier tendering of policy limits of \$2,000,000 and need to secure consent and agreement from Ana Danton through her lawyer Michael Kaufman.		
09/06/2023	JJ	Telephone conference with Michael Kaufman regarding D&O Policy carrier tendering of policy limits of \$2,000,000 and agreement to secure approval from Judge Butchko.	0.50	\$250.00
09/06/2023	JJ	Reviewed and analyzed proposal for work at the pools of Wild Lime and Black Creek.	0.20	\$100.00
09/06/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Receiver Judge Gersten (ret.), Eric Thompson, and FSR regarding owner request for approval of metal roofs.	0.10	\$50.00
09/06/2023	JJ	Reviewed and analyzed Motion to Approve Settlement Agreement and Release with Certain Former Directors of the Hammocks.	0.40	\$200.00
09/11/2023	JJ	Zoom meeting with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson to discuss budget and various legal issues; portion of meeting with Alyson Theale and Melissa Vazquez reviewing and analyzing the budget.	1.30	\$650.00
09/11/2023	JJ	Exchanged multiple electronic mail correspondence with FSR regarding Hammocks website access.	0.20	\$100.00
09/11/2023	JJ	Exchanged multiple electronic mail correspondence with FSR regarding preparation of proposed 2024 budget for distribution and review by the Advisory Board of Directors and the Finance Committee.	0.20	\$100.00
09/11/2023	JJ	Reviewed analyzed multiple electronic mail correspondence exchanged among FSR and Receiver Judge Gersten (ret.) regarding maintenance of the common areas.	0.30	\$150.00
09/12/2023	JJ	Received and reiewed electronic mail correspondence from Kristen Gurucharri regarding owner complaint of improper painting of the fences in Chantarelle Raven Outer Wall.	0.10	\$50.00
09/12/2023	JJ	Received and reiewed electronic mail	0.20	\$100.00

		correspondence from Kristen Gurucharri forwarding additional and multiple owner complaints about the fence paint job at Chanterelle.		
09/12/2023	JJ	Telephone conference with Idalmen Ardisson regarding regarding various issues with the Architectural Control Committee and Finance Committee.	1.00	\$500.00
09/12/2023	JJ	Received and reviewed multiple electronic mail correspondence with Idalmen Ardisson addressed to FSR and Kristen Gurucharri concerning paint color of the fences in Chantarelle.	0.20	\$100.00
09/12/2023	JJ	Received and reviewed electronic mail correspondence from Corey Tickner regarding update on maintenance of the fences and decision behind paint color choice.	0.10	\$50.00
09/12/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among Idalmen Ardisson, Kristen Gurucharri, and FSR regarding sign at Chantarelle and other Neighborhood and Architectural Control Committee issues.	0.20	\$100.00
09/12/2023	JJ	Exchanged multiple electronic mail correspondence with Idalmen Ardisson and Kristen Gurucharri regarding upcoming Finance Committee meeting.	0.20	\$100.00
09/12/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among FSR, Receiver Judge Gersten (ret.), and Juan Franco concerning access by Cortland residents of Hammocks amenities.	0.30	\$150.00
09/12/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence between FSR and Idalmen Ardisson regarding approved roof tile samples.	0.10	\$50.00
09/12/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among Advisory Board members, FSR, and Receiver Judge Gersten (ret.) concerning Hammocks website displaying incorrect information about upcoming board meeting and need for immediate corrections.	0.20	\$100.00
09/13/2023	JJ	Reviewed and analyzed correspondence from	0.10	\$50.00



		Corey Tickner confirming future maintenance projects will run through the ACC first.		
09/13/2023	JJ	Reviewed and analyzed detailed and comprehensive electronic mail correspondence from board member concerning FSR and owner complaints.	0.10	\$50.00
09/13/2023	JJ	Received and reviewed multiple electronic mail correspondence from FSR and Receiver Judge Gersten (ret.) regarding approval of any painting of fences at the Hammocks.	0.10	\$50.00
09/13/2023	JJ	Received and reviewed multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and board members regarding procedure for approval of paint projects at the Hammocks.	0.10	\$50.00
09/13/2023	JJ	Received and reviewed multiple electronic mail correspondence among FSR, board members, and Receiver Judge Gersten (ret.) concerning signage at Chantarelle.	0.10	\$50.00
09/14/2023	JJ	Exchanged communications with Kristen Gurucharri and Idalmen Ardisson regarding upcoming Finance Committee meeting.	0.10	\$50.00
09/14/2023	JJ	Exchanged electronic mail correspondence with Jacqueline D. Greenberg, Finance Committee CPA, Receiver Judge Gersten (ret.), and Eric Thompson regarding the upcoming Finance Committee meeting.	0.10	\$50.00
09/14/2023	JJ	Received and reviewed multiple electronic mail correspondence from Receiver Judge Gersten (ret.) and Donald Kearns regarding owner complaints about FSR.	0.10	\$50.00
09/14/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) and Donald Kearns regarding various legal issues and owner complaints about FSR.	1.20	\$600.00
09/15/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among FSR and Receiver Judge Gersten (ret.) concerning approval of the proposed agenda for the meeting of the Advisory Board of Directors.	0.20	\$100.00

09/15/2023	JJ	Reviewed and analyzed file in preparation for telephone conference with Receiver Judge Gersten (ret.) and Eric Thompson.	0.30	\$150.00
09/15/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) and Eric Thompson regarding various legal issues in preparation for upcoming meeting of the Advisory Board of Directors.	1.50	\$750.00
09/15/2023	JJ	Revised and finalized proposed notice and agenda for meeting of the Advisory Board of Directors.	0.40	\$200.00
09/15/2023	JJ	Exchanged multiple communications with Finance Committee members confirming meeting time and place and attendance by CPA Jacqueline D. Greenberg.	0.30	\$150.00
09/15/2023	JJ	Zoom practice session and configuration.	0.30	\$150.00
09/15/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) and Adam Ruff enclosing unique Zoom link and instructions for logging in as a panelist during the meeting of the Advisory Board of Directors.	0.10	\$50.00
09/15/2023	JJ	Electronic mail correspondence to Eric Thompson enclosing unique Zoom link and instructions for logging in as a panelist during the meeting of the Advisory Board of Directors.	0.10	\$50.00
09/15/2023	JJ	Multiple telephone conferences and communications with Advisory Board members and committee members regarding meeting dates through 2024 for posting on the Hammocks website for the benefit of the owners.	0.50	\$250.00
09/15/2023	JJ	Electronic mail correspondence with Corey Tickner and Melissa Vazquez enclosing comprehensive list of committee meeting dates confirmed into 2024 for posting on the Hammocks website for the benefit of the owners.	0.30	\$150.00
09/15/2023	JJ	Reviewed and revised Hammocks Leadership Chart.	1.50	\$750.00
09/15/2023	JJ	Exchanged multiple electronic mail correspondence with Corey Tickner regarding updates to the Hammocks website and posting of	0.10	\$50.00

		the agenda for the meeting of the Advisory Board of Directors.		
09/15/2023	JJ	Received and reviewed multiple electronic mail correspondence from FSR and Idalmen Ardisson regarding owner ACC application.	0.20	\$100.00
09/16/2023	JJ	Revised and finalized Hammocks Leadership Cart.	1.20	\$600.00
09/16/2023	JJ	Received and reviewed electronic mail correspondence with FSR regarding upcoming Neighborhoods Committee meeting.	0.10	\$50.00
09/16/2023	JJ	Reviewed and analyzed drainage timeline of events and electronic mail correspondence from Eric Thompson and Receiver Judge Gersten (ret.).	0.10	\$50.00
09/16/2023	JJ	Reviewed and analyzed timeline of pool repairs project by FSR and upcoming opening dates.	0.10	\$50.00
09/16/2023	JJ	Exchanged numerous communications with Alyson Theale and Jean Carlos Peralta regarding updates to the website and leadership chart.	0.60	\$300.00
09/16/2023	JJ	Attend to publishing final list of committee members including multiple communications with Advisory Board members and committee members.	0.80	\$400.00
09/16/2023	JJ	Reviewed and analyzed update from Corey Tickner on the progress of the tree trimming project.	0.10	\$50.00
09/16/2023	JJ	Exchanged multiple electronic mail correspondence with FSR regarding updates to Hammocks website and posting of committee meeting times.	0.20	\$100.00
09/18/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) and FSR regarding satisfaction of outstanding balance with Miami-Dade Police Department.	0.10	\$50.00
09/18/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence with FSR regarding update on the sequence of events concerning the pool	0.10	\$50.00

		permit and repairs.		
09/18/2023	JJ	Exchanged multiple electronic mail correspondence with Carlos Villalobos regarding details of Governing Documents committee.	0.20	\$100.00
09/19/2023	JJ	Reviewed and analyzed proposed Receiver's Report for the meeting of the Advisory Board of Directors.	0.50	\$250.00
09/19/2023	JJ	Zoom practice session with Receiver Judge Gersten (ret.) and Eric Thompson in preparation for upcoming meeting of the Advisory Board of Directors.	1.70	\$850.00
09/19/2023	JJ	Second telephone conference Receiver Judge Gersten (ret.) in preparation for meeting of the Advisory Bard of Directors.	1.00	\$500.00
09/19/2023	JJ	In-person attendance at the meeting of the Advisory Board of Directors.	5.80	\$2,900.00
09/19/2023	JJ	Reviewed and analyzed approved minutes of the May 9, 2023, meeting of the advisory board of directors.	0.20	\$100.00
09/19/2023	JJ	Exchanged electronic mail correspondence with FSR regarding phone vendor.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed FirstService Residential - Association Management Contract to compile and produce to the Finance Committee.	0.20	\$100.00
09/20/2023	JJ	Reviewed and analyzed The Lake Doctors - Water Management Agreement to compile and produce to the Finance Committee.	0.20	\$100.00
09/20/2023	JJ	Reviewed and analyzed Coral Commerce - Lease Renewal 14355 # 101 (09-01-2023) to compile and produce to the Finance Committee.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed Elite Guard - Service Service Contract to compile and produce to the Finance Committee.	0.20	\$100.00
09/20/2023	JJ	Reviewed and analyzed Turf Management - Landscape Maintenance Agreement to compile and produce to the Finance Committee.	0.20	\$100.00

