

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

IN RE:

CASE NO.: CACE 24-005243

HERON POND CONDOMINIUM
ASSOCIATION, INC.

Petitioner.

v.

HERON POND CONDOMINIUM
ASSOCIATION, INC.,

Defendant/Respondent

RECEIVER'S FIRST APPLICATION FOR FEES AND COSTS

Pursuant to Paragraph 26 of the *Order Granting Verified Petition for Appointment of Receiver* dated April 26, 2024 (the "Order Appointing Receiver"),¹ Daniel J. Stermer the Court-appointed Receiver ("Receiver"), hereby submits the Receiver's First Application for Fees and Costs ("First Application"), requesting approval of the Receiver and his professionals fees and costs through June 30, 2024 (the "Fees and Costs"), and directing payment of certain of the Fees and Costs and states:

I. BACKGROUND

On April 16, 2024, the Plaintiffs, Heron Pond Condominium Association, Inc. (the "Plaintiff" or "Association"), commenced this action by the filing of a Verified Petition For Appointment of a Receiver against the Association.

¹ Capitalized terms used herein shall be given the definition provided in the Order Appointing Receiver, unless otherwise stated.

Heron Pond is an “Association” as defined in Chapter 718, Florida Statutes, located within Broward County and is governed by the Declaration of Condominium Establishing Heron Pond Condominium (the “Declaration”), recorded on June 14, 2006 in Official Records Book 42216, Page 910, in the Public Records of Broward County, Florida. The Association is comprised of 304 individual units contained in 19 separate buildings (the “Buildings”) owned by various individuals and entities (the “Members”).

As of September 12, 2023, six out of the nineteen buildings located within the Association were declared unsafe structures by the City of Pembroke Pines and rendered uninhabitable. An additional 26 units in the remaining buildings have also been rendered uninhabitable. On July 3, 2024, the City of Pembroke Pines (the “City”) declared Building 9 an unsafe structure. As of that time, 134 units have been deemed unsafe by the City resulting in the displacement of many residents that were forced to leave their homes and find alternative living arrangements.

On July 22, 2024, the Receiver received an updated Engineering Report from ACG Engineering Services, Inc. (the “Engineering Report”) which was filed with the Court pursuant to the Notice of Filing and attached hereto as **Exhibit “A”**. The Engineering Report has also been provided to the Members and residents by posting the Notice of Filing on the Receiver’s Website and by email transmittal.

On July 23, 2024, the City declared the remaining 12 Buildings comprising the Association unsafe structures and required all residents to vacate their Units by no later than August 29, 2024. Details regarding these issues are set forth in the Receiver’s Third Monthly Report filed on July 24, 2024 and the Receiver’s Notice of Filing ACG Engineering, Services, Inc. Engineering Report Dated July 24, 2024, which are incorporated herein by reference.

On April 16, 2024, the Association’s board of directors filed an *Ex Parte Verified Emergency Motion for Appointment of a Receiver* (the “Motion”), recognizing “the monumental task ahead and realizing that they are incapable of addressing the myriad of issues plaguing the Association caused by the conduct of the prior Board of Directors that permitted the Association Property to fall into a state of substantial disrepair.” See Motion ¶1. The Motion asserted that the Association and its Members’ properties are being wasted, lost, deteriorated, destroyed and deprived because of the prior deplorable conduct. . . and that the appointment of a receiver is necessary and proper to preserve the Association’s and its Members’ properties. See Motion ¶3.

On April 26, 2024, the Court entered the *Order Appointing Receiver*. Since that time, the Receiver and his professionals have tirelessly worked to get up to speed regarding the issues plaguing the Association and its Members. The Receiver has engaged an additional independent engineering firm and contractor to perform their own investigation as to the status and condition of the Buildings. The Receiver continues to provide updates regarding his actions to the Members through emails and the Receiver’s website: <https://heronpondreceiver.com/> (the “Receiver’s Website”).

Paragraph 26 of the Order Appointing Receiver provides:

The Receiver shall file a statement of account with the Court by the tenth (10th) day of each month for the time and expenses incurred in the preceding calendar month. **If no objection thereto is filed within ten (10) days following the filing thereof, such statement of account may be paid.** If an objection is timely filed, such statement of account shall not be paid absent further order of the Court, however, the Receiver may seek entry of an order from the Court authorizing payment on an expedited basis. The Receiver and its professionals reserve the right to seek a success or transaction fee, which shall be subject to further Court approval. For the avoidance of doubt, Receiver and his retained professionals shall not disclose attorney-client privileged communications, including work-product or other privileged information, and may redact from any filing time entries and/or references to tasks that would reveal privileged information, if

any party challenges the reasonableness of the fees and costs incurred and paid by Receiver pursuant to this Order. The Receiver shall otherwise take reasonable steps to provide the Court with confidential, non-public information through the use under seal filings, as may be required from time to time for in camera inspection by the Court.

On June 10, 2024, the Receiver filed his Initial Statement of Account Of Receiver providing notice of the Court of the fees and costs incurred by the Receiver from April 26, 2024 through May 31, 2024 (the “Initial Statement”). The Initial Statement was uploaded to the Receiver’s Website on June 11, 2024. In the Initial Statement, the Receiver wrote: “**This is not an application for payment of fees and costs and at this time, the Receiver and his professionals are not requesting payment of their fees and costs.** (emphasis in original). No Party filed an objection the the Initial Statement prior to the deadline to object.

On July 10, 2024, the Receiver filed his Second Statement of Account of Receiver providing notice to the Court of the fees and costs incurred by the Receiver from June 1, 2024 through June 30, 2024 (the “Second Statement”). The Second Statement was uploaded to the Receiver’s Website on July 15, 2024. No Party filed an objection to the Second Statement prior to the deadline to object.

Notwithstanding the language of the Receivership Order, which permits the Receiver to pay for the time and expenses of his professionals if no objection to a Statement of Account is filed within ten days following the filing thereof, the Receiver and his professionals file this First Application for full transparency in requesting approval of and authorizing payment for said services. Pursuant to this First Application, the Receiver and his Professionals request the Court enter an Order approving and authorizing the entirety of the Fees and Costs set forth in the Initial Statement and Second Statement. The Receiver will pay the amount that the Receiver believes, in the exercise of his professional judgment is reasonable, understanding at this time the Association

does not have adequate funds available to pay all of the Receiver's and his professionals' fees and costs. No further court order or action will be necessary to pay professionals the Fees and Costs set forth in the Initial Statement and Second Statement.

II. WORK PERFORMED IN PERIOD

As indicated in the Receiver's First Monthly Report ("First Report") filed on May 23, 2024, and the Second Monthly Report filed on June 25, 2024 (the "Second Report"), which are incorporated by reference herein as if fully set forth herein, this case has required substantial work by the Receiver and his professionals. Since the Receiver's appointment, he and his team have taken control of the Association's bank accounts and have been provided access to the accounting platform utilized by the current bookkeeper, Preferred Accounting Services, Inc. ("PAS"). Per discussions with PAS, the system replaced the prior accounting system utilized by the former bookkeeper retained by prior management. The Receiver's duties have required various in-person meetings and site visits, as well as countless telephone and video conferences with (i) officials and representatives from the City of Pembroke Pines, (ii) the Association's property manager, West Broward Community management, (iii) the Association's engineers and contractors, (iv) insurance brokers, (v) real property brokers, (vi) Members and tenants, (vii) counsel in various pending litigations by and against the Association, (viii) Federated Trust, the owner of at least 111 of the Association's units, and (iv) other constituents with interests in the Property or the action, to learn about the Association's status and facilitate his management and oversight of the Association and attendant Property. The Receiver is working expeditiously to make sure the life and safety issues plaguing the Property and Buildings are controlled and do not pose an imminent risk to the residents.

The Receiver and his professionals also obtained and examined the Associations' banking financial information from Popular Bank and Truist Bank, and has identified an additional bank

account maintained at Ocean Bank. The Receiver anticipates conducting additional investigations and research to identify all bank accounts and assets associated with the Association. The Receiver and his professionals have spent substantial time investigating and understanding the status of the property, casualty, windstorm and liability insurance policies and working with the Association's insurance broker to investigate potential options for the Association to obtain appropriate and sufficient insurance. The Receiver also had to address numerous lawsuits pending in Broward County Circuit Court, against the Association. The Receiver and his professionals have also substantially participated in each hearing before the Court and provided the Court with notice regarding insurance and other issues plaguing the Property. On June 18, 2024, the Receiver's team was able to obtain property, casualty, and liability insurance policies for the Association understanding that the Association had previously lost its property insurance prior to the appointment of the Receiver.

Currently, the Receiver and his team are running a dual track process and working to obtain the necessary information to present to Unit Owners to help make an informed decision as to whether the Association should rehabilitate the Buildings or commence a competitive sale process.

III. FEES AND EXPENSES INCURRED BY THE RECEIVER AND HIS PROFESSIONALS

The Receiver seeks Court approval and authority to pay the fees and costs incurred by the Receiver, his counsel, Berger Singerman, LLP, his financial advisory and consulting firm, Development Specialist, Inc., and special condominium counsel, Eisinger Law through June 30, 2024 pursuant to the previously filed Initial Statement and Second Statement. Attached hereto as **Composite Exhibit "B"**, the Receiver and his Professionals provide to the Court, redacted invoices encompassing the fees and costs in the Initial Statement and Second Statement.

A. SUMMARIES

For the Court’s convenience, the Receiver has prepared the below aggregate tabular summary of all fees by professional from the date of the Order Appointing Receivership through June 30, 2024:

RECEIVER, DANIEL J. STERMER

<u>Receiver</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Total Fees</u>
Daniel J. Stermer	\$ 495.00	180.7	\$89,446.50
TOTAL AMOUNT AS OF JUNE 30, 2024			\$89,446.50

BERGER SINGERMANN LLP

<u>Name of Attorney/Paraprofessional</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Total Fees</u>
Brian G. Rich	\$750.00	62.3	\$46,725.00
Jeffrey Wertman	\$725.00	13.3	\$9,642.50
Michael J. Niles	\$635.00	90.2	\$57,277.00
Paul Figg	\$700.00	8.8	\$6,160.00
Luis Torres	\$295.00	12.9	\$3,805.50
Janette Diaz	\$295.00	2.6	\$767.00
TOTAL AMOUNT AS OF JUNE 30, 2024			\$124,377.00

DEVELOPMENT SPECIALISTS, INC.

<u>Name of Professional</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Total Fees</u>
George E. Shoup III	\$595.00	170.6	\$89,565.00
Spencer Ferrero	470	3.5	\$1,645
TOTAL AMOUNT AS OF JUNE 30, 2024			\$91,210.00

EISINGER LAW

<u>Name of Attorney</u>	<u>Hourly Rate</u>	<u>Hours Worked</u>	<u>Total Fees</u>
Alessandra Stivelman	\$420.00	21.1	\$8,862.00
Alejandro Alonso	\$350.00	22.4	\$7,840.00
Michael Villarosa	\$360.00	1	\$360.00
TOTAL AMOUNT AS OF JUNE 30, 2024			\$17,062.00

IV. MEMORANDUM OF LAW

A. Services Rendered by the Receiver and His Professionals

The professional services rendered by the Receiver and his professionals, as well as the necessary and reasonable non-reimbursed out-of-pocket costs attendant to those services, are summarized above. Notwithstanding, a mere reading of the above summaries, the Initial Statement, the Second Statement, the First Report, and the Second Report cannot completely reflect the full range of services rendered by the Receiver and his professionals, the complexity of the issues, and the pressures of time and performance which have been placed upon the Receiver and his professionals in connection with this case.

The schedules of disbursement for expenses are the actual and necessary expense items, including but not limited to photocopying fees, court reporter fees, and postage charges, including Federal Express charges incurred in connection with the Receiver complying with the Order Approving Receivership. All of these expenses are expenses that the Receiver and his professionals would typically bill to their commercial clients.

As discussed below, the Receiver's fees and costs are reasonable and were necessarily incurred in discharging his duties under the Order Appointing Receiver. To date, the Receiver and

his professionals have not been paid any compensation in connection with the services and expenses referenced herein and none has received any retainer.

B. Applicable Legal Standard

In determining attorneys' fees payable to a court-appointed fiduciary, a court must consider (1) the amount of money coming into the appointee's hand, (2) the amount and character of time and responsibility involved, (3) the character and extent of the property committed to the case, (4) the beneficial results of the management, and (5) various other matters incident to the position. *Feemster v. Schurkman*, 291 So. 2d 622 630 (Fla. 3d DCA 1974) (discussing payment of receiver's fees).

i. The Amount of Money Coming into the Receiver's Hands

As noted in the First Report and Second Report, the Receiver gained control of all bank accounts belonging to the Association, which collectively had an ending balance as of June 30, 2024 of \$890,459 of which approximately \$415,000 is in the Association's two operating accounts with the balance in the Association's reserve and special assessment accounts. The Receiver and his professionals have not curtailed or in any respect limited their work in this matter as a result of the lack of funds presently available to pay whatever of their fees this Court awards. To the contrary; the Receiver and his professionals have made their attention to this matter, especially the life and safety issues plaguing the Association, a priority. The Receiver and his professionals continue to try and collect outstanding condominium association assessments and special assessments from the Unit Owners and will take steps necessary to enforce nonpayment including, but not limited to, utilizing the Eisinger Firm to send Demand Letter to Unit Owners to collect Monthly Assessment and/or Special Assessments that have not been timely remitted and reserving the right to take further legal action as may be necessary should a Unit Owner not remit their

outstanding balance(s).

ii. The Amount and Character of Time and Responsibility Involved

The foregoing summary description detail the time, nature, and extent of the professional services rendered by the Receiver and his professionals during the period covered by this First Application. The Receiver is responsible for managing and preserving assets of the Receivership Entities, collecting and analyzing information relevant to his duties, cooperating with the Association's directors, and dealing with pending litigation and negotiations with third parties and Members. As is apparent from the First Report and the Second Report the Receiver and his team were tasked with a unique case involving a wide array of issues. As noted above, this case has required myriad in-person, video, and telephone meetings and site inspections, along with voluminous correspondence, with the Association's directors, the Association's prior counsel, the Association's engineers, insurance brokers and other professionals, the City, and other non-parties relating to the operation and background of the Association. The Receiver has necessarily and at an increasingly granular level investigated and analyzed the Associations operations, board members, prior professionals and vendors, contracts, Members, leases, insurance policies and financial transactions to discharge his duties. This involved analysis into structural reports, construction contracts, Member ledgers, prior meeting minutes, banking and financial documents, and other property information. The Receiver has been in constant contact with various third parties, such as Members, who in many instances have received virtually no information whatsoever regarding the status of the Association Property despite being required to pay substantial special assessments to pay for necessary life and safety repairs to the Buildings. In addition, the Receiver moved quickly to stay all litigation against the Association, and transfer all matters to the Receivership Court, to preserve and maximize its assets and reduce legal and

litigation expenses. These matters, along with the day-to-day management of the Association—including evaluating and determining structural issues, management issues, property expenses, leasing and sales, insurance issues, has required significant attention from the Receiver and his team. The Receiver and his professionals have worked on this matter nearly every day since the Court appointed the Receiver.