09/20/2023	JJ	Reviewed and analyzed Waste Connection of Florida - Container Removal Service Contract 04-24-2023 to compile and produce to the Finance Committee.	0.20	\$100.00
09/20/2023	JJ	Reviewed and analyzed Fitness Solution - Bi-Monthly Preventative Maintenance Agreement - Wild Lime Center to compile and produce to the Finance Committee.	0.20	\$100.00
09/20/2023	JJ	Reviewed and analyzed Florida Bright and Blue - Pool Service Contract 2023-03-09 to compile and produce to the Finance Committee.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed correspondence from Miami-Dade County concerning responsibility for perimeter fences at the Hammocks.	0.10	\$50.00
09/20/2023	JJ	Electronic mail correspondence to Kristen Gurucharri and Idalmen "Chicky" Ardisson enclosing contracts underlying the 2024 proposed Budget for consideration by the Finance Committee.	0.10	\$50.00
09/20/2023	JJ	Exchanged electronic mail correspondence with Corey Tickner regarding posting of Receiver's Report on the Hammocks website.	0.10	\$50.00
09/20/2023	JJ	Exchanged electronic mail correspondence with Melanie Damian regarding posting of Receiver's Reports on the Hammocks website.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed numerous electronic mail correspondence among Receiver Judge Gersten (ret.), Eric Thompson, Donald Kearns, and FSR concerning appeal by Mabelle Jaramillo of ACC decision.	0.30	\$150.00
09/20/2023	JJ	Exchanged multiple electronic mail correspondence with board members and Receiver Judge Gersten (ret.) regarding contract with Coral Commerce Center.	0.10	\$50.00
09/20/2023	JJ	Received and reviewed electronic mail correspondence concerning approval by Receiver Judge Gersten (ret.) of proposal to remove bee hive on a tree maintained by Hammocks and lake pump maintenance.	0.10	\$50.00

09/20/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding Oaklake ACC application.	0.10	\$50.00
09/20/2023	JJ	Received and reviewed multiple electronic mail correspondence from Idalmen Ardisson and FSR regarding appeal of ACC decision to Receiver Judge Gersten (ret.).	0.10	\$50.00
09/20/2023	JJ	Received and reviewed multiple electronic mail correspondence among FSR and Idalmen Ardisson regarding proposal from Dynamic Volt to address concerns with the street lights maintained by the Hammocks.	0.10	\$50.00
09/20/2023	JJ	Exchanged multiple electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding owner appeal of metal roofs decision.	0.20	\$100.00
09/20/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding DBPR's correspondence concerning the new election arbitration.	0.10	\$50.00
09/20/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding owner's delayed request for approval of hurricane shutters.	0.20	\$100.00
09/20/2023	JJ	Received and reviewed multiple electronic mail correspondence from FSR regarding posting of Owner Financial Report packages on the Hammocks website.	0.10	\$50.00
09/20/2023	JJ	Exchanged multiple communications with Pete Cabrera and Receiver Judge Gersten (ret.) regarding Miami-Dade County's listing as owner of the perimeter fences at the Hammocks.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed ADA lawsuit filed against Samowitz & Klein No. 2 for Kendall, LLC.	0.30	\$150.00
09/20/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten and Eric Thompson regarding review of ADA lawsuit filed against Samowitz & Klein No. 2 for Kendall, LLC.	0.10	\$50.00
09/20/2023	JJ	Reviewed and analyzed numerous electronic mail	0.30	\$150.00

		correspondence among board members concerning meeting with FSR and lake vendor.		
09/21/2023	JJ	Reviewed and analyzed electronic mail correspondence from Donald Kearns regarding outcome of the meeting of the advisory board of directors.	0.10	\$50.00
09/21/2023	JJ	Telephone conference with Receiver Judge Gersten (ret.) and Eric Thompson regarding various legal issues.	0.50	\$250.00
09/21/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding pending ADA lawsuit against a commercial property owner within the Hammocks.	0.10	\$50.00
09/21/2023	JJ	Telephone conference with Pete Cabrera regarding public records concerning common areas of the Hammocks.	0.50	\$250.00
09/21/2023	JJ	Reviewed and analyzed Miami-Dade County public records to determine Hammocks ownership of common areas and roads.	0.50	\$250.00
09/21/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding approval of ACC application.	0.10	\$50.00
09/21/2023	JJ	Telephone conference with Donald Kearns regarding outcome of advisory board of directors meeting and various legal concerns.	0.80	\$400.00
09/21/2023	JJ	Telephone conference with Idalmen Ardisson reviewing and analyzing multiple ACC applications and appeals by owners of ACC decisions.	0.60	\$300.00
09/21/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) and Eric Thompson regarding outstanding hurricane shutters owner ACC application.	0.10	\$50.00
09/21/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding potential new connection to the prior board.	0.10	\$50.00
09/21/2023	JJ	Exchanged electronic mail correspondence with	0.10	\$50.00

		Eric Thompson regarding outstanding estoppel request.		
09/21/2023	JJ	Exchanged electronic mail correspondence with FSR regarding exterminator in Oaklake.	0.10	\$50.00
09/21/2023	JJ	Received and reviewed electronic mail correspondence from Receiver Judge Gersten (ret.) regarding secret meeting held by the Governing Documents Committee.	0.10	\$50.00
09/21/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) regarding ACC approval of ACC application.	0.10	\$50.00
09/22/2023	JJ	Attend to various issues concerning proper protocol for approval of outstanding ACC applications.	0.30	\$150.00
09/22/2023	JJ	Received and reviewed electronic mail correspondence from Eric Thompson with notice of approval and determination form for review by Receiver Judge Gersten (ret.).	0.10	\$50.00
09/22/2023	JJ	Received and reviewed photos of Black Creek.	0.10	\$50.00
09/22/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding planned future absences from ACC and advisory board of directors meetings.	0.10	\$50.00
09/22/2023	JJ	Reviewed and analyzed multiple approvals of owner ACC applications.	0.20	\$100.00
09/25/2023	JJ	Reviewed and analyzed Rules of the Board of Directors, governing documents, and Florida Statutes applicable to the governance of committee meetings.	0.80	\$400.00
09/25/2023	JJ	Prepared first draft of Notice of Violation to Carlos Villalobos and Notice to Owners concerning same.	1.00	\$500.00
09/25/2023	JJ	Telephone conference with Eric Thompson reviewing and analyzing proposed proposed Notice of Violation and Notice to Owners.	0.90	\$450.00
09/25/2023	JJ	Exchanged communications with Donald Kearns regarding items on the proposed Agenda for the	0.20	\$100.00



		meeting of the Public Safety Committee.		
09/25/2023	JJ	Exchanged electronic mail correspondence with FSR regarding the proposed Agenda for Public Safety Committee.	0.20	\$100.00
09/25/2023	JJ	Revised and finalized proposed Agenda for Public Safety Committee for publishing on the Hammocks website.	0.20	\$100.00
09/25/2023	JJ	Exchanged multiple communications with Kristen Gurucharri and Idalmen Ardisson regarding proposed Agenda of the Finance Committee.	0.20	\$100.00
09/25/2023	JJ	Exchanged multiple communications with FSR regarding proposed Agenda of the Finance Committee.	0.20	\$100.00
09/25/2023	JJ	Revised and finalized proposed Agenda for Finance Committee for publishing on the Hammocks website.	0.20	\$100.00
09/25/2023	JJ	Exchanged multiple communications with Receiver Judge Gersten (ret.) and Eric Thompson regarding revisions to the Notice of Violation as to Carlos Villalobos.	0.20	\$100.00
09/25/2023	JJ	Subject: Re: Hammocks – Proposed Notice of Violation	0.10	\$50.00
09/25/2023	JJ	Exchanged electronic mail correspondence with FSR regarding update list of insurance companies insuring the Hammocks.	0.10	\$50.00
09/25/2023	JJ	Reviewed and analyzed list of insurance policies applicable to the Hammocks.	0.20	\$100.00
09/25/2023	JJ	Exchanged electronic mail correspondence with FSR regarding draft of meeting minutes from the last meeting of the advisory board of directors.	0.10	\$50.00
09/25/2023	JJ	Exchanged multiple communications with the Finance Committee regarding the proposed agenda, rules applicable to the governance of the committee meetings, and applicable insurance policies.	0.30	\$150.00
09/26/2023	JJ	Reviewed and analyzed comprehensive electronic mail correspondence concerning an estoppel	0.20	\$100.00

		request reflecting an allegedly erroneous balance.		
09/26/2023	JJ	Electronic mail correspondence to Eric Zimmerman, attorney for prior owner, request details of alleged missing payment.	0.10	\$50.00
09/26/2023	JJ	Received and reviewed electronic mail correspondence from Idalmen Ardisson regarding ongoing tree trimming project and identity of landscaping company.	0.10	\$50.00
09/26/2023	JJ	Exchagned comprehensive electronic mail correspondence with Jackie D. Greenberg and Receiver Judge Gersten (ret.) regarding upcoming Finance Committee meeting and enclosing documents for review in anticipation of the Finance Committee meeting.	0.30	\$150.00
09/26/2023	JJ	Exchanged electronic mail correspondence with FSR regarding outstanding meeting minutes.	0.10	\$50.00
09/26/2023	JJ	Exchanged electronic mail correspondence with FSR and Receiver Judge Gersten (ret.) regarding oath of office taken by the advisory board of directors.	0.10	\$50.00
09/26/2023	JJ	Exchanged communications with Eric Thompson regarding upcoming foreclosure trial.	0.10	\$50.00
09/26/2023	JJ	Reviewed and analyzed comprehensive exchange of electronic mail correspondence among FSR, Advisory Board of Directors, and Receiver Judge Gersten (ret.) concerning costs for electricity budgets for the Hammocks Neighborhoods.	0.30	\$150.00
09/27/2023	JJ	Reviewed and analyzed electronic mail correspondence from Jacqueline D. Greenberg concerning errors in the proposed 2024 Budget to be addressed by FSR.	0.40	\$200.00
09/27/2023	JJ	Electronic mail correspondence to Jacqueline D. Greenberg explaining process for distribution of copies of the budget to the owners.	0.10	\$50.00
09/27/2023	JJ	Electronic mail correspondence to Melissa Vazquez enclosing comments from Jacqueline D. Greenberg concerning an error in the proposed 2024 budget.	0.10	\$50.00

09/27/2023	JJ	Reviewed and analyzed electronic mail correspondence from Melissa Vazquez enclosing revised proposed 2024 Budget and confirming the Hammocks website would be updated.	0.10	\$50.00
09/27/2023	JJ	Reviewed and analyzed revised 2024 proposed budget.	0.40	\$200.00
09/27/2023	JJ	Electronic mail correspondence to Jacqueline D. Greenberg concerning revisions to the 2024 proposed budget.	0.10	\$50.00
09/27/2023	JJ	Comprehensive electronic mail correspondence to Kristen Gurucharri and Idalmen Ardisson enclosing revised 2024 proposed budget and explaining the error within the budget and how it was resolved.	0.30	\$150.00
09/27/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) confirming revisions to the 2024 proposed budget and communications to the Finance Committee and owners.	0.10	\$50.00
09/27/2023	JJ	Exchanged electronic mail correspondence with Jacqueline D. Greenberg in preparation for upcoming Finance Committee meeting.	0.20	\$100.00
09/27/2023	JJ	Exchanged electronic mail correspondence with Melanie Damian, Eric Thompson, and Receiver Judge Gersten (ret.) regarding revisions to the Notice of Violations directed against Carlos Villalobos.	0.20	\$100.00
09/27/2023	JJ	Revised proposed Notice of Violation Directed Against Carlos Villalobos and corresponding Notice to Owners.	0.80	\$400.00
09/27/2023	JJ	Performed legal research on civil remedy notices in preparation for telephone conference with Kenneth Dante Murena and Cassandra Murena.	0.30	\$150.00
09/27/2023	JJ	Telephone conference with Kenneth Dante Murena and Cassandra Murena regarding analysis and strategy for service of Civil Remedy Notice on Crime Insurance Carrier and demand letter with proposed Complaint.	0.20	\$100.00
09/27/2023	JJ	Attendance at Public Safety Committee meeting.	1.80	\$900.00

09/27/2023	JJ	Attendance at Finance Committee meeting.	3.50	\$1,750.00
09/27/2023	JJ	Received and reviewed electronic mail correspondence from Alyson Theale regarding Finance Committee meetings.	0.10	\$50.00
09/27/2023	JJ	Telephone conference with Alyson Theale regarding upcoming Finance Committee meeting.	0.20	\$100.00
09/27/2023	JJ	Exchanged electronic mail correspondence with Kenneth Dante Murena regarding demand letter against crime insurance policy carrier.	0.10	\$50.00
09/27/2023	JJ	Received and reviewed multiple electronic mail correspondence among Finance Committee members and FSR concerning attendance by Melissa Vazquez at the upcoming Finance Committee meeting to answer question about the budget.	0.20	\$100.00
09/27/2023	JJ	Received and reviewed multiple electronic mail correspondence among Eric Thompson and FSR enclosing multiple executed ACC determination form for owners' ACC applications.	0.10	\$50.00
09/27/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among ACC members concerning absence of Idalmen Ardisson at upcoming ACC meeting and appointment of alternate and chair for the next meeting.	0.20	\$100.00
09/28/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson regarding requested revisions to the Notice of Violation to Carlos Villalobos.	0.20	\$100.00
09/28/2023	JJ	Reviewed and revised Notice of Violation to Carlos Villalobos.	0.40	\$200.00
09/28/2023	JJ	Reviewed and analyzed proposed demand letter against Philadelphia Indemnity Insurance Company enclosing proposed lawsuit for failure to tender limits on Crime Protection Plus Insurance Policy for thefts by prior board of directors.	0.30	\$150.00
09/28/2023	JJ	Telephone conference with Kenneth Dante Murena and Cassandra Murena regarding proposed demand letter against Philadelphia Indemnity Insurance Company and process for	0.20	\$100.00

		filing Civil Remedy Notice and lawsuit against the insurance company.		
09/29/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Kristen Gurucharri, FSR, and the Receiver Judge Gersten (ret.) concerning owner running an auto body shop from his driveway.	0.10	\$50.00
09/29/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among FSR, advisory board members, and Receiver Judge Gersten (ret.) concerning tree trimming performed by FDOT on Hammocks Blvd and the potential liability presented due to uneven cutting.	0.20	\$100.00
09/29/2023	JJ	Prepared comprehensive electronic mail correspondence Receiver Judge Gersten (ret.), Melanie Damian, and Eric Thompson regarding research on Hammocks common areas according to official public records and proposed response to FSR concerning FDOT tree trimming project.	0.70	\$350.00
09/29/2023	JJ	Exchanged multiple electronic mail correspondence with advisory board members and Finance Committee CPA concerning owner concerns and process for review by Receiver Judge Gersten (ret.).	0.20	\$100.00
09/29/2023	JJ	Comprehensive electronic mail correspondence to FSR concerning process for responding to owner questions about the budget and posting on the Hammocks website.	0.30	\$150.00
09/29/2023	JJ	Electronic mail correspondence to FSR from Receiver Judge Gersten (ret.) approving for posting on the Hammocks website information concerning FDOT's tree trimming project along Hammocks Blvd.	0.10	\$50.00
09/29/2023	JJ	Exchanged communications with Pete Cabrera regarding research on Hammocks title to common areas.	0.10	\$50.00
09/29/2023	JJ	Exchanged electronic mail correspondence with Don Kearns regarding status on approval of ACC applications.	0.10	\$50.00
09/29/2023	JJ	Electronic mail correspondence to Receiver Judge	0.10	\$50.00

		Gersten (ret.) and Eric Thompson regarding status of ACC applications and actions taken by FSR to notify the owners.		
09/29/2023	JJ	Reviewed and analyzed proposed breach of contract complaint against Philadelphia Indemnity Insurance Company for failure to tender limits on Crime Protection Plus Insurance Policy for thefts by prior board of directors.	0.40	\$200.00
09/29/2023	JJ	Electronic mail correspondence to Receiver Judge Gersten (ret.) and Kenneth Dante Murena approving proposed lawsuit against Philadelphia Indemnity Insurance Company for failure to tender limits on Crime Protection Plus Insurance Policy for thefts by prior board of directors.	0.10	\$50.00
09/29/2023	JJ	Reviewed and analyzed budget questions raised by Katherine Johnson and reply from Donald Kearns.	0.20	\$100.00
09/29/2023	JJ	Reviewed and analyzed multiple electronic mail correspondence among Donald Kearns, owner, and FSR concerning FPL bills for Oakwood Estates.	0.20	\$100.00
09/29/2023	JJ	Reviewed and analyzed multiple comprehensive electronic mail correspondence among FSR, Receiver Judge Gersten (ret.), and owners of Royal Palm Palace regarding request for temporary use of the Black Creek parking lot while they renovate their parking lot.	0.30	\$150.00
09/29/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Kenneth Dante Murena regarding approval of proposed demand letter and complaint against Crime Insurance Policy Carrier.	0.10	\$50.00
09/29/2023	JJ	Exchanged electronic mail correspondence with Receiver Judge Gersten (ret.) and Eric Thompson regarding outstanding owner ACC applications.	0.10	\$50.00
09/29/2023	JJ	Received and reviewed executed Order to Show Cause as Sport Surfaces, LLC.	0.10	\$50.00
<b>Services Subtotal</b>				<b>\$28,050.00</b>

**Expenses**

Date	Notes	Quantity	Rate	Total
09/19/2023	Zoom One Pro, Webinar, and Cloud Storage	1.00	\$120.98	\$120.98
09/27/2023	Zoom Upgrade to Accommodate Public Safety and Finance Committee Meetings.	1.00	\$15.99	\$15.99
<b>Expenses Subtotal</b>				<b>\$136.97</b>
<b>Subtotal</b>				<b>\$28,186.97</b>
<b>Total</b>				<b>\$28,186.97</b>

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 #10224 - 07/31/23**

## TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	16.80	428.00	7,190.40
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	1.70	450.00	765.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	7.70	360.00	2,772.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	0.10	450.00	45.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	20.60	290.00	5,974.00
TOTAL	<u>46.90</u>		<u>\$16,746.40</u>
	<b>BLENDED RATE</b>	<b>\$357.07</b>	
	DISCOUNT( 17%*)		(2,709.19)
	TOTAL EXPENSES		<u>3,028.88</u>
TOTAL AMOUNT OF THIS INVOICE			<u>\$17,066.09</u>
	ADJUSTED BLENDED RATE	\$299.30	