Interpreting and analyzing the myriad of structural issues plaguing the property, the claims by creditors and Members, corporate transactions, and insurance issues, has required substantial legal skill, and experience in the areas of commercial law, condominium law, and litigation. The Receiver and his team have adapted well to address the circumstances surrounding the Association's business and the Receiver's obligations under the Order Appointing Receiver and will continue to maximize the value of the Assets and Property for the benefit of the Receivership Estates. A copy of this Application will be posted on the Receiver's Website.

V. CONCLUSION

Based on the foregoing, the Receiver, his Counsels, and financial advisor respectfully request that this Court enter an order (a) approving and authorizing compensation to the Receiver of \$89,446.50 for his fees; (b) approving and authorizing compensation to the Receiver's counsel, Berger Singerman, of \$124,377.00 for its fees and expenses; (c) approving and authorizing compensation to the Receiver's financial advisor Development Specialist, Inc. for a total of \$91,210.00 for its fees and expenses; (d) approving and authorizing compensation to the Receiver's special condominium counsel Eisinger Law for a total of \$17,062.00 for its fees and expenses; (e) directing the Receiver to pay the amount that the Receiver believes, in the exercise of his professional judgment is reasonable, understanding at this time the Association does not have adequate funds available to pay all of the Receiver's and his professionals' fees and costs. No

further Court order or action will be necessary to pay professionals the Fees and Costs set forth in the Initial Statement and Second Statement. (f) reserving jurisdiction to enter additional orders authorizing the payment of the authorized fees and expenses held back pursuant to this Order and (e) granting such other relief that is just and proper.

Dated: July 29, 2024

Respectfully submitted,

BERGER SINGERMAN LLP
Counsel for Receiver
201 East Las Olas Boulevard
Suite 1500
Fort Lauderdale, Florida 33301
Tel. (954) 525-9900
Fax (954) 523-2872

By: /s/ Brian G Rich

Brian G Rich
Florida Bar No. 38229
brich@bergersingerman.com
Jeffrey Wertman
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jwertman@bergersingerman.com
Michael J. Niles
Florida Bar No. 107203
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DRT@bergersingerman.com

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on July 29, 2024, the foregoing was filed using the Florida Court's E-Filing Portal, which will, in turn, send notice of electronic filing to all electronic service parties.

By: /s/ *Brian G Rich*
Brian G Rich

EXHIBIT A



Date: July 22nd, 2024

To: Board of Directors
Heron Pond Condominium Assoc., Inc.
8400 SW 1st Street
Pembroke Pines, FL 33025

Building Officials
Pembroke Pines Building Department
601 City Center Way
Pembroke Pines, FL 33025

Re: Heron Pond Condominium
Buildings 1 through 19
Update on Structural Status

Dear Directors/Building Officials:

Almost a year ago Andres Caicedo and I, representing ACG Engineering Services, Inc. (ACG), attended a meeting that included representatives from the City of Pembroke Pines, the property manager for Heron Pond at the time, and several owners from Heron Pond. During that meeting, as we discussed our initial findings as detailed in our initial reports for Buildings #2, #3, and #10 and the procedures to be followed to repair all nineteen (19) buildings, we laid out our position that there were individual units that needed to be evacuated based on our findings and that access to all balconies needed to be eliminated. Our position allowed for unit owners residing in units where no signs of interior deterioration had been observed to remain in their units without access to their balconies except in the case of emergencies.

During that part of the meeting, we were asked by the Fire Department what our recommendations would be should a storm be forecast to make landfall at the property. The ACG response was that we did not have enough information regarding the true conditions of the concealed structural elements to allow us to recommend that the buildings were safe for sanctuary in the case of an impending storm event. Therefore, ACG would recommend that all buildings be temporarily evacuated in the event of a tropical storm or hurricane warning that included the Heron Pond property within the warning area.

At the time of the meeting, the understanding between ACG and Heron Pond was that the buildings would be repaired expeditiously and in accordance with the Florida Building Code. Given the original intent and the pace with which the Contractor eventually commenced his work, the repairs would have been completed on at least 12 of the 19 buildings by now. Given the fact that we were addressing the buildings in order of worst to best structural conditions, and based on our conception of the damages, we expected to be repairing the buildings with the least number of deficiencies by this point in time. The storm warning evacuation procedure stated above would have remained in place for those buildings not yet repaired, with the understanding that the first dozen buildings already repaired, with any deficiencies discovered having been addressed, would be structurally sound.

The initial pace of the repair project lasted for less than a month, with the amount of work done per day being drastically reduced as the December holidays approached. The initial pace was never matched, or even closely approached, again. As things stand today, the structure of only one of the 19 buildings (Buildings #2) has been completely repaired and two others (Buildings #3 and #10) have been repaired to a level above 50%. None of the first six buildings (Buildings #2, #3, #10, #5, #14, and #16) has been completed and turned back over to the unit owners.



In addition to the change in pace which has resulted in most of the buildings remaining in their damaged, unrepaired conditions, we have discovered existing conditions, as part of our repair process, that speak to the concern regarding the lateral load resistance of the buildings in the case of a storm event. While the damages to the structure that affect the building's vertical (gravity) load support strength were in line with our initial findings, much about the building's lateral (wind) load support has been discovered as part of the repair process we have designed and observed and as part of discoveries made by an independent engineering firm, Specialty Engineering Consultants, Inc. (SPEC).

We observed and corrected deficiencies in the lateral load resistance structural components that were discovered during the repair processes in Buildings #2, #3, and #10. SPEC has discovered a number of deficiencies in Building #9 as well. The lateral load deficiencies are different from the structural damages that have been the focus of the year-long repair project. While the repair details in the permit documents include proper connections for the lateral load conditions, and while those connections have been applied throughout the first three buildings where the absence of proper connections were discovered, the other 16 buildings, where repairs have not yet started, likely have the same wind load resistance deficiencies.

The structural damages, discovered during our survey and described in our reports, are a result of long-term exposure to the elements (moisture, termites, etc.). However, the lateral load deficiencies, such as the absence or under-sizing of necessary connections, are the result of some combination of inadequate design and inadequate construction practices. The lateral load deficiencies, hidden in the structures, the "bones" of the buildings, are not detectable by visual examination of the buildings' interiors or exteriors and they are not the cause of the visual signs of damage that led to the concerns about the structures and the commencement of the repair project.

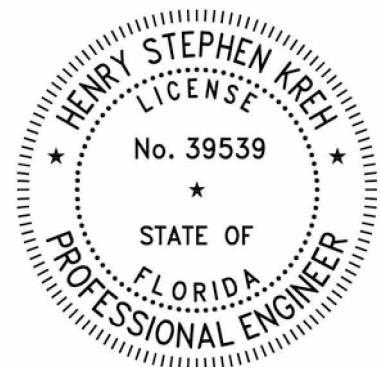
Nevertheless, based on the fact that we are now aware of a consistency of lateral load deficiencies noted in all four buildings that have had the support structures significantly exposed to date, it is my professional opinion, to the best of my knowledge, that all 19 buildings should be vacated, at least until the end of "hurricane season," or until the required repairs have been completed and the buildings are once again deemed to be habitable.

If you have any questions, comments, or concerns, please let us know. Thank you.

Respectfully submitted,

Henry S Kreh Digitally signed by Henry S Kreh
Date: 2024.07.22 13:55:46 -04'00'

Henry S. Kreh, P.E.
Vice President
ACG Engineering Services, Inc.
FL P.E. No. 39539/FL S.I. No. 736



COMPOSITE EXHIBIT B



REMIT TO:
 10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026
 Telephone: 312.263.4141 Telecopier: 312.263.1180

No. 14156

Date: 7/26/2024

Heron Pond Condominium Association, Inc.
 8400 SW 1st St.
 Pembroke Pines, FL 33025-1420

F.E.I.N. 36-2967476

Description of Services and Disbursements	Fees	Disbursements	Credits	Balance
For professional services rendered through June 30, 2024:				
Fees per attached category summary:	\$89,446.50			\$89,446.50
TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.				PAY AMOUNT ABOVE

			HOURS
06/04/2024	DJS	Communication from Michael Niles forwarding draft proposed First Application for Fees and Costs, review same, and prepare/send proposed comments, edits, and suggestions to same to Michael Niles.	0.40
06/05/2024	DJS	Additional review of latest draft of Receiver's First Application for Fees and Costs and prepare/send further proposed edits, comments, and suggestions to same.	0.30
	DJS	Prepare/send communication to DSI requesting WIP/Cost Detail through May 31, 2024 and follow up communications to/from/with DSI regarding same and communication from Chris DePaul with Cost Detail and review same and prepare/send follow up communication regarding same.	0.10
	DJS	Communications to/from/with Michael Niles and Alessandra Stivelman regarding preparation of professional fee summaries and next steps and prepare/send follow up regarding same.	0.10
	DJS	Communication from Michael Niles with draft proposed Initial Statement of Account Fees and Costs, review same, and prepare/send follow up communication to Michael Niles regarding same.	0.20
06/06/2024	DJS	Multiple communications to/from/with Patty Taubr regarding WIPs for April 26, 2024 through May 31, 2024 and updating/revisions to same and review same and prepare/send follow up communications regarding updating of same.	0.60
	DJS	Update and revise Receiver's Initial Statement of Account Fees and Costs and prepare/forward same to Michael Niles with attachments.	0.20
06/07/2024	DJS	Communication from George Shoup with Receiver's Initial Statement of Account Fees and Costs, review same, and prepare/send follow up communication to Michael Niles and Brian Rich regarding same.	0.20
	DJS	Follow up communication from Michael Niles to Alessandra Stivelman regarding preparation of professional fee summary and request for information for same and follow up communication from Alessandra Stivelman regarding same and prepare/send follow up communication regarding same.	0.10

		HOURS	
06/10/2024	DJS	Communication from Michael Niles forwarding latest draft of Receiver's Initial Statement of Account Fees and Costs, review same, and prepare/send follow-up communication with proposed comments, edits, and suggestions to same.	0.30
	DJS	Communication from Eisinger Law with the updated/revised professional fee summary/invoice for the period April 26, 2024 through May 31, 2024, and review same and prepare/send follow-up regarding same.	0.10
	DJS	Follow-up communication from Michael Niles with finalized Receiver's Initial Statement of Account Fees and Costs, review same, and prepare/send follow-up communication to Michael Niles with By Category/By Consultant Reports.	0.20
		Fee Application/Client Billing	2.80
			1,386.00
04/30/2024	DJS	Communication from Michael Niles with draft proposed retention motions, Oath and Acceptance, Notice of Receiver's Bond, and bank turnover letter, review same, and prepare/send follow up communication to Michael Niles/George Shoup with proposed comments/edits/suggestions to same.	0.50
	DJS	Process draft proposed Oath and Acceptance, prepare/send same to Stacey Cooper and review notarized Oath and Acceptance, and prepare/send follow up communication to Michael Niles forwarding same.	0.10
	DJS	Communication from Berger Singerman with proposed Engagement Letter, review and process same, and transmit fully executed Engagement Letter.	0.20
05/02/2024	DJS	Communication from George Shoup with the draft DSI engagement letter, review same, and prepare/send follow up communication with proposed edits to same.	0.30
05/03/2024	DJS	Communication from Michael Niles to Alessandra Stivelman/Alex Alonso and George Shoup regarding status of retention filings and follow up communication from Alessandra Stivelman regarding same and prepare/send follow up communication regarding same.	0.10
	DJS	Communication from George Shoup regarding proposed DSI engagement letter and corresponding motion/order, review same, and prepare/forward same to Michael Niles.	0.10
	DJS	Communications to/from/with Michael Niles and Janette Diaz regarding finalization and preparation of filing of Berger Singerman and DSI retention filings, review same, and prepare/send follow up communication regarding	

			HOURS	
		same.	0.10	n/c
	DJS	Communication from Alex Alonso/Eisinger Law with revised/updated Motion to Employ and Retainer Letter, review same, and process/finalize same and prepare/forward same to Berger Singerman.	0.10	n/c
05/06/2024	DJS	Communication from Court with as filed Receiver's Motion for Approval of Employment of Eisinger Law as Special Counsel to the Receiver Effective April 26, 2024 and review same.	0.10	n/c
05/15/2024	DJS	Communication from Abby McCann/Specialty Engineering with Consulting Services engagement letter, review same, process same, and prepare/transmit same to Abby McCann and Michael Niles for preparation of motion.	0.10	n/c
05/16/2024	DJS	Communication from Michael Niles regarding retention of engineer and preparation of motion regarding same, teleconference with Brian Rich regarding same, and prepare/send follow up communication to Michael Niles regarding same.	0.20	n/c
	DJS	Communication from Michael Niles with draft proposed Motion to Employ Specialty Engineering Consultants as independent engineers, review proposed motion/order, and prepare/forward same to Mark Leblanc.	0.10	n/c
	DJS	Teleconference with Bill Fullwood regarding acting as independent construction professional to work with Specialty Engineering and discuss scope and related issues and prepare/send follow up communication to Bill Fullwood regarding retention and the next steps.	0.30	n/c
05/17/2024	DJS	Communication from Michael Niles to Mark Leblanc regarding draft proposed Motion to Employ and proposed Order and prepare/send follow up communication regarding same to Michael Niles.	0.10	n/c
	DJS	Communication from Court with regard to Motion to Employ Specialty Engineering and review same.	0.10	n/c
05/20/2024	DJS	Multiple communications from Michael Niles with draft proposed Orders regarding retention motions, review same, and prepare/send follow up communications to Michael Niles and additional communication from Michael Niles with updated/revised draft proposed Orders, review same, and prepare/send follow up communication to Michael Niles regarding same and communication from Court regarding receipt of uploaded Orders and pending status.	0.20	n/c
05/21/2024	DJS	Multiple communications from Court with orders		