\* 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](http://www.kapilamukamal.com)





# 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: 10224

07/31/2023

Client ID: 90156

For Professional Services Rendered Through July 31, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
07/05/2023	SKB	REVIEW AND ANALYZE POP-1164 BANK DOCUMENTS TO UPLOAD TO VALID8.	1.80	770.40
07/05/2023	MMD	RESPOND TO EMAIL FROM COUNSEL RE PPP APPLICATIONS.	0.30	135.00
07/05/2023	FDD	ANALYZE BANK RECORDS AND EXTRACT RELEVANT DATA TO SEND TO VALID8 FOR CONVERSION INTO DATABASE FORMAT.	2.10	756.00
07/06/2023	FDD	T/C WITH VALID8 RE: BANK RECONSTRUCTION.	0.70	252.00
07/06/2023	SKB	TRAINING CALL WITH VAILD8 SUPPORT TEAM TO UPLOAD AND PROCESS DOCUMENTS.	0.50	214.00
07/06/2023	SKB	REVIEW AND ANALYZE POPULAR BANK PRODUCTION AND UPDATE BANK INVENTORY AND BANK RECONSTRUCTION ACCORDINGLY.	0.90	385.20
07/06/2023	FDD	ANALYZE BANK RECORDS AND EXTRACT RELEVANT DATA TO SEND TO VALID8 FOR CONVERSION INTO DATABASE FORMAT (CONTINUED).	1.70	612.00
07/07/2023	FDD	UPLOAD BANK DATA TO VALID8 FOR FURTHER ANALYSIS.	0.80	288.00
07/07/2023	SKB	PARTICIPATE IN T/C WITH VALID8 TECHNICAL SUPPORT TO UPLOAD AND ANALYZE BANK DOCUMENTS.	0.90	385.20
07/07/2023	SKB	CONTINUE TO REVIEW AND ANALYZE POPULAR BANK PRODUCTION AND UPDATE BANK INVENTORY AND BANK RECONSTRUCTION ACCORDINGLY.	2.60	1,112.80
07/07/2023	FDD	UPLOAD BANK DATA TO VALID8 FOR FURTHER ANALYSIS (CONTINUED).	1.00	360.00
07/10/2023	SKB	REVIEW AND ANALYZE 7/9/2023 DOCUMENT PRODUCTION WITH GALCERAN AUTO ELECTRIC DOCUMENTS AND REGIONS BANK DOCUMENT PRODUCTION FOR EXCELLENT SERVICES, JUGY'S AND ENDLESSLY HANDY BANK RECORDS.	0.80	342.40
07/10/2023	SKB	REVIEW STATUS OF VALID8 RECORDS TO RECONCILE TO BANK STATEMENTS.	0.60	256.80
07/10/2023	JLP	REVIEW AND ANALYZE NEWLY OBTAINED DOCUMENTS PERTAINING TO EXCELLENT SERVICES, ENDLESSLY HANDY, AND JUGY'S. UPDATE BANK INVENTORY SCHEDULE BASED ON NEWLY OBTAINED FINANCIAL DOCUMENTS	0.60	174.00
07/10/2023	FDD	ANALYZE BANK RECORDS AND EXTRACT DATA TO SEND TO VALID8 CONVERSION INTO DATABASE FORMAT.	0.30	108.00

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07/11/2023	SKB	DRAFT EMAIL OF STATUS UPDATE TO SARA KLEIN AND S. KAPILA REGARDING UPLOADS TO VALID8.	0.60	256.80
07/11/2023	MMD	REVIEW STATUS OF BANK RECONSTRUCTIONS.	0.20	90.00
07/12/2023	MMD	DRAFT STATUS REPORT NARRATIVE.	0.20	90.00
07/12/2023	SRK	INTERIM REPORT TO RECEIVER	0.10	45.00
07/13/2023	JLP	UPDATE BANK INVENTORY SCHEDULE BASED ON NEWLY PROVIDED BANK DOCUMENTS FOR ENDLESSLY HANDY, EXCELLENT SERVICE, AND JUGYS CLEANING SERVICES	0.50	145.00
07/13/2023	JLP	PREPARE ANALYZE BANK RECORDS FOR ENDLESSLY HANDY, ENDLESS SERVICES, AND JUGYS CLEANING SERVICE AND EXTRACT DATA TO SEND TO VALID8 FOR CONVERSION INTO DATABASE FORMAT.	0.70	203.00
07/18/2023	SKB	PREPARE BANK RECONSTRUCTION OF JUGY'S, EXCELLENT SERVICES, AND ENDLESSLY HANDY REGIONS BANK DOCUMENTS USING VALID8.	1.30	556.40
07/19/2023	SKB	PARTICIPATE IN VALID8 CALL FOR BANK RECONSTRUCTIONS.	1.40	599.20
07/19/2023	FDD	REFINE CHECK IMAGE DATA IN VALID8 FOR ANALYSIS AND RECONSTRUCTION.	1.10	396.00
07/20/2023	SKB	REVIEW AND REVISE BANK INVENTORY TO IDENTIFY STATEMENTS AND SUPPORT TO INCLUDE IN RECONSTRUCTION THROUGH VALID8 AND UPLOAD DOCUMENTS TO VALID8.	1.80	770.40
07/21/2023	SKB	T/C WITH VALID8 REGARDING CATEGORY AND ALPHA SORT COLUMNS FOR BANK RECONSTRUCTION.	0.20	85.60
07/21/2023	SKB	PREPARE BANK RECONSTRUCTION FOR ALL HAMMOCKS BANK ACCOUNTS TO INCLUDE DEPOSIT ACTIVITY USING VALID8 AND INCLUDE CATEGORIES AND ALPHA SORTS.	2.20	941.60
07/21/2023	JLP	REVIEW AND ANALYSIS OF DATA TO BE UPLOADED INTO VALID8 SOFTWARE	0.70	203.00
07/24/2023	SKB	REVIEW AND COMPILE DEPOSIT SUPPORT TO UPLOAD TO VALID8.	0.40	171.20
07/24/2023	MMD	COMPILE EMAIL TO COUNSEL MELANIE DAMIAN WITH SCHEDULES OF FALSE VENDOR PAYMENTS, INSIDER EMPLOYEES AND LEGAL FEES PAID.	1.00	450.00
07/24/2023	JLP	ANALYZE BANK RECORDS AND DEPOSIT SUPPORT DOCUMENTS FOR HAMMOCK COMMUNITY ASSOCIATION AND EXTRACT DATA TO UPLOAD TO VALID8 FOR PURPOSES OF RECONSTRUCTING HOMEOWNER DEPOSITS.	3.80	1,102.00
07/24/2023	JLP	UPDATE BANK INVENTORY SCHEDULE BASED ON MISSING SUPPORT IDENTIFIED	0.20	58.00
07/26/2023	SKB	PREPARE BANK RECONSTRUCTION FOR ALL HAMMOCKS BANK ACCOUNTS TO INCLUDE DEPOSIT ACTIVITY USING VALID8 AND INCLUDE CATEGORIES AND ALPHA SORTS.	0.80	342.40
07/26/2023	JLP	BEGIN UPLOADING CORRESPONDING DATA FILES OF HAMMOCK COMMUNITY ASSOCIATION BANK ACCOUNTS INTO VALID8 FOR PURPOSES OF RECONSTRUCTING HOMEOWNER DEPOSITS.	3.60	1,044.00
07/28/2023	JLP	DOWNLOAD NEWLY OBTAINED BANK DOCUMENTS PERTAINING	0.60	174.00

		TO HAMMOCK COMMUNITY ASSOCIATION AND UPDATE BANK INVENTORY ACCORDINGLY		
07/28/2023	JLP	UPLOAD AND ANALYZE DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS FOR PURPOSES OF RECONSTRUCTING HOMEOWNER DEPOSITS.	3.10	899.00
07/31/2023	JLP	UPLOAD AND ANALYZE 2020 DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS. REVIEW DEPOSIT TRANSACTION ACTIVITY AND IDENTIFY CORRESPONDING DEPOSIT TICKETS AND SUPPORT FOR PURPOSES OF RECONSTRUCTING 2020 HOMEOWNER DEPOSITS.	1.60	464.00
07/31/2023	JLP	UPLOAD AND ANALYZE 2021 DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS. REVIEW DEPOSIT TRANSACTION ACTIVITY AND IDENTIFY CORRESPONDING DEPOSIT TICKETS AND SUPPORT FOR PURPOSES OF RECONSTRUCTING 2021 HOMEOWNER DEPOSITS.	1.90	551.00
07/31/2023	JLP	UPLOAD AND ANALYZE 2022 DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS. REVIEW DEPOSIT TRANSACTION ACTIVITY AND IDENTIFY CORRESPONDING DEPOSIT TICKETS AND SUPPORT FOR PURPOSES OF RECONSTRUCTING 2022 HOMEOWNER DEPOSITS.	1.50	435.00
07/31/2023	JLP	UPLOAD AND ANALYZE 2019 DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS. REVIEW DEPOSIT TRANSACTION ACTIVITY AND IDENTIFY CORRESPONDING DEPOSIT TICKETS AND SUPPORT FOR PURPOSES OF RECONSTRUCTING 2019 HOMEOWNER DEPOSITS.	1.80	522.00
				16,746.40
				16,746.40
EXPENSES				
07/31/2023	EXP	SHAREFILE - JULY 2023		4.43
07/31/2023	EXP	VALID8 FINANCIAL, INC. - INVOICE #1880		3,024.45
				3,028.88
				3,028.88

Discount (2,709.19)

Total amount of this invoice \$17,066.09

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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

# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

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

**Client ID: 90156**

**Invoice #10325 - 08/31/23**

## TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	25.40	428.00	10,871.20
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	14.20	450.00	6,390.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	1.30	360.00	468.00
KJJ - KY JOHNSON - PARAPROFESSIONAL	7.50	196.00	1,470.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	26.70	290.00	7,743.00
TOTAL	<u>75.10</u>		<u>\$26,942.20</u>
	<b>BLENDDED RATE</b>	<b>\$358.75</b>	
	DISCOUNT (17%)*		(3,493.87)
	TOTAL EXPENSES		<u>1,777.72</u>
TOTAL AMOUNT OF THIS INVOICE			<u>\$25,226.05</u>
	ADJUSTED BLENDDED RATE	\$312.23	

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



# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

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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: 10325

08/31/2023

Client ID: 90156

For Professional Services Rendered Through August 31, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
08/01/2023	JLP	UPLOAD AND ANALYZE DATA FILES WITHIN VALID8 SOFTWARE AS PART OF BANK RECONSTRUCTION ANALYSIS. REVIEW DEPOSIT TRANSACTION ACTIVITY AND IDENTIFY CORRESPONDING DEPOSIT TICKETS AND SUPPORT	2.30	667.00
08/01/2023	JLP	REVIEW AND ANALYZE NEWLY RECEIVED CHASE BANK PRODUCTION FILES. UPDATE BANK INVENTORY BASED ON NEWLY RECEIVED BANK STATEMENTS AND SUPPORTING FILES	1.70	493.00
08/02/2023	MMD	ATTEND TO PREPARE RECONSTRUCTIONS OF HOMEOWNER DE POSTS FOR FINANCIAL STATEMENTS.	2.70	1,215.00
08/04/2023	JLP	REVIEW AND RESEARCH CORRESPONDING BLANK DEPOSIT TICKETS UPLOADED INTO VALID8. IDENTIFY TRANSACTION DATES AND AMOUNTS	0.30	87.00
08/04/2023	JLP	RECONCILE DEPOSIT DETAIL TRANSACTIONS TO APPROPRIATE DEPOSIT TICKETS AND DEPOSIT SUPPORT FOR PURPOSES OF RECONSTRUCTING HOMEOWNERS DEPOSITS.	4.10	1,189.00
08/08/2023	SKB	REVIEW AND ANALYZE DOCUMENT PRODUCTION OF CHAUCA AND GHILARDI BANK DOCUMENTS TO INCLUDE IN RECONSTRUCTION OF RELATED PARTY BANK ACCOUNTS.	1.10	470.80
08/09/2023	MMD	COMPILE FINANCIAL INFORMATION REQUESTED BY COUNSEL FOR CRIME POLICY CLAIM.	1.80	810.00
08/09/2023	MMD	REVIEW EMAILS AND SHAREFILE ROOM FOR SUPPORTING DOCUMENTS FOR CRIME POLICY CLAIM AND SEND TO COUNSEL.	1.20	540.00
08/10/2023	SKB	UPLOAD CHAUCA AND GHILARDI BANK STATEMENTS AND SUPPORT TO VALID8 TO PREPARE BANK RECONSTRUCTION OF ACTIVITY IN RELATED PARTY ACCOUNTS.	0.50	214.00
08/14/2023	SKB	REVIEW AND ANALYZE TRUIST BANK PRODUCTION FROM 8/14/2023 TO DETERMINE WHETHER TO RECONSTRUCT AND UPDATE VALID8 DOCUMENTS ACCORDINGLY.	0.60	256.80
08/14/2023	KJJ	REVIEW AND COMPILE INDEX OF COMPLEX DOCUMENTS RECEIVED FROM TRUIST BANK (19 ACCOUNTS).	3.50	686.00
08/15/2023	SKB	PREPARE MISSING BANK RECORDS LIST AND UPDATE MASTER BANK INVENTORY.	1.80	770.40
08/15/2023	SKB	REVIEW AND ANALYZE GHILARDI, CHAUCA AND OTHER RELATED PARTY BANK RECONSTRUCTIONS TO TRACE FUNDS.	2.30	984.40

08/16/2023	FDD	ANALYZE BANK RECONSTRUCTION FOR GHILARDI AND CHAUCA.	0.90	324.00
08/16/2023	SKB	UPDATED HAMMOCKS BANK RECONSTRUCTIONS WITH RECENT TRUIST BANK PRODUCTION OF STATEMENTS AND SUPPORT FOR VARIOUS ACCOUNTS USING VALID8.	1.70	727.60
08/16/2023	SKB	UPDATE RELATED PARTY BANK RECONSTRUCTIONS WITH RECENT PRODUCTIONS FROM CHASE AND REGIONS BANKS USING VALID8 TO PREPARE TRACING ANALYSIS.	3.30	1,412.40
08/16/2023	KJJ	PREPARE RELATED PARTY BANK ACTIVITY FOR CSV FILES TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION - JPMC ACCT #1811	0.70	137.20
08/16/2023	KJJ	PREPARE RELATED PARTY BANK ACTIVITY FOR CSV FILES TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION - JPMC ACCT #4111	0.40	78.40
08/16/2023	KJJ	PREPARE RELATED PARTY BANK ACTIVITY FOR CSV FILES TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION - JPMC ACCT #7898	2.50	490.00
08/16/2023	KJJ	PREPARE HAMMOCKS BANK STATEMENTS, SUPPORT, AND CSV FILES TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION - TRUIST ACCT #0426	0.20	39.20
08/16/2023	KJJ	PREPARE HAMMOCKS BANK STATEMENTS, SUPPORT, AND CSV FILES TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION - TRUIST ACCT #1151	0.20	39.20
08/17/2023	FDD	ANALYZE BANK RECONSTRUCTION FOR GHILARDI AND CHAUCA (CONTINUED).	0.40	144.00
08/17/2023	SKB	UPDATE CHAUCA/GHILARDI BANK RECONSTRUCTIONS TO PREPARE TRACING ANALYSIS FOR MORTGAGE ON HOME.	0.50	214.00
08/17/2023	SKB	PREPARE CSV FORMATTED FILES FOR TRUIST ACCOUNTS TO UPDATE HAMMOCKS BANK RECONSTRUCTION WITH NEW DOCUMENTS PRODUCED.	0.50	214.00
08/21/2023	SKB	REVIEW AND REVISE BANK RECONSTRUCTION FOR GHILARDI/CHAUCA BANK ACCOUNTS TO PREPARE TRACING OF FUNDS USED TO PURCHASE HOME.	0.80	342.40
08/21/2023	JLP	RESEARCH AND IDENTIFY DEPOSIT AMOUNT AND DEPOSIT DATE FOR TRANSACTIONS REQUIRING FURTHER INVESTIGATION WITHIN VALID8 PROGRAM	0.50	145.00
08/21/2023	JLP	ANALYZE BANK RECORDS AND PREPARE COMBINED RECONSTRUCTION OF BANKING ACTIVITY FOR BRIAN CHAUCA, DANTE CHAUCA LLC, AND MONICA GHILARDI, ACCOUNTS #9261, #3665, AND #8522, FROM THE PERIOD OF DECEMBER 2018 THROUGH JUNE 2023.	6.60	1,914.00
08/22/2023	SKB	CONTINUE TO REVIEW AND REVISE BANK RECONSTRUCTION FOR GHILARDI/CHAUCA BANK ACCOUNTS TO PREPARE TRACING OF FUNDS USED TO PURCHASE HOME.	2.30	984.40
08/22/2023	MMD	REVIEW AND REVISE TRACING ANALYSIS FOR HAMMOCKS MORTGAGE.	0.80	360.00
08/22/2023	JLP	PREPARE ALPHA SORT, CATEGORIES, AND PIVOT FOR BRIAN CHAUCA, DANTE CHAUCA LLC, AND MONICA GHILARDI BANK RECONSTRUCTION	1.90	551.00

08/23/2023	SKB	CONTINUE TO REVIEW AND REVISE BANK RECONSTRUCTION FOR GHILARDI BANK ACCOUNTS TO PREPARE TRACING OF FUNDS USED TO PURCHASE HOME.	2.50	1,070.00
08/23/2023	SKB	CONTINUE TO REVIEW AND REVISE BANK RECONSTRUCTION FOR CHAUCA BANK ACCOUNTS TO PREPARE TRACING OF FUNDS USED TO PURCHASE HOME.	2.40	1,027.20
08/23/2023	JLP	PREPARE TRACING ANALYSIS SCHEDULE BASED ON BANK ACTIVITY IDENTIFIED WITHIN MONICA GHILARDI, BRAIN CHAUCA, AND DANTE CHAUCA LLC BANK RECONSTRUCTION	4.20	1,218.00
08/25/2023	SKB	FINALIZE TRACING ANALYSIS OF FUNDS USED FOR MORTGAGE PAYMENTS TOWARDS GHILARDI'S HOME.	0.30	128.40
08/25/2023	MMD	CONTINUE TO PREPARE TRACING ANALYSIS FOR MORTGAGE PAYMENTS.	1.40	630.00
08/25/2023	JLP	RESEARCH AND RECONCILIATION OF TRANSACTIONS UNABLE TO BE MATCHED WITHIN VALID8	1.60	464.00
08/28/2023	JLP	RESEARCH AND RECONCILIATION OF TRANSACTIONS UNABLE TO BE MATCHED WITHIN VALID8	2.90	841.00
08/29/2023	SKB	PARTICIPATE IN T/C WITH RUSSELL LANDY, CHRIS PERSE AND M. DAVIS REGARDING TRACING OF FUNDS PAID TO MORTGAGE.	0.50	214.00
08/29/2023	SKB	CONTINUE TO PREPARE TRACING OF FUNDS FOR GHILARDI/CHAUCA BANK ACCOUNTS TO IDENTIFY DEBTOR FUNDS USED TO PURCHASE HOME.	3.70	1,583.60
08/29/2023	MMD	ATTEND TC WITH COUNSEL RE TARGETS, DAMAGES AND TRACING ANALYSIS.	1.00	450.00
08/29/2023	MMD	COMPILE DAMAGES SCHEDULES FOR COUNSEL FOR USE IN MALPRACTICE MATTERS.	1.40	630.00
08/29/2023	MMD	CONTINUE TO PREPARE LIBR TRACING FOR MORTGAGE PAYMENTS AND OTHER USES OF HAMMOCKS FUNDS.	2.60	1,170.00
08/30/2023	SKB	REVIEW AND REVISE VALID8 TO MATCH TRANSACTIONS IN PREPARATION OF BANK RECONSTRUCTION.	0.60	256.80
08/30/2023	JLP	RESEARCH AND RECONCILIATION OF TRANSACTIONS UNABLE TO BE MATCHED WITHIN VALID8	0.60	174.00
08/31/2023	MMD	FINALIZE TRACING OF USES OF HAMMOCKS FUNDS BY ALBRI AND GHILARDI AND MORTGAGE PAYMENT ANALYSIS. SEND TO COUNSEL.	1.30	585.00
				26,942.20
				26,942.20
EXPENSES				
08/31/2023	EXP	SHAREFILE - AUGUST 2023		4.42
08/31/2023	EXP	VALID8 FINANCIAL, INC. - INVOICE #1932		1,773.30