			HOURS	
		on retention of DSI, Berger Singerman, Eisinger, and Specialty and prepare/forward same to George Shoup and other firms.	0.10	n/c
05/30/2024	DJS	Communication from Michael Niles forwarding draft proposed Motion to Employ BBS Builders and Order, review same, and prepare/send follow up communication to Michael Niles with proposed edits, suggestions, and comments to same and additional follow up communication from Michael Niles with updated/revised draft Motion to Employ, review same, and prepare/send follow up communication to Michael Niles.	0.30	n/c
05/31/2024	DJS	Communication from Court with as filed Receiver's Motion to Employ BBS Builders, review same, and prepare/forward same to George Shoup and prepare/forward same to BBS Builders.	0.10	n/c
06/17/2024	DJS	Communication from Court with regard to setting of hearing regarding Receiver's Motion for Approval of Employment of BBS Builders, Inc. as General Building Contractor to the Receiver and review same.	0.10	
	DJS	Communication from Court with Notice of Hearing regarding BBS Builders and review same.	0.10	
06/19/2024	DJS	Communication from Court with Order Granting Receiver's Motion for Approval of Employment of BBS Builders, Inc. as General Building Contractors to the Receiver and prepare/forward same to George Shoup and prepare/forward same to Bill Fullwood.	0.10	
06/25/2024	DJS	Multiple communications from Court with regard to scheduled hearing on Motion to Employ BBS Builders and cancellation of same, and review same, and review Notice of Cancellation of Hearing as filed.	0.10	
		Retention/Engagement Matters	0.40	198.00
05/06/2024	DJS	Multiple communications from Court Clerk's Office regarding e-service related issues and being added to same and review same.	0.10	
	DJS	Communication from Court with Receiver's Notice Regarding Status of Property Insurance and Liability Insurance and review same.	0.10	
05/08/2024	DJS	Communication from Court with Notice of Special Set Hearing for May 15, 2024 and review same and prepare/forward same.	0.10	
05/16/2024	DJS	Communication from Court regarding Re-Notice of Special Set Hearing regarding various retention motions and review same and prepare/forward same to George Shoup.	0.10	n/c

		HOURS	
05/20/2024	DJS	Video call with the Court regarding retention motions with George Shoup and Brian Rich, Michael Niles, and Jeff Wertman and Alessandra Stivelman and Alex Alonso and ACA Paul Hernandez and follow up video call with George Shoup and Brian Rich, Michael Niles, and Jeff Wertman.	0.70
06/10/2024	DJS	Communication from Court with as filed Initial Statement of Account of Receiver, Daniel J. Stermer and review same.	0.10
06/13/2024	DJS	Communication from Court with Notice of Appearance filed by [REDACTED] [REDACTED] for [REDACTED] [REDACTED] and review same, and prepare/forward same to Brian Rich, Michael Niles, and George Shoup.	0.10
06/18/2024	DJS	Attend Zoom hearing before Judge Tuter with Jeff Wertman, Michael Niles, and George Shoup and follow-up video call with George Shoup and teleconferences with Jeff Wertman and Michael Niles, review draft proposed Orders, and prepare/send follow-up communications regarding draft proposed Orders.	0.80
06/19/2024	DJS	Communication from Court with Order Granting Receiver's Emergency Motion for Authority to Enter Into Insurance Policies and Insurance Premium Finance Agreement, review same, and prepare/forward same to George Shoup.	0.10
		Attend Court Hrgs/Rev Pleadgs	2.10
			1,039.50
04/29/2024	DJS	Communication from Brian Rich with Task List as prepared, review same, and prepare/send follow up communication with comments to same.	0.30
	DJS	Teleconference with Alex Alonso regarding matter status, BOD related issues, and DBPR Complaint received and preparation of response for same.	0.20
	DJS	Follow up communication from George Shoup with updated/revised Task List, review same, and prepare/send follow up communication regarding same.	0.20
	DJS	Prepare/send communication to Austin McNichols regarding Receiver's Bond and provide Order and request same be processed and follow up communication from Jim McNichols regarding processing of same.	0.10
	DJS	Communication from Michael Niles with draft Cover Letter to be send to Residents with Court Order, review same, and prepare/send follow up communication with initial proposed edits/revisions to same and additional communication from George Shoup with proposed	

		HOURS
	edits/suggestions to same, review same, and prepare/send additional comments/edits to draft proposed Cover Letter and additional communications to/from/with George Shoup and Staff regarding same and processing of same.	0.40
DJS	Communication from Alex Alonso regarding Service of Order and upcoming Construction Committee meeting, prepare/send follow up communication regarding same, and follow up communication from Alessandra Stivelman regarding Order/service/meeting and issues related to same, and prepare/send further follow up communication regarding same and additional communications to/from/with George Shoup and BOD member regarding Construction Committee Meeting and follow up regarding same.	0.20
DJS	Additional communications to/from/with Alessandra Stivelman regarding upcoming meeting with City of Pembroke Pines and status of same and prepare/send multiple follow up communications regarding same.	0.10
04/30/2024	DJS Communication from Ben Meyers/Assured Partners regarding insurance related issues/status and prepare/send follow up communication to Ben Meyers.	0.10
	DJS Teleconference with George Shoup regarding matter status and next steps.	0.20
	DJS Prepare/send communication to Preferred Accounting Services as follow up to George Shoup communications, cite to Order, and provide Order.	0.30
	DJS Communication from George Shoup regarding status of West Broward management invoices, review same, and review follow up communication from George Shoup to Analyze Costales regarding status of West Broward invoices and request for call, review same, and prepare/send follow up communication to Analyze Costales.	0.10
	DJS Teleconference with Jesus Pena regarding creation of Receiver's website and prepare/send communication to Jesus Pena with information/documentation to create same.	0.30
05/01/2024	DJS Video call with George Shoup and Brian Rich and Michael Niles and ██████████/Counsel for ██████████ ██████████ regarding matter and issues relative to same.	0.50
	DJS Communications to/from/with Brian Rich and Paul Figg regarding upcoming meeting in Pembroke Pines and status related issues.	0.10
	DJS Prepare/send follow up communication to City Attorney Goren in advance of meeting with Pembroke Pines and follow up communication from City Attorney Goren and teleconference with City Attorney Goren regarding upcoming meeting.	0.20

		HOURS
	DJS Communication from George Shoup with draft correspondence to Truist and Popular Bank regarding Receivership Order and request for assistance, review same, finalize same, and prepare/send same to Truist and Popular Bank.	0.20
	DJS Teleconference with Michael Niles regarding research and status of same.	0.20
	DJS Review multiple emails/documents relative to insurance related issues as received from Association representatives.	0.20
	DJS Prepare/send communication to Stacey Cooper regarding request to update Unit Owner workbook and monitoring of new receivership e-mail address for incoming Contact Forms and follow up communication from Stacey Cooper regarding same and communication from George Shoup to Stacey Cooper regarding same and discussions with Stacey Cooper regarding same.	0.20
	DJS Communication from Ana Costales forwarding 2024 Approved Budget and January, February, March 2024 Financial Statements, review same, and prepare/send follow up communication to Brian Rich, Michael Niles, and George Shoup.	0.40
	DJS Multiple and extensive communications and discussions with George Shoup regarding information gathering, financial information, insurance related issues, banking related issues, and discussions with various property professionals and others.	2.10
05/02/2024	DJS Communications to/from/with Michael Niles and Michael Higer regarding insurance related issues and potential motion regarding same and review same and additional follow up communications regarding same.	0.20
	DJS Visit Heron Pond Condominium Association property and meet with staff in Clubhouse and prepare/send follow up communication to George Shoup, Berger Singerman, and Eisinger Law about instruction to cease leasing.	1.00
05/03/2024	DJS Multiple Michael Niles communications regarding Declarations and issues related to same, review same, and follow up communication from Alessandra Stivelman regarding same, and prepare/send follow up communication regarding same to Michael Niles and Alessandra Stivelman.	0.30
05/06/2024	DJS Communication from George Shoup to Popular Bank representatives regarding receivership order as entered and request for assistance relative to accounts and next steps and prepare/send follow up communication regarding same to Popular Bank, and further communication from George Shoup forwarding communication/response from Popular Bank.	0.20

		HOURS
	DJS Multiple and extensive communications to/from/with Michael Niles and Michael Higer regarding insurance status and related issues as to current policy status, review same, review draft Notice of Status of Insurance Policies prepared by Michael Niles, review communication from George Shoup regarding draft Notice, and prepare/send follow up communication regarding finalization and filing of same and additional communications to/from/with Michael Niles regarding same and finalization of same.	0.90
	DJS Additional communications to/from/with Michael Niles and Michael Higer regarding insurance related issues and prepare/send follow up communication regarding same.	0.10
	DJS Communication from Michael Niles regarding City of Pembroke Pines Permit related issues and status and review same.	0.30
	DJS Video call with Michael Niles and Joseph Pardo/Association Counsel regarding matter status and Association related issues and pending litigation.	0.60
	DJS Video call with Michael Niles and Ben Solomon/Former Association Counsel regarding matter and previous representation related issues.	0.30
05/07/2024	DJS Communication from Michael Niles regarding City permit related issues and status and review same.	0.20
	DJS Teleconference with Mark Leblanc/Specialty Engineering regarding property and request for engagement.	0.30
05/08/2024	DJS Prepare/send communication to Michael Niles regarding former Association Counsel and follow up requesting preservation and follow up communication from Michael Niles to Stevens & Goldwyn regarding same and review same.	0.10
	DJS Teleconference with Michael Niles regarding discussions had with George Shoup and Jim Fiore/West Broward Management and follow up related to same.	0.20
	DJS Video call with George Shoup and Michael Niles as follow up to previous video call with [REDACTED] [REDACTED] representatives and next steps regarding same.	0.20
	DJS Communication from Michael Niles with updated/revised Task List and prepare/send follow up communication regarding same.	0.10
	DJS Teleconference with Alex Alonso regarding matter status and related issues.	0.20
05/09/2024	DJS Telephone conference call with George Shoup on pending matters and status of financial	

		HOURS
	information provided.	0.30
DJS	Communication from George Shoup forwarding Owner Account Statement Log and additional information regarding same, review same, and prepare/send follow up communication to Michael Niles regarding same and follow up communication from George Shoup regarding same	0.20
DJS	Visit property with Paul Figg, Alex Alonso, and Mark Leblanc/Specialty Engineering and walk certain buildings and discuss same.	3.00
05/13/2024	DJS Communication from Michael Niles regarding the Balance Sheet review for the period of January 2024 through March 2024 and review same and underlying documents and prepare/update Balance Sheet analysis and prepare/send same to Michael Niles, Brian Rich, and George Shoup.	0.40
	DJS Communication from Michael Niles forwarding certain documentation provided by Joe Pardo and review same.	0.20
05/14/2024	DJS Communication from Alex Alonso regarding Capital Contribution related issues and review same, communication from Michael Niles regarding same and review same, prepare/send follow up communication regarding same and Balance Sheet related issues, and follow up communication from George Shoup regarding same and additional communications to/from/with Alessandra Stivelman and Jeff Wertman regarding same and prepare/send communication to Joe Pardo regarding same and review Joe Pardo response to same and communications to/from/with Tom Fiore/West Broward Management regarding same and communication from Michael Niles to Ben Solomon/Former HOA Counsel regarding same and review same.	0.50
	DJS Communication from George Shoup with Popular Bank activity export, review same, and prepare/send follow up communication regarding same.	0.10
05/15/2024	DJS Multiple communications from Ana Costales forwarding various financial documents/information and review same.	0.40
	DJS Video call with George Shoup in advance of upcoming call with Ana Costales regarding accounting/financial related issues and status.	0.40
	DJS Communication from Preferred Accounting/DropBox regarding sharing of documents and communication from Crystal Zhang/Preferred Accounting with link to Dropbox files, download same, and initial review of same.	0.20
05/16/2024	DJS Visit property with Mark Leblanc/Specialty Engineering and Steven Pizzillo/CBO Pembroke	

		HOURS
	Pines to discuss Receiver's independent analysis of structures and process related issues regarding same and continue walking of property after Leblanc/Pizzillo leave and prepare/send follow up communication to Mark Leblanc and Steve Pizzillo regarding next steps and follow up communication from City Attorney Goren and teleconference with City Attorney Goren and ACM Stamm regarding same.	2.60
DJS	Communication from Michael Niles forwarding Heron Pond Receivership Master Task List, review/update same, and prepare/send same to Michael Niles.	0.30
DJS	Research documents related to structures at Heron Pond and prepare/send CAD drawings for each residential building to Mark Leblanc/Speciality Engineering.	0.60
DJS	Review various engineering/safety related documents/reports.	0.40
05/21/2024	DJS Video call with George Shoup regarding various financial/operational analysis/issues and review/status of same.	0.50
05/22/2024	DJS Review George Shoup's communication with Owners Ledger for ██████████ ██████████, review same, and prepare/send follow up communication to ██████████ ██████████ requesting listing of ██████████ ██████████ Units owned for completeness of analysis of Amount Outstanding and additional communications to/from/with ██████████ ██████████ regarding same and prepare/send additional follow up communication.	0.20
05/28/2024	DJS Video call with George Shoup regarding financial/insurance related issues/analysis/status and potential next steps regarding same.	0.50
	DJS Further review of ██████████ ██████████ workbook as to unit ownership relative to amount outstanding and due from ██████████ ██████████ for monthly/special assessments.	0.20
05/29/2024	DJS Video call with George Shoup regarding financial aspects of matter and ██████████ ██████████ related issues and analysis of Owners Ledger.	0.30
06/04/2024	DJS Video call with George Shoup regarding financial status and related issues.	0.20
	DJS Communication from George Shoup with updated/revised Cash Activity workbook from January 1, 2024 through May 31, 2024 and review same.	0.20
06/05/2024	DJS Video call with George Shoup and Brian Rich and	

			HOURS
		Michael Niles regarding matter status and next steps regarding insurance, financial issues, engineering issues, and setting meeting related issues.	0.80
	DJS	Additional teleconference with Brian Rich regarding various operational and administration issues and next steps.	0.30
	DJS	Video call with George Shoup regarding various financial related issues and status and review of same.	0.30
06/06/2024	DJS	Video call with George Shoup regarding insurance and accounting related issues and status of same and next steps.	0.40
06/07/2024	DJS	Video call with George Shoup regarding various financial, insurance, and contractor related issues and status.	0.40
	DJS	Video call with Brian Rich and Michael Niles and George Shoup regarding financial and construction related issues and assessments.	0.50
	DJS	Communication from George Shoup to Ana Costales forwarding Cash Receipts/Disbursements Workbook and analysis of same and review same.	0.20
	DJS	Video call with Brian Rich and Michael Niles and Mark Leblanc (partial) regarding building/structural related issues and next steps.	0.50
	DJS	Teleconference with Andres Caicedo/ACG Engineering regarding provision of services and status and related issues.	0.30
06/11/2024	DJS	Communication from George Shoup with draft Handouts for Receivership Meeting, review same, and prepare/send follow-up communication regarding same.	0.20
06/13/2024	DJS	Research and review documents, files, information provided by former Association Counsel.	0.60
06/14/2024	DJS	Communication from George Shoup forwarding updated/revised Monthly Case and Accounts Receivable through May 2024 and review same.	0.20
06/21/2024	DJS	Video call with Brian Rich, Michael Niles, and Jeff Wertman regarding property status and potential next steps regarding same related to rehabilitation and/or sale and issues relative to same.	1.00
		Business Analysis	29.20
			14,454.00
06/03/2024	DJS	Video call with George Shoup regarding [REDACTED] related issues/status and communications/teleconference with representative regarding same.	0.20

		HOURS
	DJS Multiple communications to/from/with [REDACTED] [REDACTED] and George Shoup regarding [REDACTED] [REDACTED] and assessment related issues and amounts, review same and workbook forwarded, and communication from [REDACTED] [REDACTED] regarding same, review same, and prepare/send follow up communication in response to same.	0.10
06/10/2024	DJS Communication from George Shoup regarding incoming wire from [REDACTED] [REDACTED] for December 2023 through June 2024 Monthly Assessments and follow-up communication from [REDACTED] [REDACTED] regarding same, and prepare/send follow-up communication to [REDACTED] [REDACTED] regarding same and multiple follow-up communications to/from/with [REDACTED] [REDACTED] regarding same and follow-up communication from George Shoup to Ana Costales regarding receipt of [REDACTED] [REDACTED] Monthly Assessments and booking of same and follow-up communication from Ana Costales regarding booking of same.	0.30
	DJS Video call with George Shoup regarding incoming [REDACTED] [REDACTED] wire for monthly assessments for December 2023 through June 2024 and next steps regarding analysis/finances with same.	0.20
	DJS Prepare/send communication to Alessandra Stivelman/Alex Alonso regarding status of collection of outstanding assessments and status of same and follow-up communication from Alessandra Stivelman regarding same, review same, and prepare/send follow-up communication to Alessandra Stivelman.	0.30
	DJS Multiple teleconferences with Brian Rich regarding collection-related issues and next steps after remittance by [REDACTED] [REDACTED] of Monthly Assessments for December 2023 through June 2024.	0.20
06/11/2024	DJS Communication from Sandra Orta/Eisinger regarding status of Demand Letters relative to outstanding Monthly Maintenance/Special Assessments and next steps, review same, and communication from Alessandra Stivelman regarding same, review same, and prepare/send follow-up communication to Alessandra Stivelman regarding next steps.	0.20
06/21/2024	DJS Communication from Unit Owner regarding Owner Ledger and balance-related issues and follow-up communication from George Shoup regarding same and review same.	0.10
06/24/2024	DJS Communication from Unit Owner regarding setting of auto payment for monthly assessments and payments for outstanding Assessments since	

		HOURS	
		February 2024, and prepare/send follow-up communication to Unit Owner in response.	0.10
DJS		Communication from Unit Owner to George Shoup regarding amount outstanding for Monthly Assessments and additional information/documentation regarding same and review same.	0.10
DJS		Video call with George Shoup regarding matter status and collection of Monthly and Special Assessments and issues related to same.	0.40
DJS		Communication from Sandra Orta/Eisinger to Ana Costales with updated Status Report regarding collection efforts and status, and direction as to how to respond to incoming inquiries and review same.	0.30
06/25/2024	DJS	Additional review of Eisinger Law Status Report regarding collection status and prepare/forward same to Berger Singerman.	0.10
	DJS	Communication from Sandra Orta/Eisinger Law regarding Raffi Anac and Owner Ledger/Amount Outstanding and receipt of Demand Letter from Eisinger, and prepare/send follow-up communication regarding same.	0.10
06/26/2024	DJS	Communications to/from/with George Shoup and Unit Owner regarding collection efforts regarding Amounts Due for Monthly Assessment and Special Assessment, follow-up communication from Eisinger Law regarding same, and additional communications to/from/with George Shoup and Unit Owner regarding potential resolution of same, and additional communications to/from/with George Shoup and Eisenger Law regarding same.	0.20
06/27/2024	DJS	Communication from Unit Owner regarding amount due and outstanding, and follow-up communication from Ana Costales in response to same and review same.	0.10
	DJS	Communication from Unit Owner regarding remittance of Special Assessment and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner Property Manager regarding request for assistance to remit Special Assessment and prepare/send follow-up communication to Unit Owner Property Manager copying Management and Ana Costales.	0.10
		A/R Review/Collection	3.20
			1,584.00
05/02/2024	DJS	Communication and follow up e-mail from Counsel involved in Heron Pond matter and related litigation and prepare/forward same to Michael Niles for follow up and prepare/send follow up e-mail to Counsel and additional communications	

			HOURS
		to/from/with Michael Niles regarding same.	0.20
05/03/2024	DJS	Communication from Counsel for various Plaintiff's in various pending matters, review same, and prepare/send follow up communication to Counsel in response to same.	0.10
	DJS	Communications from David Bakalar/Counsel for [REDACTED] [REDACTED] [REDACTED] regarding pending litigation and property related issues, review same, and prepare/send follow up communication to Michael Niles, Paul Figg, and George Shoup regarding same and additional follow up communications to/from/with George Shoup regarding same and review follow up communication from Michael Niles to David Bakalar regarding same.	0.30
05/06/2024	DJS	Multiple communications to/from/with Joe Pardo/Association Counsel regarding request for documents and download of same and review certain of same relative to [REDACTED] [REDACTED] [REDACTED] litigation and status related issues and additional communications to/from/with Joe Pardo and Michael Niles regarding setting of meeting.	0.50
	DJS	Communication from Michael Niles forwarding communication from Alex Alonso/Eisinger regarding pending litigation matters involving Association and potential additional action and review same.	0.30
	DJS	Multiple communications from Court in various pending matters with Receiver's Notice of Receivership and Motion to Transfer Action to Receivership Court, review same, and prepare/forward same to George Shoup.	0.20
	DJS	Follow up communication from Michael Niles to David Bakalar/Counsel for [REDACTED] [REDACTED] [REDACTED] and request for certain documents and prepare/send follow up communication regarding same.	0.10
05/07/2024	DJS	Multiple communications to/from/with Michael Niles and Kevin Szmuc/Counsel for various pending litigation matters against Heron Pond, review same, and prepare/send follow up communication to Michael Niles and Kevin Szmuc.	0.20
	DJS	Communication from Court in Florival matter with Notice of Cancellation of Hearing set for May 8, 2024, review same, and prepare/forward same based upon Notice/Motion filed.	0.10
	DJS	Video call with George Shoup, Michael Niles and Kevin Szmuc/Plaintiff's Counsel (partial) regarding pending litigation matters and continued call regarding pending litigation, operations, and matter assessment related issues.	1.00

		HOURS
	DJS Communication from Michael Niles with draft proposed Order Granting Motion to Transfer, review same, and prepare/send follow up communication regarding same.	0.10
05/08/2024	DJS Communication from Michael Niles to Kevin Szmuc/David Bakalar/Joe Pardo with draft proposed Proposed Order Granting Motion to Transfer pending litigation matters and review same.	0.10
05/09/2024	DJS Communication from Michael Niles to various Counsels regarding draft proposed Order on Motion to Transfer and prepare/send follow up communication to Counsels regarding same and follow up communications from Counsels regarding same and multiple follow up communications from various Counsels, review proposed edits to same, review same, and follow up communication from Michael Niles regarding same and review further edited proposed Order.	0.20
	DJS Additional communications to/from/with Michael Niles and Plaintiff's Counsel regarding draft proposed Order on Motion to Transfer, review same, and teleconference with Michael Niles regarding same.	0.10
05/10/2024	DJS Multiple communications from Court regarding submission of Agreed Orders on Motions to Transfer and status related issues and review same.	0.10
05/13/2024	DJS Multiple communications from the Court regarding proposed Order submitted on Motion to Transfer and instructions from Court with regard to same and review same and follow up communication from Berger Singerman to Kevin Szmuc, David Bakalar, and Joe Pardo with potential hearing dates for matters and review same.	0.10
05/14/2024	DJS Review multiple Agreed Order Granting Motion to Transfer entered in Coifman, Florival, Rognone, Armory Housing, and Las Araucarius matters and follow up communications to/from/with Brian Rich and Michael Niles regarding same.	0.10
	DJS Communication from Alex Alonso/Eisinger regarding DBPR Complaint received and draft response, communication from Michael Niles regarding same, review same, and prepare/send follow up communication to Alex Alonso to proceed with same.	0.30
05/15/2024	DJS Communication from David Bakalar/Counsel for ██████████ ██████████ regarding pending litigation matters commenced by Association	

		HOURS
	against ██████ review same, and prepare/send follow up communication regarding same and additional communications to/from/with David Bakalar regarding pending litigation and invoices, review same, and prepare/send follow up communication to David Bakalar in response to same and additional follow up communications to/from/with ██████ ██████ ██████ regarding same and prepare/send follow up communication to ██████ ██████ regarding same.	0.30
DJS	Communications to/from/with Michael Niles and Ayleen Blanco regarding submission of Agreed Order after attending hearing and next steps regarding same and review communication from Court relative to pending Agreed Order.	0.10
DJS	Communication from Court in Yuga matter with Notice of Hearing and review same.	0.10
05/16/2024	DJS Communication from Court in Cortes matter entering Agreed Order on Motion to Transfer, review same, and follow up communications to/from/with Michael Niles and Brian Rich regarding same.	0.10
	DJS Additional communications to/from/with Michael Niles and Jeff Wertman regarding remaining Motions to Transfer and potential next steps for same.	0.10
05/17/2024	DJS Communication from Kevin Szmuc/Plaintiff's Counsel regarding Ocean 1212 hearing and follow up regarding same, review same, and review follow up communications from Michael Niles and Ayleen Blanco regarding uploading of proposed Order on Motion to Transfer.	0.10
05/29/2024	DJS Communication from Court regarding Yuga v Heron Pond matter and uploading of proposed Agreed Order following hearing and review same and teleconference with Michael Niles regarding same.	0.10
05/30/2024	DJS Multiple communications to/from/with Keith Szmuc/Plaintiff's Counsel for various matters and Michael Niles and follow up regarding same and review same and review updated/revised draft proposed Agreed Order Granting Motion to Transfer as prepared by Michael Niles after hearing before Court.	0.10
06/03/2024	DJS Communication from Court in the Coifman matter regarding upcoming Case Management Conference and review same.	0.10
	DJS Communication from Kevin Szmuc/Counsel in various lawsuits regarding draft proposed Agreed Order and further comments/edits to same and review same and follow up communication	

		HOURS	
	from Michael Niles regarding same.	0.10	
06/05/2024	DJS Communication from Court in Porto Seguro matter with Agreed Order Granting Motion to Transfer and review same.	0.10	
	Claims Analysis/Objections	5.40	2,673.00
04/26/2024	DJS Prepare/send communication to Alex Alonso regarding status and follow up communication from Alex Alonso with Order Granting Motion to Transfer and review same.	0.10	
	DJS Teleconference with Alex Alonso, review Order entered by Court, video call with George Shoup, Pat O'Malley, Brian Rich, Michael Niles, and Jeff Wertman, and Alex Alonso and Alessandra Stivelman regarding Order entered and next steps, teleconference with Mayor of Pembroke Pines, teleconference with Vice Mayor of Pembroke Pines, prepare/send communication to Mayor/City Manager/City Attorney of Pembroke Pines requesting meeting, communications to/from/with City Attorney of Pembroke Pines, and prepare for next steps.	2.10	
04/27/2024	DJS Teleconference with City Attorney regarding matter and setting of meeting and teleconference with Brian Rich regarding matter and next steps.	0.60	
04/29/2024	DJS Communication from Tom Fiore/West Broward Management in response to communication sent with Order Appointing Receiver and prepare/send follow up communication to Tom Fiore.	0.10	
04/30/2024	DJS Video call with George Shoup and Brian Rich, Michael Niles, and Jeff Wertman, and Alessandra Stivelman and Alex Alonso regarding receivership status and next steps, retention related issues, property/association status and related issues, and meeting with BOD and City of Pembroke Pines.	1.30	
	DJS Video call with George Shoup and Brian Rich and Michael Niles and Alessandra Stivelman and Alex Alonso and BOD members to discuss matter and status and answer questions.	1.10	
05/01/2024	DJS Multiple communications from media/The Real Deal requesting interview, communication from Alessandra Stivelman forwarding communication from media/The Real Deal, and prepare/send follow up communication to media/The Real Deal in response to request for comment.	0.20	
	DJS Follow up communication from ██████████ ██████████ Counsel for ██████████ ██████████ from earlier video call with update, review same, and prepare/send follow up communication to		