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1,777.72

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1,777.72

Discount (3,493.87)

Total amount of this invoice \$25,226.05

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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: 954-768-4000  
Fax: 954-768-4017

Bank ABA Routing: 071000152

Swift Code: CNORUS44

Account Name: KAPILAMUKAMAL, LLP

Account Number: 3802463544

BEFORE PROCESSING THE WIRE, YOU MUST CALL AND  
VERBALLY CONFIRM THESE WIRE INSTRUCTIONS WITH  
KAPILAMUKAMAL

# Kapila Mukamal

CPAs, Forensic and Insolvency Advisors

EIN #46-5394135

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

**Client ID: 90156**

**Invoice #10390 - 09/30/23**

## TIME SUMMARY BY STAFF

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
SKB - SURUCHI BANEZ - PRINCIPAL CPA, CIRA, CFE	43.00	428.00	18,404.00
MMD - MELISSA DAVIS - PARTNER CPA, CIRA, CFE	5.80	450.00	2,610.00
FDD - FRANK DIAZ-DRAGO - CONSULTANT	1.60	360.00	576.00
KJJ - KY JOHNSON - PARAPROFESSIONAL	1.50	196.00	294.00
SRK - SONEET KAPILA - PARTNER CPA, CFF, CIRA, CFE	0.40	450.00	180.00
JLP - JOEL PATHIYIL - CONSULTANT CPA	35.20	290.00	10,208.00
TOTAL	<u>87.50</u>		<u>\$32,272.00</u>
	<b>BLENDED RATE</b>	<b>\$368.82</b>	
	DISCOUNT (17%)*		(5,011.94)
	TOTAL EXPENSES		<u>1,244.62</u>
TOTAL AMOUNT OF THIS INVOICE			<u>\$28,504.68</u>
	ADJUSTED BLENDED RATE	\$311.54	

\* 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

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: 10390

09/30/2023

Client ID: 90156

For Professional Services Rendered Through September 30, 2023

<u>DATE</u>	<u>STAFF</u>	<u>DESCRIPTION</u>	<u>HRS</u>	<u>AMOUNT</u>
LITIGATION SUPPORT				
09/01/2023	SKB	T/C WITH JODY QUICK FROM VALID8 AND JOEL PATHYEL REGARDING ITEMS TO MATCH IN VALID8 TO PREPARE RECONSTRUCTION.	0.80	342.40
09/01/2023	SKB	REVIEW TRANSACTIONS IN VALID8 TO MATCH TO SUPPORT FOR BANK RECONSTRUCTION.	0.50	214.00
09/01/2023	JLP	RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	2.50	725.00
09/01/2023	JLP	T/C WITH JODY QUICK FROM VALID8 AND SURUCHI BANEZ REGARDING MATCHED ITEMS IN PREPARATION OF RECONSTRUCTION	0.80	232.00
09/04/2023	JLP	RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	1.90	551.00
09/05/2023	SKB	REVIEW TRANSACTIONS IN VALID8 TO MATCH TO SUPPORT TO PREPARE BANK RECONSTRUCTION.	0.30	128.40
09/05/2023	JLP	PREPARATION OF ENDLESSLY HANDY BANK RECONSTRUCTION BASED ON VALID8 DATA	2.10	609.00
09/05/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	3.40	986.00
09/06/2023	SKB	REVIEW TRANSACTIONS IN VALID8 TO MATCH TO SUPPORT TO PREPARE BANK RECONSTRUCTION.	0.30	128.40
09/06/2023	MMD	REVIEW STATUS OF FORENSIC RECONSTRUCTION OF HOMEOWNER DEPOSITS.	0.10	45.00
09/06/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA.	0.20	58.00
09/08/2023	SKB	UPDATE SUMMARY SCHEDULES FOR PAYROLL ANALYSIS, PREFERENCE TARGET ANALYSIS AND PROFESSIONAL FEE ANALYSIS AS REQUESTED BY RUSSELL LANDY AND ADDRESS FOLLOW INQUIRIES REGARDING SUPPORTING DOCUMENTS.	2.70	1,155.60
09/08/2023	SKB	REVIEW AND ANALYZE TRANSACTION DETAIL FROM VALID8 TO PREPARE BANK RECONSTRUCTION FOR HOA ACCOUNTS.	0.40	171.20
09/08/2023	MMD	ATTEND TC WITH COUNSEL RE LITIGATION SUPPORT.	0.50	225.00
09/08/2023	MMD	REVIEW DAMAGES SCHEDULES.	0.70	315.00

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09/08/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	4.20	1,218.00
09/11/2023	FDD	PREPARE BANK RECONSTRUCTION FOR HAMMOCKS FOR THE PERIOD FROM JANUARY 2019 THROUGH DECEMBER 2022.	1.60	576.00
09/11/2023	SKB	RESEARCH AND ADDRESS EMAIL FROM R. LANDY REGARDING POTENTIAL PREFERENCE ACTION SUPPORT.	0.10	42.80
09/11/2023	MMD	ATTEND TO PREPARING DAMAGES SCHEDULE FOR RASCO MATTER.	0.30	135.00
09/11/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	5.80	1,682.00
09/12/2023	SKB	PARTICIPATE IN T/C WITH R. LANDY REGARDING GREAT AMERICAN INSURANCE RESTITUTION PAYMENTS FROM NAVARRO AND LANTIGUA.	0.40	171.20
09/12/2023	SKB	RESEARCH TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY ALPHA AND CATEGORY.	3.20	1,369.60
09/12/2023	SKB	RESEARCH, ADDRESS, AND PREPARE SCHEDULES FOR INQUIRY FROM R. LANDY REGARDING GREAT AMERICAN INSURANCE RESTITUTION PAYMENTS RELATED TO LANTIGUA AND NAVARRO.	2.20	941.60
09/12/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	4.20	1,218.00
09/13/2023	SKB	PARTICIPATE IN T/C WITH ADRIANA PAVON REGARDING INSURANCE CLAIM SUPPORTING DOCUMENTS AND REMAINING MISSING BANK DOCUMENTS REQUIRED TO COMPLETE BANK RECONSTRUCTION.	0.90	385.20
09/13/2023	SKB	RESEARCH AND ANALYZE 2019 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	1.90	813.20
09/13/2023	SKB	RESEARCH AND ANALYZE 2020 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	1.90	813.20
09/13/2023	SKB	RESEARCH AND ANALYZE 2021 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	1.90	813.20
09/13/2023	SKB	RESEARCH AND ANALYZE 2022 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	1.80	770.40
09/13/2023	MMD	REVIEW UPDATES BANK RECONSTRUCTIONS AND DEPOSIT SUPPORT.	1.10	495.00
09/14/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE 2019 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	0.80	342.40
09/14/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE 2020 TRANSACTIONS	0.90	385.20

		IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.		
09/14/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE 2021 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	0.90	385.20
09/14/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE 2022 TRANSACTIONS IN HAMMOCKS BANK RECONSTRUCTION TO IDENTIFY AND POPULATE ALPHA AND CATEGORIES.	0.90	385.20
09/14/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF TRANSACTIONS IN COMBINED HAMMOCK RECONSTRUCTION	0.80	232.00
09/15/2023	SKB	PREPARE DRAFT NARRATIVE OF KM SERVICES IN PREPARATION FOR BOARD MEETING ON 9/19/2023.	1.90	813.20
09/15/2023	MMD	TC WITH PABLO MAIDA RE HOA ACCOUNTING.	0.50	225.00
09/18/2023	SKB	RESEARCH AND ANALYZE ADMINISTRATIVE / OFFICE EXPENSES IN BANK RECONSTRUCTION TO FURTHER CATEGORIZE INTO P&L CATEGORIES USING THE GENERAL LEDGER.	1.40	599.20
09/18/2023	MMD	REVIEW PRIOR ACCOUNTING RECORDS FOR 2018 AND 2020 TO COORDINATE PREPARATION OF FINANCIAL STATEMENTS.	1.10	495.00
09/18/2023	SRK	CASE OVERSIGHT AND REVIEW INTERIM UPDATE TO RECEIVER.	0.20	90.00
09/19/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE ADMINISTRATIVE / OFFICE EXPENSES IN BANK RECONSTRUCTION TO FURTHER CATEGORIZE INTO P&L CATEGORIES USING THE GENERAL LEDGER.	3.90	1,669.20
09/19/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RELATED PARTY COMBINED RECONSTRUCTION BASED ON VALID8 DATA.	2.90	841.00
09/20/2023	SKB	RESEARCH AND ANALYZE TRANSACTIONS IN BANK RECONSTRUCTION OF RELATED PARTIES TO DESIGNATE ALPHA SORT AND CATEGORIES.	2.10	898.80
09/20/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RELATED PARTY COMBINED RECONSTRUCTION BASED ON VALID8 DATA.	4.20	1,218.00
09/21/2023	SKB	CONTINUE TO RESEARCH AND ANALYZE TRANSACTIONS IN BANK RECONSTRUCTION OF RELATED PARTIES TO DESIGNATE ALPHA SORT AND CATEGORIES.	3.30	1,412.40
09/25/2023	SKB	FINALIZE RELATED PARTY BANK RECONSTRUCTION AND PREPARE SUMMARY ALPHA SORT AND SUMMARY CATEGORY SCHEDULES.	1.80	770.40
09/25/2023	SKB	FOLLOW-UP AND COORDINATE MISSING BANK DOCUMENT REQUESTS WITH ADRIANA PAVON.	1.10	470.80
09/25/2023	MMD	FOLLOW UP WITH COUNSEL ON MISSING BANK RECORDS.	0.40	180.00
09/25/2023	JLP	PREPARATION OF HAMMOCK COMMUNITY ASSOCIATION RELATED PARTY COMBINED RECONSTRUCTION BASED ON VALID8 DATA. RESEARCH AND RECONCILIATION OF	0.90	261.00

TRANSACTIONS IN COMBINED RELATED PARTY RECONSTRUCTION				
09/25/2023	SRK	CASE OVERSIGHT	0.20	90.00
09/26/2023	SKB	PARTICIPATE IN T/C WITH PABLO MAIDA AND M. DAVIS REGARDING RETENTION AND PREPARATION OF TAX RETURNS AND AUDITED FINANCIALS STATEMENTS.	1.00	428.00
09/26/2023	MMD	TC WITH COUNSEL.	0.10	45.00
09/26/2023	MMD	TC WITH TEAM REGARDING FINANCIAL STATEMENT PREP.	1.00	450.00
09/26/2023	SKB	PREPARE RECONSTRUCTION OF HAMMOCKS CREDIT CARD ACCOUNTS.	0.70	299.60
09/26/2023	SKB	COORDINATE WITH ADRIANA PAVON TO REQUEST MISSING BANK DOCUMENTS AND MERCHANT BATCH SUPPORT FROM BANKS. PREPARE DETAIL SCHEDULES OF MISSING DEPOSITS AND BATCH DETAIL TO INCLUDE IN REQUESTS.	1.90	813.20
09/26/2023	KJJ	PREPARE HAMMOCKS BANK STATEMENTS TO UPLOAD TO VALID8 FOR BANK RECONSTRUCTION	1.50	294.00
09/26/2023	JLP	PREPARE AND UPLOAD HAMMOCK CREDIT CARD STATEMENTS WITHIN VALID8	0.70	203.00
09/27/2023	SKB	T/C WITH ADRIANA PAVON REGARDING RESPONSES FROM POPULAR BANK AND UNRESPONSIVE DOCUMENTS PRODUCED.	0.50	214.00
09/27/2023	JLP	MEETING WITH JODY QUICK REGARDING VALID8 UPLOADING PROCESS FOR HAMMOCK CREDIT CARD COMBINED STATEMENTS	0.40	116.00
09/28/2023	SKB	REVIEW AND ANALYZE DRAFT SUBPOENA REQUESTS FROM ADRIANA PAVON AND PARTICIPATE IN T/C TO DISCUSS REVISIONS.	0.60	256.80
09/29/2023	JLP	PREPARE AND UPLOAD HAMMOCK CREDIT CARD STATEMENTS WITHIN VALID8	0.20	58.00
				32,272.00
				32,272.00
EXPENSES				
09/30/2023	EXP	SHAREFILE - SEPTEMBER 2023		5.77
09/30/2023	EXP	VALID8 FINANCIAL, INC. - INVOICE #1979		1,238.85
				1,244.62
				1,244.62

Discount (5,011.94)

Total amount of this invoice \$28,504.68

OPTIONAL WIRE/ACH INSTRUCTIONS

Bank Name: The Northern Trust Company  
1100 East Las Olas Blvd.  
Fort Lauderdale, FL 33301-2387  
Phone: 954-768-4000  
Fax: 954-768-4017

Bank ABA Routing: 071000152

Swift Code: CNORUS44

Account Name: KAPILAMUKAMAL, LLP

Account Number: 3802463544

BEFORE PROCESSING THE WIRE, YOU MUST CALL AND  
VERBALLY CONFIRM THESE WIRE INSTRUCTIONS WITH  
KAPILAMUKAMAL



# INVOICE

Invoice # 7904  
Date: 08/01/2023  
Due On: 08/31/2023

## 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	07/06/2023	Review email from defendant's counsel.	0.10	\$400.00	\$40.00
Service	MA	07/28/2023	Review Plaintiff's motion to dismiss without prejudice due to settlement.	0.10	\$400.00	\$40.00
Service	MA	07/31/2023	Review order of dismissal without prejudice.	0.10	\$400.00	\$40.00
Service	MA	07/31/2023	Review emails between plaintiff's counsel and defendant's counsel.	0.10	\$400.00	\$40.00

**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
7815	07/31/2023	\$160.00	\$0.00	\$160.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7904	08/31/2023	\$160.00	\$0.00	\$160.00

<b>Outstanding Balance</b>	<b>\$2,920.00</b>
<b>Amount in Trust</b>	<b>\$0.00</b>
<b>Total Amount Outstanding</b>	<b>\$2,920.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 7903  
Date: 08/01/2023  
Due On: 08/31/2023

## 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	07/05/2023	Review plaintiff's motion for sanctions against Defendant Biscayne Beach Club.	0.20	\$400.00	\$80.00
Service	MA	07/05/2023	Review notice of hearing on Toorak's motion for sanctions against co-defendant Biscayne Beach Club and send email to D. Cohen re attending hearing.	0.20	\$400.00	\$80.00
Service	MA	07/06/2023	Review notice of hearing on Plaintiff's motion for sanctions against defendant Biscayne Beach Club.	0.10	\$400.00	\$40.00
Service	MA	07/07/2023	Review email from A. Ruff and respond to same.	0.10	\$400.00	\$40.00
Service	MA	07/07/2023	Send email to E. Thompson.	0.10	\$400.00	\$40.00
Service	MA	07/10/2023	Review email from client and respond to same.	0.10	\$400.00	\$40.00
Service	MA	07/11/2023	Confer with E. Thompson.	0.30	\$400.00	\$120.00
Service	MA	07/13/2023	Send email to E. Thompson.	0.10	\$400.00	\$40.00
Service	MA	07/14/2023	Confer with E. Thompson.	0.10	\$400.00	\$40.00
Service	MA	07/17/2023	Confer with client.	0.10	\$400.00	\$40.00
Service	MA	07/17/2023	Draft notice of withdrawal of joinder and send to V. Vazquez to file.	0.20	\$400.00	\$80.00

Service	MA	07/17/2023	Confer with counsel for co-defendant.	0.10	\$400.00	\$40.00
Service	MA	07/18/2023	Send update to client.	0.10	\$400.00	\$40.00
Service	MA	07/19/2023	Review defendant Biscayne Beach Club's response to plaintiff's motion for sanctions.	0.10	\$400.00	\$40.00
Service	MA	07/20/2023	Review filing of transcript of hearing on motion to compel.	0.20	\$400.00	\$80.00
Service	MA	07/21/2023	Review Toorak's opposition to motion to vacate.	0.30	\$400.00	\$120.00
Service	MA	07/31/2023	Review proposed order and correspondence sent to Court.	0.20	\$400.00	\$80.00
<b>Quantity Subtotal</b>						<b>2.6</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	2.6	\$400.00	\$1,040.00
<b>Quantity Total</b>			<b>2.6</b>
<b>Subtotal</b>			<b>\$1,040.00</b>
<b>Total</b>			<b>\$1,040.00</b>

## 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
7814	07/31/2023	\$1,560.00	\$0.00	\$1,560.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7903	08/31/2023	\$1,040.00	\$0.00	\$1,040.00
<b>Outstanding Balance</b>				<b>\$8,240.00</b>

<b>Amount in Trust</b>	<b>\$0.00</b>
<b>Total Amount Outstanding</b>	<b>\$8,240.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 7906  
Date: 08/01/2023  
Due On: 08/31/2023

## 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	07/17/2023	Draft notice of withdrawal of notice of joinder.	0.20	\$400.00	\$80.00
Service	VV	07/17/2023	Finalize and e-file Notice of Withdrawal of Notice of Joinder	0.40	\$200.00	\$80.00
<b>Quantity Subtotal</b>						<b>0.6</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
Viviana Vazquez	0.4	\$200.00	\$80.00
<b>Quantity Total</b>			<b>0.6</b>
<b>Subtotal</b>			<b>\$160.00</b>
<b>Total</b>			<b>\$160.00</b>

## 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
7817	07/31/2023	\$360.00	\$0.00	\$360.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7906	08/31/2023	\$160.00	\$0.00	\$160.00
<b>Outstanding Balance</b>				<b>\$7,900.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$7,900.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 7907  
Date: 08/01/2023  
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	07/17/2023	Draft notice of withdrawal of notice of joinder to motion to vacate.	0.20	\$400.00	\$80.00
<b>Quantity Subtotal</b>						<b>0.2</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
<b>Quantity Total</b>			<b>0.2</b>
<b>Subtotal</b>			<b>\$80.00</b>
<b>Total</b>			<b>\$80.00</b>

## 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
7818	07/31/2023	\$1,520.00	\$0.00	\$1,520.00
7612	08/31/2023	\$3,080.00	\$0.00	\$3,080.00

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7907	08/31/2023	\$80.00	\$0.00	\$80.00

**Outstanding Balance**      **\$7,880.00**

**Amount in Trust**              **\$0.00**

**Total Amount Outstanding**      **\$7,880.00**

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.