			HOURS
		██████ ██████ in response.	0.10
05/02/2024	DJS	Teleconference with Michael Niles regarding setting call/meeting with Hank Kreh/Engineer and follow up communications to/from/with Michael Niles and Hank Kreh regarding same.	0.20
	DJS	Communication from Truist Bank representative in response to letter sent, review same, and attempt to contact Truist Bank representative and leave voicemail message.	0.10
	DJS	Telephone conference call with George Shoup on insurance and pending matters.	0.30
05/03/2024	DJS	Teleconference with George Shoup regarding insurance status, draft motion, and financial status related issues.	0.30
	DJS	Communication from Truist Bank representative, prepare/forward same to George Shoup, teleconference with George Shoup, and communication from George Shoup and prepare/send follow up communication to George Shoup regarding same.	0.10
	DJS	Video call with George Shoup and Michael Niles regarding insurance related issues and status.	0.30
	DJS	Visit Heron Pond property with Paul Figg and Alex Alonso and meet with ACG Engineering Service, Inc. representatives and walk property and discuss building status related issues and next steps.	2.60
	DJS	Teleconference with The Real Deal Reporter (Katherine Kallergis) regarding appointment and issues related to same.	0.10
	DJS	Communications to/from/with Naomi Preston/Keyes Realtors regarding property and Interested Party and teleconference with Naomi Preston regarding same.	0.10
	DJS	Communication from Resident regarding lighting/property related issue, review same, and prepare/forward same to Jennifer Bermudez and prepare/send follow up communication to Resident.	0.10
	DJS	Additional communications to/from/with Michael Niles regarding Ben Solomon/former Association Counsel and reach out to same and efforts regarding same and sending of Turnover/Preservation Letter.	0.20
	DJS	Communication from Jesus Pena regarding creation of new matter website, review same, and prepare/send follow up communication regarding same.	0.10
	DJS	Communication from Alaina Thigpen/Austin McNichols forwarding invoice for Receiver's Bond, review same, and prepare/send follow up communication regarding same.	0.10
	DJS	Multiple communications from George Shoup regarding Joe Pardo/Association Counsel	

		HOURS
	regarding follow up issues related to various pending matters and communication from Joe Pardo regarding representation and prepare/send follow up communication to Joe Pardo.	0.40
DJS	Multiple communications and discussions with George Shoup regarding insurance, banking, and other status related issues.	0.90
05/06/2024	DJS Communication from ██████████ ██████████/Counsel for ██████████ ██████████ regarding setting of call, communications to/from/with Michael Niles regarding same and availability, and prepare/send follow up communication to ██████████ ██████████	0.10
DJS	Video call with George Shoup regarding financial/insurance related issues and status and next steps regarding same.	0.20
DJS	Additional communications to/from/with George Shoup, Ben Meyers, and Denise Brunet-Chu regarding insurance related issues/status and review documents forwarded.	0.40
DJS	Additional communications to/from/with ██████████ ██████████/Counsel for ██████████ ██████████ regarding setting of meeting.	0.10
DJS	Additional communications to/from/with George Shoup and Analyze Costales regarding banking and document/financial information and status/access to same.	0.10
DJS	Communication from Truist Bank regarding updated forms, review same, and execute/transmit same and prepare/send follow up communication to George Shoup regarding same and follow up communications to/from/with Deborah Richendollar/Truist about same.	0.30
DJS	Additional communications to/from/with Ben Meyers and George Shoup regarding insurance related issues and unsafe structures as determined by City of Pembroke Pines and review same.	0.10
DJS	Multiple communications to/from/with Linval Mcknight and George Shoup regarding Popular Bank and updating signature cards, review same, review updated/revised forms forwarded, process same, and transmit same to Linval Mcknight/George Shoup as requested.	0.20
DJS	Additional communication from Truist Bank regarding updated/revised Signature Cards and review same as finalized and prepare/forward same to George Shoup for keeping and obtaining log on credentials.	0.10
DJS	Additional communications to/from/with George Shoup, Ben Meyers, Joe Toppin regarding insurance policies and status of same and review same.	0.40
05/07/2024	DJS Communication from George Shoup regarding West	

	HOURS
Broward Management and contact by Tom Fiore, review same, and prepare/send follow up communication to George Shoup regarding availability.	0.10
DJS Communication from George Shoup forwarding communication from Jennifer Bermudez forwarding Estoppel Request, review same, and prepare/respond to same including Eisinger Law and additional follow up from Alessandra Stivelman regarding same, review same, and prepare/send follow up communication regarding same.	0.20
DJS Communication from Michael Niles regarding distribution of Insurance Notice filed to Unit Owners/Other E-mails and follow up communications to/from/with George Shoup and Stacey Cooper regarding same and prepare/send follow up communication regarding same.	0.10
DJS Discussions with Stacey Cooper regarding sending Insurance Notice to Unit Owners e-mail list and issues relative to same and communications to/from/with George Shoup and Stacey Cooper regarding same and review communication sent to Unit Owners e-mail list with Notice.	0.20
DJS Teleconference with Jesus Pena regarding status of Receiver's website and additional filings to be uploaded and gather/transmit additional filings to Jesus Pena and additional communications to/from/with Jesus Pena regarding same and prepare/send follow up communication and additional documents relative to same and additional communications to/from/with Berger Singerman regarding same and further communications to/from/with Jesus Pena regarding same.	0.40
DJS Communication from George Shoup regarding communications to/from/with Ana Costales/Preferred Accounting regarding access/information related issues and prepare/send follow up communication regarding same to Ana Costales and George Shoup.	0.10
DJS Follow up communication from Popular Bank Representatives regarding updating Signature Card/Address related issues and next steps and prepare/send follow up communication in response to same.	0.10
DJS Video call with George Shoup regarding banking and various operational status/issues.	0.30
DJS Additional communications to/from/with George Shoup regarding Estoppel Letter related issues and review sample of same and prepare/send multiple communications regarding same.	0.20
DJS Multiple communications from George Shoup forwarding various Disclosures and Special Assessment related documents, review same, and	

		HOURS
	prepare/send multiple follow up communications regarding same to Eisinger Law and additional communications to/from/with Michael Niles regarding same and additional communications to/from/with Alessandra Stivelman and George Shoup regarding same.	0.40
	DJS Communication from George Shoup regarding gaining access to Association computer system and status of same and prepare/send follow up communication to George Shoup and Jesus Pena regarding same.	0.10
05/08/2024	DJS Communications to/from/with George Shoup and Jesus Pena regarding access to Association computer system and issues relative to same.	0.10
	DJS Communications to/from/with Jesus Pena and George Shoup regarding Receiver's website and translation of same and review same and prepare/send follow up communication regarding same and additional communication from George Shoup regarding same.	0.10
	DJS Video call with George Shoup and Tom Fiore/West Broward Management regarding property status and related issues.	1.10
	DJS Video call with George Shoup and Michael Niles and [REDACTED] [REDACTED] [REDACTED] [REDACTED], and [REDACTED] [REDACTED] on behalf of [REDACTED] [REDACTED] regarding introduction and matter status and related issues.	0.60
	DJS Communication from Ana Costales regarding online access to Association system, review same, and prepare/send follow up communication to Ana Costales regarding access related issues.	0.10
	DJS Discussion with Michael Niles regarding [REDACTED] [REDACTED] related issues/status and communication to be sent to David Bakalar/Counsel, review communication sent to David Bakalar, and review response from David Bakalar regarding [REDACTED] [REDACTED] requests.	0.10
	DJS Multiple communications to/from/with Ben Meyers and George Shoup regarding insurance related issues and status of obtaining new insurance and review same.	0.10
	DJS Communication from George Shoup with word versions of disclosure documents and review same for revisions.	0.10
05/09/2024	DJS Communication from Popular Bank with online access form to be completed, review and process same, and transmit same to Popular Bank representative.	0.10
	DJS Additional communications to/from/with George Shoup and Jesus Pena regarding online access related issues and status and review same.	0.10
	DJS Communications to/from/with Paul Figg regarding	

		HOURS
	property visit with Engineer and status of same and prepare/send follow up communication regarding same and communication from Alex Alonso regarding same and communications to/from/with Engineer regarding visit.	0.10
DJS	Telephone conference with George Shoup regarding site visit with engineer and issues related to same.	0.20
DJS	Communications to/from/with Jesus Pena regarding ESI related issues and capture/download of same and prepare/send follow up communication regarding same.	0.10
DJS	Additional follow up communication from Jesus Pena to George Shoup regarding ESI related issues and collection of same.	0.10
05/10/2024	DJS Communication from George Shoup regarding payroll, review same, and prepare/send follow up communication to George Shoup approving same.	0.10
	DJS Prepare/send communication to Mark Leblanc/Specialty Engineering following site visit and provide Order and related information.	0.20
	DJS Review various reports/notices/letters related to Heron Pond from professionals and prepare/forward same to Michael Niles, Paul Figg, Alex Alonso, and George Shoup.	0.30
	DJS Communications to/from/with George Shoup and Analyze Costales regarding operations related issues and access related issues and review same.	0.10
	DJS Communication to/from/with George Shoup and Ana Costales requesting various document/information and communication from Ana Costales forwarding April 2024 financial package, Balance Sheet, attachments and review same.	0.40
	DJS Communication from George Shoup with invoice for ACG Engineering and review same.	0.10
	DJS Additional communications to/from/with Gianinne Hurtado and George Shoup regarding Buyer Application and status of same and review same relative to sale related issues.	0.10
	DJS Communication from Gianinne Hurtado/Assistant Property Manager regarding pool related issues and status, review same, and prepare/send follow up communication regarding same as to next steps.	0.10
	DJS Multiple communications from David Bakalar/Counsel for ██████████ ██████████ forwarding various documents, invoices, permits, grids, and follow up communications from Michael Niles regarding same and review same.	0.30
	DJS Communications to/from/with George Shoup and	

		HOURS
	Jennifer Bermudez regarding certain operational issues/status and check status and follow up communications regarding same and review same.	0.10
DJS	Communication from Katherine Kallergis/The Real Deal regarding story published and follow up communications to/from/with Katherine Kallergis and Michael Niles regarding same.	0.10
DJS	Additional communications to/from/with George Shoup regarding payroll related issues and status.	0.10
DJS	Prepare/send follow up communication to Debbie Richendollar/Truist regarding online access related issues and follow up communication from George Shoup to Debbie Richendollar regarding same and request.	0.10
DJS	Communication from Gianinne Hurtado/Assistant Manager regarding Application for New Owner and documents forwarded related to same and prepare/forward same to Michael Niles and George Shoup and follow up communication from Michael Niles regarding same and prepare/forward same to Alessandra Stivelman/Alex Alonso relative to updating Disclosure(s) and follow up communication from Alessandra Stivelman regarding same.	0.10
DJS	Communication from ██████████ ██████████/Counsel for ██████████ ██████████ regarding EQS lease related issues and related documents and initial review of same.	0.10
DJS	Follow up communications to/from/with Ben Meyers and George Shoup regarding insurance related issues and status and review same as to next steps.	0.10
DJS	Communication from George Shoup to Eisinger Law regarding follow up discussions with Jennifer Bermudez regarding documents/statement related issues requested by Eisinger and review same.	0.10
05/13/2024	DJS Communication from David Israel/Israel Israel & Associates on behalf of The Keyes Company and potentially interested purchaser, review same, and prepare/send follow up communication to David Israel in response to same.	0.20
DJS	Video call with George Shoup regarding operational related issue and status and next steps regarding same.	0.30
DJS	Review information/documentation received from ██████████ ██████████/Counsel for EQS Management and ██████████ ██████████ regarding Clubhouse lease related issues and prepare/send follow up communication to ██████████ ██████████ regarding same.	0.30
DJS	Prepare/send follow up communication to Cheryl Glick/Popular Bank representative regarding status of online access and credentials.	0.10
DJS	Review multiple communications to/from/with George Shoup and various insurance	

	HOURS
company/broker representatives and review documents provided by same.	0.30
DJS Additional communications to/from/with [REDACTED] [REDACTED] regarding EQS Management and Clubhouse related issues, review same, and prepare/send follow up communication regarding same and follow up communications to/from/with Michael Niles regarding same.	0.20
DJS Follow up communication from Michael Niles regarding [REDACTED] [REDACTED] and outstanding Accounts Receivable, review same, and follow up communication from George Shoup to Michael Niles and review same.	0.10
DJS Additional review of multiple communications from David Bakalar/Counsel for [REDACTED] [REDACTED] and related documents/invoices and prepare/send follow up communication to David Bakalar regarding same as it relates to shorings, fences, and manlift.	0.20
DJS Multiple communications from Alessandra Stivelman regarding collection related issues/status, review same, and prepare/send follow up communication to Alessandra Stivelman regarding same.	0.10
DJS Follow up communication from Debbie Richendollar/Truist Bank regarding online access, review forms forwarded, complete forms, and prepare/transmit same to Debbie Richendollar/Truist Bank.	0.20
DJS Video call with George Shoup regarding various operational related issues and status.	0.20
DJS Communication from Sandra Orta/Eisinger with Status Report regarding NOLAs and issues relative to same and review report.	0.20
05/14/2024 DJS Communication from Alex Alonso with updated/revised Disclosure - Tenant, Disclosure - Purchaser, and Information Sheet, review same, and follow up communication from Michael Niles regarding same and additional proposed edits to same, review same, and update/revise Disclosures/Information Sheet and prepare/send same to Counsels and additional communications to/from/with Counsels regarding same and communication from Michael Niles to Jennifer Bermudez/Gianinne Hurtado/Tom Fiori with updated/revised Disclosures for use.	0.50
DJS Review Status Report received from Eisinger Law and prepare/send follow up communication regarding same and status of NOLAs and Owner Ledgers.	0.20
DJS Additional communications to/from/with Cheryl Glick/Popular Bank regarding online access, review same, and prepare/send follow up communication to Cheryl Glick regarding same.	0.10
DJS Additional communications to/from/with Michael	