# INVOICE

Invoice # 7905  
Date: 08/01/2023  
Due On: 08/31/2023

## 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	07/06/2023	Review notice of cancellation of hearing on motion for summary judgment because of bankruptcy stay.	0.10	\$400.00	\$40.00
<b>Quantity Subtotal</b>						<b>0.1</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.1	\$400.00	\$40.00
<b>Quantity Total</b>			<b>0.1</b>
<b>Subtotal</b>			<b>\$40.00</b>
<b>Total</b>			<b>\$40.00</b>

## Detailed Statement of Account

### Other Invoices

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

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7905	08/31/2023	\$40.00	\$0.00	\$40.00
<b>Outstanding Balance</b>				<b>\$2,640.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$2,640.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 8073  
Date: 09/05/2023  
Due On: 09/30/2023

## 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	MA	08/03/2023	Review letter to court and proposed order sent by plaintiff.	0.20	\$400.00	\$80.00
Service	MA	08/04/2023	Review order from evidentiary hearing.	0.10	\$400.00	\$40.00
Service	MA	08/15/2023	Review notice of deposition of corporate representative of defendant condominium association.	0.10	\$400.00	\$40.00
Service	MA	08/23/2023	Review witness list filed by defendant Biscayne Beach Club (0.1); Review transcript of hearing filed by Plaintiff (0.1).	0.20	\$400.00	\$80.00
Service	MA	08/24/2023	Review notice of mediation.	0.10	\$400.00	\$40.00
Service	MA	08/30/2023	Review mediator's report.	0.10	\$400.00	\$40.00
<b>Quantity Subtotal</b>						<b>0.8</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.8	\$400.00	\$320.00
<b>Quantity Total</b>			<b>0.8</b>
<b>Subtotal</b>			<b>\$320.00</b>
<b>Total</b>			<b>\$320.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7814	07/31/2023	\$1,560.00	\$0.00	\$1,560.00
7903	08/31/2023	\$1,040.00	\$0.00	\$1,040.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8073	09/30/2023	\$320.00	\$0.00	\$320.00
<b>Outstanding Balance</b>				<b>\$2,920.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$2,920.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



# INVOICE

Invoice # 8072  
Date: 09/05/2023  
Due On: 09/30/2023

## 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	08/12/2023	Review notice of filing affidavit of indebtedness.	0.10	\$400.00	\$40.00
Service	MA	08/17/2023	Review email from Plaintiff re setting hearing on motion for summary judgment.	0.10	\$400.00	\$40.00
Service	MA	08/17/2023	Review order vacating case management order.	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

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8072	09/30/2023	\$120.00	\$0.00	\$120.00
<b>Outstanding Balance</b>				<b>\$120.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$120.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 25 days.



# INVOICE

Invoice # 8242  
Date: 10/04/2023  
Due On: 11/03/2023

## 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	09/05/2023	Review message from plaintiff's counsel and confer with same.	0.10	\$400.00	\$40.00
Service	MA	09/05/2023	Send email to client re call with Toorak's counsel.	0.10	\$400.00	\$40.00
Service	MA	09/07/2023	Review email from L. Lagomasino re amounts due.	0.10	\$400.00	\$40.00
Service	MA	09/07/2023	Review defendant's certificate of mediation settlement authority.	0.10	\$400.00	\$40.00
Service	MA	09/11/2023	Review Plaintiff's notice of deposition of defendant condominium association.	0.10	\$400.00	\$40.00
Service	MA	09/25/2023	Review email re setting hearing on motion to transfer.	0.10	\$400.00	\$40.00

**Quantity Subtotal 0.6**

Time Keeper	Quantity	Rate	Total
Maia Aron	0.6	\$400.00	\$240.00

**Quantity Total 0.6**

**Subtotal \$240.00**

**Total            \$240.00**

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
7814	07/31/2023	\$1,560.00	\$0.00	\$1,560.00
7903	08/31/2023	\$1,040.00	\$0.00	\$1,040.00
8073	09/30/2023	\$320.00	\$0.00	\$320.00

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8242	11/03/2023	\$240.00	\$0.00	\$240.00

**Outstanding Balance        \$3,160.00**

**Amount in Trust                \$0.00**

**Total Amount Outstanding    \$3,160.00**

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.





# INVOICE

Invoice # 8243  
Date: 10/04/2023  
Due On: 11/03/2023

## 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	09/05/2023	Review plaintiff's motion to transfer.	0.10	\$400.00	\$40.00
Service	MA	09/28/2023	Review email from A. Ruff and respond to same.	0.10	\$400.00	\$40.00
<b>Quantity Subtotal</b>						<b>0.2</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
<b>Quantity Total</b>			<b>0.2</b>
<b>Subtotal</b>			<b>\$80.00</b>
<b>Total</b>			<b>\$80.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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7817	07/31/2023	\$360.00	\$0.00	\$360.00
7906	08/31/2023	\$160.00	\$0.00	\$160.00

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8243	11/03/2023	\$80.00	\$0.00	\$80.00
			<b>Outstanding Balance</b>	<b>\$600.00</b>
			<b>Amount in Trust</b>	<b>\$0.00</b>
			<b>Total Amount Outstanding</b>	<b>\$600.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 8244  
Date: 10/04/2023  
Due On: 11/03/2023

## 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	09/05/2023	Review motion to transfer filed by plaintiff.	0.10	\$400.00	\$40.00
Service	MA	09/29/2023	Review notice of hearing on Plaintiff's motion to transfer.	0.10	\$400.00	\$40.00
<b>Quantity Subtotal</b>						<b>0.2</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	0.2	\$400.00	\$80.00
<b>Quantity Total</b>			<b>0.2</b>
<b>Subtotal</b>			<b>\$80.00</b>
<b>Total</b>			<b>\$80.00</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
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7818	07/31/2023	\$1,520.00	\$0.00	\$1,520.00
7907	08/31/2023	\$80.00	\$0.00	\$80.00

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8244	11/03/2023	\$80.00	\$0.00	\$80.00
<b>Outstanding Balance</b>				<b>\$1,680.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$1,680.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.



# INVOICE

Invoice # 8241  
Date: 10/04/2023  
Due On: 11/03/2023

## Mark Migdal & Hayden

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

David Gersten

US

**00974-Gersten**

**Hammocks 22-13543**

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	MA	09/14/2023	Review documents sent by Defendants' counsel, prepare memo and send to client.	1.20	\$400.00	\$480.00
Service	MA	09/14/2023	Confer with Interians' counsel.	0.10	\$400.00	\$40.00
Service	MA	09/14/2023	Send email to Defendants' counsel.	0.10	\$400.00	\$40.00
Service	MA	09/14/2023	Review and respond to email from L. Lagomasino.	0.20	\$400.00	\$80.00
Service	MA	09/15/2023	Review email from Defendants' counsel and respond to same.	0.10	\$400.00	\$40.00
Service	MA	09/15/2023	Respond to client's email.	0.20	\$400.00	\$80.00
Service	MA	09/19/2023	Follow up with L. Lagomasino re response from FSR.	0.10	\$400.00	\$40.00
Service	MA	09/19/2023	Review email from L. Lagomasino and send email to Defendants' counsel re status.	0.10	\$400.00	\$40.00
Service	MA	09/21/2023	Follow up with L. Lagomasino.	0.10	\$400.00	\$40.00
Service	MA	09/24/2023	Review file and draft memorandum with recommendation and send same to client.	1.00	\$400.00	\$400.00
Service	MA	09/25/2023	Review email from client and call and send email to Defendants' counsel.	0.20	\$400.00	\$80.00
Service	MA	09/25/2023	Review emails from defendants' counsel	0.10	\$400.00	\$40.00

and respond to same.						
Service	MA	09/26/2023	Confer with Defendants' counsel.	0.10	\$400.00	\$40.00
Service	AR	09/28/2023	Conference re: drafting settlement agreement and stipulation of dismissal	0.10	\$400.00	\$40.00
Service	MA	09/28/2023	Confer with A. Rosenthal re drafting settlement agreement.	0.20	\$400.00	\$80.00
Service	AR	09/28/2023	Draft and prepare settlement agreement and stipulation of dismissal	0.50	\$400.00	\$200.00
Service	AR	09/29/2023	Draft and prepare settlement agreement	1.30	\$400.00	\$520.00
<b>Quantity Subtotal</b>						<b>5.7</b>

Time Keeper	Quantity	Rate	Total
Maia Aron	3.8	\$400.00	\$1,520.00
Annie Rosenthal	1.9	\$400.00	\$760.00
<b>Quantity Total</b>			<b>5.7</b>
<b>Subtotal</b>			<b>\$2,280.00</b>
<b>Total</b>			<b>\$2,280.00</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
8241	11/03/2023	\$2,280.00	\$0.00	\$2,280.00
<b>Outstanding Balance</b>				<b>\$2,280.00</b>
<b>Amount in Trust</b>				<b>\$0.00</b>
<b>Total Amount Outstanding</b>				<b>\$2,280.00</b>

Please make all amounts payable to: Mark Migdal & Hayden

Please pay within 30 days.