	HOURS
Niles and Alex Alonso regarding Estoppel Certificate related issues/status/review and prepare/send multiple follow up communications to Tom Fiore/Jennifer Bermudez/Gianinne Hurtado regarding same and follow up communications from Jennifer Bermudez and Tom Fiori regarding same and prepare/send additional follow up communications to Tom Fiore/Alessandra Stivelman-Alex Alonso regarding updating/revising Estoppel Certificate.	0.50
DJS Communication from George Shoup to Ana Costales/Preferred Accounting regarding status of providing responsive information/documentation and prepare/send follow up communication regarding same.	0.10
DJS Multiple additional communications to/from/with Tom Fiore/West Broward Management regarding Estoppel Certificate related issues and preparation of same and prepare/send multiple follow up communications regarding same.	0.20
DJS Follow up communication from David Bakalar/Counsel for ██████████ ██████████, review same, and prepare/send follow up communication in response to same and additional communication from David Bakalar regarding same and follow up communication from ██████████ ██████████ ██████████ regarding open invoices for shorings, fencing, and manlift, and prepare/send follow up communication regarding same.	0.20
DJS Follow up communication from David Israel/Counsel for The Keyes Company and prepare/send follow up communication to David Israel.	0.10
DJS Communication from Gianinne Hurtado/West Broward regarding resident complaint at property, review same, and prepare/send follow up communication regarding same and additional communications to/from/with Jennifer Bermudez regarding same.	0.10
DJS Multiple communications to/from/with Cheryl Glick/Popular Bank regarding online access, review/perform same, and prepare/send multiple follow up communications to Cheryl Glick regarding same.	0.20
DJS Video call with George Shoup regarding banking related issues and status.	0.50
DJS Multiple communications to/from/with Jennifer Bermudez regarding pool status and related concerns and prepare/send multiple follow up communications regarding same.	0.20
DJS Multiple additional communications to/from/with Jennifer Bermudez regarding pool related issues/status and prepare/send follow up responses to same.	0.10
DJS Communication from George Shoup regarding	

		HOURS
	communication from Broker regarding cancellation of purchase contract and additional follow up communications to/from/with George Shoup and Broker regarding same, review same, and prepare/forward same to Management Team.	0.10
05/15/2024	DJS Communication from Michael Niles to John Stevens/Former Association Counsel regarding Capital Contribution related issues and review same and follow up communication from John Stevens regarding same and review same and follow up communication from Michael Niles regarding next steps and prepare/send follow up communication regarding same and communication from Michael Niles to Ben Solomon/Former Association Counsel regarding same and follow up communication from Ben Solomon regarding same, review same, and prepare/send follow up communication to Michael Niles/Brian Rich/George Shoup regarding same.	0.20
	DJS Additional communications to/from/with Tom Fiore regarding preparation of Estoppel Certificates and prepare/send follow up communication regarding same.	0.10
	DJS Video call with George Shoup as follow up to discussions with Ana Costales regarding Association books and records and related issues.	0.10
	DJS Teleconference with Truist Bank representative regarding online access and setting same up.	0.20
	DJS Telephone call with George Shoup on pending matters.	0.40
	DJS Prepare/send communication to Tom Fiore and Ana Costales regarding request for Estoppel Certificate, update/revise same, and provide sample Estoppel Certificate and Disclosures.	0.20
05/17/2024	DJS Communication from [REDACTED] [REDACTED] [REDACTED] regarding open May 2024 invoices for shorings, fence, and manlift and potential for removal if payment not received promptly and prepare/send follow up communication regarding same and issues relative to March 2024 invoices and prepare/send communication to Ana Costales regarding status of March 2024 invoices and multiple follow up communications to/from/with George Shoup and Ana Costales regarding same and payment related issues and status and next steps and prepare/send multiple follow up communications to George Shoup and Ana Costales.	0.40
	DJS Communication from Jennifer Potts/The Keyes Company regarding property and potential purchaser related issues and teleconference with Jennifer Potts regarding same and status	

		HOURS
	of property and prepare/send follow up to Michael Niles/Brian Rich regarding same.	0.10
DJS	Communication from [REDACTED] [REDACTED] [REDACTED] regarding timeline and documentation related to engagement and work performed and status and begin review of same.	0.30
05/20/2024	DJS Communication from Michael Niles regarding insurance status and communication from George Shoup providing status update, and further communication from George Shoup forwarding communication from Ben Meyers regarding insurance status and efforts and review same.	0.10
	DJS Communication from George Shoup with Cash Update for matter and review same in advance of hearing.	0.10
	DJS Communication from Brian Rich with draft response to Agent for prospective purchaser, review same, and prepare/send follow up communication to Agent.	0.10
	DJS Communications to/from/with George Shoup and Gianinne Hurtado regarding light repair request and moving forward with same and review follow up communications regarding same.	0.10
	DJS Communication from George Shoup regarding processing of payment for shorings, fencing, and manlift and prepare/send follow up communication to George Shoup approving same and follow up communication from George Shoup to [REDACTED] [REDACTED] requesting banking information to process payment for certain invoices.	0.10
	DJS Communication from George Shoup to Truist Bank regarding processing payment and request for assistance and review same and Truist website and related issues.	0.10
	DJS Communication from George Shoup to Chancy Global Protections- security company requesting outstanding invoices and banking information, review same, and review follow up communication from Chancy Global Protections.	0.10
	DJS Communication from West Broward Management regarding request for Estoppel Certificate, review same, and prepare/send follow up communication and prepare/send further communication after return from Tom Fiore.	0.10
	DJS Video call with George Shoup regarding financial status related issues and processing of vendor payments and next steps/status of same.	0.30
	DJS Communication from West Broward Management forwarding communication from Randy Degler/Sawgrass Builders regarding selection of contractor and prepare/send follow up communication regarding same.	0.10
	DJS Communication from George Shoup to West Broward Management regarding former	

		HOURS
	accounting/bookkeeper and issues relative to same and review same.	0.10
	DJS Communication from WeCount representative regarding construction workers and outstanding pay allegedly due and review same.	0.10
05/21/2024	DJS Prepare/send communication to Jesus Pena to update Receiver's web page with latest filings.	0.20
	DJS Communication from Jesus Pena with Go Daddy receipts for web page and domain name and review same.	0.10
	DJS Communication from Zaina Alsous/WeCount regarding construction worker unpaid wage related issues, review communications to/from/with [REDACTED] [REDACTED] and David Bakalar regarding same, review additional [REDACTED] [REDACTED] communication, and prepare/send follow up communication to Zaina Alsous regarding same.	0.20
	DJS Follow up responsive communication from Randy Degler/Sawgrass Construction regarding restoration work and status related issues, review same, and prepare/send follow up communication regarding same.	0.10
	DJS Multiple communications to/from/with George Shoup and Truist Bank/Deb Richendollar regarding wire request, process necessary documentation, and prepare/transmit same to Truist Bank and follow up communications to/from/with Truist Bank regarding same.	0.20
	DJS Follow up communication from Jesus Pena regarding updating of Receiver's website, review same, prepare/send follow up communication to Jesus Pena, and prepare/forward same to Berger Singerman and George Shoup.	0.10
	DJS Communication from Sandra Orta/Eisinger to Ana Costales requesting Owner Ledgers relative to preparation of NOLAs and review same and prepare/send follow up communication regarding same.	0.20
	DJS Multiple communications and teleconferences with Truist Representatives regarding initiation of wire transfers for certain vendors, review forms forwarded, prepare/transmit same, and review additional forms forwarded, finalize same, and prepare/transmit same to Truist Bank.	0.40
	DJS Multiple communications to/from/with Tom Fiore and Jennifer Bermudez regarding Estoppel Certificate and preparation of same and coordination with Preferred Accounting for same and prepare/send multiple follow up communications regarding same.	0.20
05/22/2024	DJS Meeting with representatives of The Keyes Group regarding property related issues and status.	1.00

		HOURS
	DJS Communication from George Shoup forwarding Truist Wire Form, process same, and prepare/transmit same to Truist Bank for commencement of wire payment to Vendor.	0.10
	DJS Communication from Bill Fullwood/BBS Builders regarding site visit with Mark Leblanc and prepare/send follow up communication regarding same.	0.10
	DJS Multiple communications to/from/with Truist Bank regarding wire request and multiple teleconference with Truist Bank representatives regarding wire, and prepare/execute wire forms and transmit same to Truist Bank.	0.20
	DJS Communication from Alex Alonso regarding discussions with potential management firms, review same, and prepare/send follow up communication regarding same.	0.10
	DJS Communication from George Shoup forwarding communications to/from/with Joseph Garcia/Verliance regarding insurance related issues and status, review same, and follow up communication from George Shoup in response to same and review same.	0.10
05/25/2024	DJS Communication from Joe Pardo/Association Counsel regarding outstanding invoices, review same, and prepare/send follow up communication to George Shoup, Brian Rich, and Michael Niles regarding same, and prepare/send follow up communication to Joseph Pardo.	0.10
	DJS Communication from Jesus Pena regarding status of updating Receiver's web page and prepare/send follow up communication to Jesus Pena, George Shoup, Brian Rich, and Michael Niles regarding same.	0.10
05/28/2024	DJS Communication from ██████████ ██████████ regarding permit status related issues and expiration of same, review same, review related information/documentation, and prepare/send follow up communication regarding same.	0.20
	DJS Prepare/send communication to George Shoup regarding communications to/from/with Joseph Garcia/Verliance Insurance and status of same and additional follow up communication from Joseph Garcia regarding same.	0.10
	DJS Communication from George Shoup forwarding voicemail message from electrician regarding repairs and status and additional work to be performed, review same, and prepare/send follow up communication regarding same.	0.10
	DJS Review Mark Leblanc/Specialty Engineering correspondence regarding On-Site Observations of Building 9 and Preliminary Inspection of same and prepare/send follow up communication to Mark Leblanc.	0.50

		HOURS
	DJS Communication from Ana Costales regarding processing of payables and next steps, follow up communication from George Shoup regarding same, and prepare/send follow up communication to George Shoup regarding next steps.	0.10
	DJS Perform permit review/research relative to [REDACTED] after communication from [REDACTED] [REDACTED] regarding permit expiration related issues and prepare/send follow up communication to [REDACTED] [REDACTED] regarding same and next steps and follow up communication from David Bakalar regarding same, review same,	0.70
	DJS Correspondence from Bill Fullwood/BBS Builders regarding Building 9 inspection and work to be performed, review same, and prepare/send follow up communication to Bill Fullwood and perform additional research regarding shoring issues.	0.50
	DJS Communication from George Shoup to Ana Costales/Preferred Accounting regarding Accounts Payable and processing of same, review same, and prepare/send follow up communication to Ana Costales regarding same and multiple follow up communications to/from/with Ana Costales regarding processing and related issues.	0.10
	DJS Additional review of previously issues reports/correspondence/findings relative to buildings and City of Pembroke Pines related issues.	0.30
05/29/2024	DJS Multiple communications to/from/with [REDACTED] [REDACTED], David Bakalar, and Brian Rich regarding [REDACTED] related issues, concerns, issues and prepare/send additional follow up regarding same.	0.20
	DJS Video call with Brian Rich and Michael Niles and David Bakalar/Counsel for [REDACTED] and [REDACTED] [REDACTED] (partial) regarding matter and status and follow up video call with Michael Niles and follow up communications to/from/with David Bakalar regarding same.	0.80
	DJS Multiple communications to/from/with Michael Niles regarding [REDACTED] and related issues and perform research regarding same.	0.20
	DJS Review multiple communications from Unit Owners/Leasing Agents/Management Companies regarding leasing related issues, need to remit monthly/special assessments, contact information and prepare/send follow up communications to Unit Owners/Leasing Agents/Management Companies in response.	1.20
	DJS Communication from Mark Leblanc regarding next steps in inspection/analysis, review same, and prepare/send follow up communication to Mark Leblanc in response to same with next steps.	0.10
	DJS Communication from Michael Niles regarding	

		HOURS
	insurance related issues/status, review same, and follow up communication from George Shoup and review/discuss same with George Shoup.	0.10
DJS	Teleconference with CBO Pizzillo regarding permit status and extension related issues and prepare/send follow up communication to CBO Pizzillo and prepare/send follow up communication to Brian Rich, Michael Niles, and George Shoup.	0.10
05/30/2024	DJS Follow up communication from Eisinger Law to Ana Costales/Preferred Accounting requesting updated Owner Ledgers for use in collection efforts, review same, and prepare/send follow up communication to Ana Costales/Eisinger Law in response to same and follow up communication from Crystal Zhang/Preferred Accounting forwarding requested Ledgers and historical ledgers and review same.	0.20
DJS	Visit City of Pembroke Pines, meet with CBO Pizzillo, and retrieve building plans data visit property and meet with Jennifer Bermudez/Gianinne Hurtado regarding property management and e-mail related issues/status and multiple follow up calls with Jennifer Bermudez regarding same.	2.10
DJS	Multiple communications to/from/with George Shoup and Joseph Garcia/Verliance regarding open invoice and status of same, review same, and discuss same with Jennifer Bermudez and previous action(s) regarding same.	0.10
DJS	Multiple teleconferences with Mark Leblanc/Specialty Engineering regarding investigation status and next steps and issues relative to BBS Builders.	0.30
DJS	Communication from Alessandra Stivelman regarding property management related issues/status and prepare/send follow up communication to Alessandra Stivelman in response to same.	0.10
DJS	Communication from George Shoup forwarding Ben Meyers communication with property insurance quotes and table involving same, review same, and prepare/send follow up communication to George Shoup and Michael Niles, Brian Rich, and Jeff Wertman regarding setting of call.	0.20
DJS	Process downloading of Pembroke Pines data as obtained, review same, and communications to/from/with George Shoup, Michael Niles, and Marc Leblanc and Bill Fullwood and prepare/send follow up communication regarding same.	0.20
05/31/2024	DJS Video call with George Shoup and Brian Rich and Michael Niles and Ben Meyers regarding insurance related issues and potential coverages and continued call regarding	

		HOURS
	insurance and related issues.	0.80
DJS	Communication from Michael Niles forwarding draft communication to David Bakalar regarding [REDACTED] as prepared by Jeff Wertman, review same, and prepare/send follow up communication regarding sending of same to David Bakalar.	0.20
DJS	Multiple communications from Alessandra Stivelman forwarding potential management company information/documents and review same.	0.30
DJS	Communication from David Bakalar/Counsel for [REDACTED] with further information and review same.	0.10
06/03/2024	DJS Prepare/send follow up communication to Alessandra Stivelman regarding forwarding of management company related information.	0.10
DJS	Review Accounts Payable checks received from Ana Costales, process same and discuss same with Stacey Cooper, and prepare/send follow up communication to Ana Costales regarding same.	0.20
DJS	Multiple video calls with George Shoup regarding various banking and financial issues/status and online access to Popular and Truist.	0.20
DJS	Additional banking related issues and communications to/from/with George Shoup and Cheryl Glick/Popular Bank, download certain eStatements, and prepare/send same to George Shoup.	0.20
06/04/2024	DJS Communications to/from/with George Shoup and Ana Costales regarding banking/financial issues/status and providing of monthly bank statements and review same.	0.10
DJS	Communication from [REDACTED] regarding June 2024 invoices for shorings, fences, and manlift, prepare/send follow up communications to George Shoup regarding same, review payment records regarding same, and prepare/send follow up communication to [REDACTED] regarding same and provide Vendor History through May 2024 and additional follow up communications to/from/with George Shoup regarding next steps and prepare/send follow up communication regarding same and follow up communication from [REDACTED] regarding same and prepare/send further follow up to [REDACTED].	0.30
DJS	Teleconference with Brian Rich regarding [REDACTED] related issues and status and next steps.	0.10
DJS	Communication from George Shoup regarding wires to be processed, prepare/execute necessary forms, and prepare/send same to Truist representatives for processing and review follow up communication to George Shoup to Ana	

		HOURS
	Costales regarding wires to be sent/invoices paid.	0.10
DJS	Teleconference with Truist Bank representative regarding processing wires for payment per submissions.	0.30
DJS	Additional communication from Truist Bank regarding wire processing, review/process forms, and prepare/send same to Truist Bank.	0.10
DJS	Follow up communication from Zaina Alsous/WeCount regarding worker/payment related issues and follow up communications to/from/with [REDACTED] [REDACTED] regarding same and review same.	0.10
DJS	Communications from Eisinger Law with invoices, review same, and prepare/send follow up communication to Eisinger Law regarding same and updating/revisions to same and follow up communications to/from/with George Shoup regarding same.	0.10
DJS	Prepare/send communication to Professionals regarding upcoming deadline regarding submission of Professional Fee Summaries and issues relative to same.	0.20
DJS	Additional communications to/from/with Eisinger Law regarding updated/revised invoices and status related issues.	0.10
DJS	Separate communications from David Bakalar/Counsel for [REDACTED] and [REDACTED] regarding status related issues of construction and related issues, review same, and prepare/send follow up communication to David Bakalar in response to same and prepare/send follow up communication to [REDACTED] [REDACTED] regarding same.	0.20
DJS	Communication from Michael Niles with draft Disclosure for Prospective Tenants, review same, and prepare/send follow up communication with proposed comments, edits, and suggestions to same.	0.30
06/05/2024	DJS Communication from George Shoup to Ana Costales regarding updated/revised Cash File and status related issues and follow up communication from Ana Costales regarding same and review same.	0.10
06/06/2024	DJS Prepare/send communication to Unit Owner/Tenant Distribution List regarding recommencement of leasing with new Disclosure and review multiple incoming e-mails regarding leasing of Units and prepare/send multiple follow up communications to incoming e-mails about leasing related issues.	0.30
DJS	Teleconference with Jennifer Bermudez/West Broward Management regarding leasing e-mail sent to Unit Owners and next steps.	0.20
DJS	Communication from Ana Costales with	

		HOURS
	updated/revised Cash Activity workbook and review same.	0.10
DJS	Video call with George Shoup regarding contact by ACG Engineering and George Shoup teleconference with ACG.	0.10
DJS	Multiple teleconferences with Brian Rich regarding construction/engineering related issues at property and follow up with Mark Leblanc and follow up with David Bakalar/ [REDACTED] and review Brian Rich communication to David Bakalar requesting call.	0.40
DJS	Communication from Brian Rich to David Bakalar/Counsel for [REDACTED] regarding status of work and issues related to same and communication from Jeff Wertman regarding same and additional communications to/from/with Brian Rich and Jeff Wertman regarding same, and prepare/send follow up communication regarding same.	0.20
DJS	Review George Shoup communication with [REDACTED] workbook based upon documents/information provided by [REDACTED] [REDACTED] and review related information.	0.20
06/07/2024	DJS Communication from Gianinne Hurtado regarding parking related issues and leasing related issues and prepare/send follow up communication regarding same.	0.10
DJS	Communication from Michael Niles to Ben Meyers regarding insurance status and related issues and prepare/send follow up communication regarding same and multiple follow up communications to/from/with Ben Meyers and Michael Niles and prepare/send follow up communication regarding same.	0.10
DJS	Follow up communication from David Bakalar/Counsel for [REDACTED] regarding availability and prepare/send follow up communication regarding setting of meeting to discuss work status and next steps.	0.10
DJS	Multiple communications to/from/with David Bakalar, [REDACTED], Brian Rich, and Jeff Wertman regarding [REDACTED] issues, teleconference with David Bakalar regarding same, review [REDACTED] [REDACTED] provided documents/information, and participate in video call with [REDACTED] [REDACTED], David Bakalar, Brian Rich, and Jeff Wertman regarding work status and contract related issues.	1.60
DJS	Communication from Potential Construction Contractor regarding status of matter and prepare/send follow up communication regarding same to Potential Construction Contractor.	0.10
06/10/2024	DJS Communication from Michael Niles with draft Receiver's Emergency Motion for Authority to	

		HOURS
	Enter Into Insurance Policies and Insurance Premium Finance Agreement, review same, and prepare/send follow-up communication with proposed comments, edits, and suggestions to same and prepare/forward same to Ben Meyers for assistance regarding insurance quotes and related information and multiple follow-up communications to/from/with Ben Meyers and Michael Niles regarding same and prepare/send additional follow-up communications regarding same.	0.30
DJS	Communication from Jeff Wertman regarding engineering-related issues and prepare/send follow-up communication with link to City of Pembroke Pines site.	0.10
DJS	Communication from Gianinne Hurtado regarding parking-related issues, review same, and prepare/send follow-up communication to Gianinne Hurtado in response to same.	0.10
DJS	Communication from Jennifer Bermudez forwarding DBPR correspondence regarding investigation, review previous DBPR correspondence/communications, and prepare/send follow-up communication to DBPR and Jennifer Bermudez, and teleconference with DBPR representative regarding matter status and prepare/send follow-up communication to Alex Alonso/Alessandra Stivelman regarding same and provide explanation as to same.	0.20
06/11/2024	DJS Communication from Joe Pardo regarding DBPR contact and prepare/send follow-up communication to Joe Pardo regarding interactions with DBPR.	0.10
	DJS Prepare/send communication to Jesus Pena regarding latest filings and uploading same to Receiver's website.	0.10
	DJS Communication from Joseph Pardo regarding pending litigation commenced by Association and invoice-related issues, review same, and follow-up communication from Michael Niles regarding same.	0.10
	DJS Communication from Alejandra Ossa/ACG Engineering forwarding two open invoices, review same, and prepare/send follow-up communication regarding same to Alejandra Ossa and ACG Team/Counsel, and prepare/send follow-up communication to George Shoup regarding processing the April 2024 invoice.	0.30
	DJS Communication from Carmen Martinez/Assured Partners with updated/revised draft of Insurance Motion with certain policy information, review same, and follow-up communication from Michael Niles regarding same and prepare/send follow-up communication regarding same to Michael Niles regarding next	

	HOURS
steps with Motion and potential supplementing of same and additional communications to/from/with Michael Niles regarding same, and next steps regarding same and prepare/send follow-up communications to Michael Niles.	0.30
DJS Video call with George Shoup regarding upcoming Receivership Meeting and preparation of information for same and processing of certain payables and issues related to same.	0.50
DJS Voicemail message from Counsel for ACG regarding invoice status and review same, and communication from Counsel for ACG regarding invoice status and next steps, review same, and prepare/send follow-up communication to ACG Counsel.	0.20
DJS Communication from George Shoup forwarding Accounts Payable workbook to Ana Costales for processing, review same, and prepare/send follow-up communication regarding same.	0.10
DJS Communication from Gianinne Hurtado with Parking Rule and Regulations document, review same, and prepare/send follow-up communication regarding same.	0.10
DJS Additional communications to/from/with Michael Niles with updated/revised Receiver's Motion for Authority to Enter Into Insurance Policies and Insurance Premium Finance Agreement, review updated/revised draft, prepare/send follow-up communication with comments, edits, and suggestions to same and transmit to Michael Niles, and prepare/send follow-up communication to Ben Meyers and Carmen Martinez regarding additional information needed.	0.30
DJS Communication from George Shoup to Jennifer Bermudez regarding certain Accounts Payable-related issues/invoices and review same.	0.10
DJS Communication from George Shoup regarding ACG Engineering and related issues, and payment history, and review various documents and information regarding same.	0.30
DJS Communication from Michael Niles with Receiver's Meeting script and initial review of same.	0.10
06/12/2024 DJS Additional communication from Michael Niles with updated/revised Receiver's Motion for Authority to Enter into Insurance Policies and Insurance Premium Finance Agreement, review same, review Michael Niles communication to Assured Partners regarding need for additional information, prepare/send follow-up communication to Assured Partners regarding same, and prepare/send follow-up communication to Michael Niles with comments, edits, and suggestions to same.	0.30

		HOURS
	DJS Prepare/send follow-up communication to ██████████ ██████████ regarding follow-up deliverables from conference call had June 7, 2024, and status of same and follow-up communication from ██████████ ██████████ regarding same.	0.10
	DJS Communication from Gianinne Hurtado regarding gate-related issues and obtaining estimates for same, review same, and prepare/send follow-up communication in response to same to Gianinne Hurtado.	0.10
	DJS Teleconference with Brian Rich regarding preparation of Insurance Motion and status of same, communication from Michael Niles with latest updated draft of same, review same, and prepare/send follow-up communication regarding finalization and filing of same.	0.20
	DJS Prepare/send communication to ██████████ ██████████ with regard to ongoing rain event and Building status during same.	0.10
	DJS Communication from Court with as filed Receiver's Motion for Authority to Enter into Insurance Policies and Insurance Premium Finance Agreement and Notice of Special Set Hearing, review same, follow-up communication from Michael Niles regarding same, and prepare/send communication to Jesus Pena regarding uploading same to Receiver's site, and prepare/send follow-up communication to Michael Niles.	0.10
06/13/2024	DJS Visit Heron Pond Property and meet with ██████████ ██████████ and discuss/review construction-related issues and site visit.	2.10
	DJS Teleconference with Mark Leblanc regarding status of Building 9 review/investigation.	0.20
	DJS Communication from Jeff Wertman regarding engineering firm-related issues and status, review same, and prepare/send follow-up communication regarding same.	0.10
	DJS Communication from Court in Yuga Corp v. Heron Pond matter with as entered Agreed Order Granting Motion to Transfer and review same.	0.10
	DJS Review various ACG documents, correspondence, and contracts as it relates to Buildings 2 and 3, and latest information regarding same and prepare/send follow-up communication to Brian Rich, Michael Niles, and George Shoup regarding same and prepare/send communication to ACG regarding invoices, Agreement, and December 2023 Correspondence.	0.80
	DJS Communication from Jeff Wertman forwarding engineering proposals received, initial review of same, and prepare/send follow-up communication to Jeff Wertman.	0.20
	DJS Multiple teleconferences and communications to/from/with Brian Rich and Michael Niles	

		HOURS
	regarding construction/engineering-related issues and status, and potential next steps.	0.60
	DJS Call with George Shoup on case update.	0.10
06/14/2024	DJS Visit Heron Pond with Mark Leblanc and Bill Fullwood and respective teams to inspect Building 9 and observe same, multiple teleconferences with Brian Rich regarding same, teleconference with George Shoup regarding same, and meet with [REDACTED] [REDACTED] while on site.	3.40
	DJS Communication from George Shoup to Ocean Bank regarding remaining/open account at Ocean Bank and change of signature cards and review same, and prepare/send follow-up communication to Ocean Bank.	0.10
	DJS Communication from eForensics with invoice for IT/website services, review same, prepare/forward same to George Shoup, and prepare/send follow-up communications to eForensics requesting W-9 and updated/revised invoice.	0.10
	DJS Communication from Bill Fullwood/BBS Builders with invoice, review same, and prepare/forward same to Michael Niles, and prepare/send follow-up communication to Bill Fullwood regarding same.	0.10
06/17/2024	DJS Communication from Jeff Wertman regarding engineering firm communications for inspections of Buildings and prepare/send follow-up communication to Jeff Wertman.	0.10
	DJS Process Accounts Payable prepared by Ana Costales.	0.10
	DJS Video call with George Shoup regarding Accounts Payable processing and related issues.	0.10
	DJS Review Anonymous Correspondence addressed to FBI as received and prepare/forward same to Brian Rich, Michael Niles, and George Shoup.	0.20
	DJS Communication from Ben Meyers regarding insurance-related issues and forwarding of quotes/documents related to same, review same, and prepare/send follow-up communication to Ben Meyers regarding same and additional communications to/from/with Michael Niles regarding same.	0.30
	DJS Additional follow-up communications to/from/with Jeff Wertman regarding engineering proposals and next steps regarding same.	0.10
	DJS Communication from Michael Niles forwarding Notice of Filing Insurance Proposals, review same, and prepare/send follow-up communication to Michael Niles regarding same and communication from Court with as filed Notice of Filing Insurance Proposals and Premium Finance Agreement, and review same and prepare/forward same to George Shoup.	0.30

		HOURS
	DJS Communication from Pauline Valdes/Assured Partners with Premium Finance Agreement and Down Payment Invoice and review same and prepare/send follow-up communication to George Shoup regarding same.	0.20
	DJS Communication from Tom Fiore/West Broward forwarding Mt. Hawley/Insurance Company response to Morgan & Morgan correspondence regarding potential Sanchez matter.	0.10
	DJS Communication from George Shoup regarding Cash Forecast prepared by George Shoup as it relates to insurance premium and potential payment-related issues and review same and follow-up communication from Michael Niles regarding same.	0.10
06/18/2024	DJS Gather documents and prepare/send communication to Jesus Pena regarding updating the Receiver's website with the latest filings and Receiver/Unit Owner meeting-related information/documents, and follow-up communications to/from/with Jesus Pena regarding same.	0.20
	DJS Follow-up communications to/from/with Jeff Wertman regarding engineering-related issues and next steps and prepare/send follow-up communication regarding same.	0.10
	DJS Communication from George Shoup regarding Accounts Payable and request for processing of certain payments and status of May financials, review same, and review follow-up communication from Ana Costales regarding same.	0.20
	DJS Communication from George Shoup regarding pool contractor invoice, review same, and prepare/send follow-up communication to Jennifer Bermudez/Gianinne Hurtado regarding service status and follow-up communication from Jennifer Bermudez regarding same and prepare/send additional follow-up regarding same.	0.20
	DJS Additional communication from George Shoup to Ana Costales regarding processing of Accounts Payable and review additional invoice for same.	0.10
	DJS Communication from George Shoup regarding wire transfer to be initiated, review and process form, and prepare/send same to Truist Bank.	0.10
	DJS Communication from George Shoup to Assured Partners regarding finalization of insurance policy/premium finance agreement and review same, and review additional follow-up regarding same and multiple follow-up communications to/from/with Pauline Valdes/Assured Partners regarding finalization of documents and transmission of same.	0.30
06/19/2024	DJS Communications to/from/with George Shoup	

		HOURS
	regarding request for wire at Truist Bank and status of same.	0.10
DJS	Communication from Jennifer Bermudez regarding contact by Unit Owner insurance company regarding inspection, review/research same, and prepare/send follow-up communication to Jennifer Bermudez regarding same.	0.20
DJS	Communication from Ana Costales/Preferred Accounting forwarding May 2024 Balance Sheet and Financials and review same.	0.30
DJS	Communication from David Bakalar/Counsel for [REDACTED] seeking status update, review same, and prepare/send follow-up communication regarding same.	0.10
DJS	Additional review of insurance-related issues/documents following up from hearing on same.	0.40
06/20/2024	DJS Update and revise various Disclosures for use for Tenants and Purchasers, prepare/send same to Michael Niles, review follow-up communication from Michael Niles, finalize updated/revised Disclosures and prepare/send same to Management and prepare/send same to Unit Owners Distribution List.	0.60
DJS	Multiple communications and teleconferences with Truist Bank regarding wire request and completion of same.	0.40
DJS	Prepare/send communication to Bill Fullwood/BBS Builders requesting W-9 for processing of payment.	0.10
DJS	Prepare/send communication to George Shoup with BBS Builders invoice and request same be processed for payment.	0.10
DJS	Prepare/send communication to Mark Leblanc/Specialty Engineering reforwarding building plans per discussion.	0.10
DJS	Communication from Tom Fiore/West Broward regarding Unit Owner Property Manager communication, and prepare/send follow-up communication to Tom Fiore and follow-up communication from Tom Fiore and review same.	0.10
DJS	Visit property and meet with Mark Leblanc and Bill Fullwood regarding Building 9 and ongoing inspection/investigation, meet with William/[REDACTED], and meet with Gianinne Hurtado regarding various management-related issues and status and follow-up calls with Brian Rich regarding same.	2.40
DJS	Communication from George Shoup to Ana Costales regarding insurance-related issues and binding of coverage and documents related to same and monthly premium finance payments due and handling of same, and review same.	0.10
DJS	Communication fro Andres Caicedo/ACG Engineering regarding outstanding invoices and	

		HOURS
	project status, review same, and prepare/send follow-up communication to Andres Caicedo in response.	0.20
DJS	Communication from George Shoup to Ben Meyers regarding binding of insurance policies and request for follow-up and review same.	0.10
DJS	Review ACG follow-up regarding invoice review and issues related to same.	0.30
06/21/2024	DJS Multiple teleconferences with Mark Leblanc regarding ACG March 2024 correspondence and issues relative to same.	0.20
DJS	Follow-up communication from George Shoup to Ocean Bank regarding closing of account and forwarding of balance and follow-up communication from Ocean Bank regarding same and follow-up communication from George Shoup with draft letter to Ocean Bank, finalize same, and prepare/send same to Ocean Bank.	0.20
DJS	Telephone conference call with George Shoup on insurance and pending matters.	0.20
DJS	Multiple communications to/from/with George Shoup and Pauline Valdes/Assured Partners regarding loss run-related issues and multiple follow-up communications regarding same and communication from Pauline Valdes forwarding DocuSign form to be completed and complete same, and additional communications to/from/with George Shoup regarding same to Jennifer Bermudez requesting same, and communication from George Shoup with draft communication to █████ █████ regarding same and prepare/send communication to █████ █████ regarding prior insurance policies/coverages and request for assistance and follow-up communication from █████ █████ regarding same and prepare/send follow-up communication to Joe Toppin requesting same.	0.70
DJS	Communication from BBS Builders forwarding Invoice #2 and review same.	0.10
DJS	Visit Property and review Building-related issues/status/conditions and potential next steps regarding same.	1.30
DJS	Review Specialty Engineering communication with Building 9 photographs and review same.	0.30
06/24/2024	DJS Prepare/forward communication to George Shoup regarding BBS Builders Invoice #2 and processing of same.	0.10
DJS	Communication from Unit Owner regarding leasing-related issues, review same, and review follow-up communication from West Broward Mgmt to Owner.	0.10
DJS	Communication from Pauline Valdes regarding insurance-related question, review same, follow-up communication from Ben Meyers	

			HOURS
		regarding same, review same, and follow-up communication from George Shoup regarding same and review same.	0.10
06/25/2024	DJS	Communication from George Shoup regarding Truist Bank and request for wire, review invoices and wire request form, and process/transmit same to Truist Bank.	0.20
	DJS	Communication from George Shoup regarding cash status, invoices status, and transfer-related issues and review same.	0.10
	DJS	Review multiple George Shoup communications to Ana Costales regarding processing of Accounts Payable and review same.	0.10
	DJS	Communication from Pauline Valdes/Assured Partners requesting DocuSign regarding loss run-related issues and process same.	0.10
	DJS	Communication from Jesus Pena regarding status of updating Receiver's website, review same, and prepare/send follow-up communication to Jesus Pena.	0.10
	DJS	Communication from George Shoup regarding initiating wire transfer to process certain Accounts Payable, review and process same, and prepare/forward same to Truist Bank, and follow-up teleconference with Truist Bank representative regarding wire transfer, and follow-up communication from Truist Bank representative regarding processing wire, process/execute forms, and prepare/transmit fully executed Wire Agreement to Truist Bank.	0.30
06/26/2024	DJS	Teleconference with Mark Leblanc regarding Building 9 inspection-related issues and status.	0.20
06/27/2024	DJS	Communication from Ocean Bank regarding closing of account and forwarding of cashier's check, review same, prepare/forward same to Stacey Cooper, and prepare/send follow-up communication to Ocean Bank.	0.10
	DJS	Communication from David Bakalar/Counsel for [REDACTED] requesting update, review related information/documentation, and prepare/send follow-up communication to David Bakalar in response to same.	0.20
06/28/2024	DJS	Visit Property and meet with Mark Leblanc/Bill Fullwood regarding ongoing building inspection/review and meet with Jennifer Bermudez/Gianinne Hurtado regarding leasing status and related issues, and prepare/send follow-up communication to Jennifer Bermudez/Gianinne Hurtado with updated/revised Disclosures.	2.90
	DJS	Discussion with Jennifer Bermudez regarding	

			HOURS	
		Disclosures and request for same in Spanish, covert same, and prepare/send Spanish version Disclosures to Jennifer Bermudez/Gianinne Hurtado and teleconference with Jennifer Bermudez regarding same.	0.20	
	DJS	Communication from Stacey Cooper regarding receipt of Ocean Bank check and prepare/send follow-up communication as to next steps regarding same, and additional follow-up communications to/from/with George Shoup and Stacey Cooper regarding same.	0.10	
	DJS	Multiple teleconferences with Brian Rich regarding ongoing inspection of Building 9 and status of same, and potential next steps.	0.60	
	DJS	Follow-up communication from David Bakalar/Counsel for ██████████ regarding status follow-up and review same.	0.10	
		Managing Business Operations	78.90	39,055.50
06/06/2024	DJS	Teleconference with Michael Seltzer regarding potential sale of property and advise not discussing same at this time and to reconnect in 30 days.	0.20	
	DJS	Communication from Interested Party to City of Pembroke Pines regarding property related issues and uses, review same, and prepare/send follow up communication regarding same to Interested Party and City of Pembroke Pines.	0.10	
06/10/2024	DJS	Communication from Interested Party in purchase of Property and prepare/send follow-up communication to Interested Party.	0.10	
06/11/2024	DJS	Follow-up communication from Interested Party regarding Property status and next steps and review same.	0.10	
06/14/2024	DJS	Communication from Broker for potential Interested Party in Property and prepare/send follow-up communication to Broker regarding same, and follow-up communication from Broker regarding response sent.	0.10	
06/19/2024	DJS	Teleconference with potential sale agent regarding potential sale process and issues related to same.	0.30	
06/21/2024	DJS	Prepare Rehab v. Sale Analysis and transmit same to Brian Rich, Michael Niles and George Shoup, and teleconference with Brian Rich regarding same.	1.20	
06/24/2024	DJS	Teleconference with Brian Rich regarding matter status and rehab v. sale related issues and potential next steps.	0.30	

			HOURS		
06/26/2024	DJS	Teleconference with Lennar representative regarding March 2024 Letter of Intent.	0.20		
	DJS	Visit Property and meet with Lamar Fisher/Team regarding potential sale process and issues related to same and prepare/send follow-up communication regarding setting of meeting.	1.40		
	DJS	Additional communications to/from/with Lamar Fisher, Brian Rich and Michael Niles regarding sale-related issues and setting of meeting.	0.10		
06/27/2024	DJS	Teleconference with Barbara Blake Boy regarding property-related issues and potential redevelopment-related issues, and prepare/send follow-up communication to Barbara Blake Boy, and multiple additional communications to/from/with Barbara Blake Boy regarding same.	0.20		
06/28/2024	DJS	Prepare/send follow-up communication to David Israel/Counsel for The Keyes Company regarding Lennar and potential sale-related issues/process and prepare/send follow-up communication to David Israel.	0.20		
		Sale of Assets	4.50	2,227.50	
05/15/2024	DJS	Communication from James Rhodes regarding status of matter and insurance and prepare/send follow up communication regarding same.	0.10		
05/20/2024	DJS	Communication from James Rhodes/former BOD member regarding insurance status and prepare/send follow up communication to James Rhodes regarding status of insurance.	0.10		
05/22/2024	DJS	Prepare/send communication to Stacey Cooper to be send to Unit Owners/Renter e-mail addresses regarding Receiver's website and follow up communication from Stacey Cooper after sending of same.	0.10		
	DJS	Communication from [REDACTED] [REDACTED] [REDACTED] as follow up to communication to [REDACTED] [REDACTED], review same, and prepare/send follow up communication to [REDACTED] [REDACTED].	0.10		
05/28/2024	DJS	Follow up communication from [REDACTED] [REDACTED] regarding matter status, review same, and follow up communication from [REDACTED] [REDACTED] with [REDACTED] [REDACTED] Rent Roll workbook, review same, and prepare/send follow up communication to [REDACTED] [REDACTED] and prepare/send follow up communication to George Shoup.	0.30		
	DJS	Prepare/send communication to Stacey Cooper with draft Unit Owner/Renter communication to be sent with Receiver's Initial Report and Receiver's Initial Inventory Report and request same to sent to all known e-mail addresses.	0.10		

			HOURS
	DJS	Additional review of ██████████ ██████████ Rent Roll workbook and prepare/send follow up communication to George Shoup regarding same and prepare/send follow up communication to ██████████ ██████████ regarding same.	0.10
	DJS	Prepare/send follow up communication to ██████████ ██████████ forwarding Receiver's Initial Report and Receiver's Initial Inventory.	0.10
	DJS	Additional follow up communications to/from/with Stacey Cooper regarding distribution of Receiver's Initial Report and Initial Inventory to Unit Owners/Renters on e-mail distribution list and prepare/send follow up communication regarding same.	0.10
05/29/2024	DJS	Communication from George Shoup with ██████████ ██████████ ██████████ Statement workbook and related information, review same, and prepare/send follow up communication to ██████████ ██████████, ██████████ ██████████, and ██████████ ██████████ with same and wire instructions.	0.20
05/30/2024	DJS	Multiple communications to/from/with George Shoup and Unit Owner regarding Unit Owner Ledger and amount outstanding for assessments and issues relative to same and review same.	0.10
	DJS	Communication from Alessandra Stivelman forwarding various communications regarding efforts to purchase Units by ██████████ ██████████, review same, and prepare/forward same, and prepare/send follow up communication to Alessandra Stivelman regarding same.	0.20
05/31/2024	DJS	Communication from ██████████ ██████████ regarding remittance of monthly maintenance and request for financial documentation and meeting and follow up communication from George Shoup forwarding wire instructions and financial documentation and follow up communication from ██████████ ██████████ regarding same.	0.20
06/04/2024	DJS	Communication from Unit Owner to George Shoup regarding Unit Owner Ledgers and Amount Outstanding and follow up communication with supporting documentation and follow up communication from George Shoup regarding same and review same.	0.10
	DJS	Communication from ██████████ ██████████ requesting meeting, review same, and prepare/send follow up communication to ██████████ ██████████ regarding same and status of monthly maintenance wire that was agreed to and additional communications to/from/with ██████████ ██████████ and George Shoup regarding monthly assessments and payment of same and prepare/send additional follow up to ██████████ ██████████ regarding same.	0.30

		HOURS
06/05/2024	DJS Follow up communication from ██████ ██████ regarding assessment related issues, review same, and prepare/send further follow up to ██████ ██████ regarding same.	0.10
	DJS Communication from Brian Rich forwarding Unit Owner communication and review same and follow up communications to/from/with Brian Rich and Michael Niles regarding same and next steps.	0.10
	DJS Prepare/send communication to Berger Singerman, Eisinger Law, and DSI regarding upcoming Community Meeting and follow up communications to/from/with Michael Niles, Alessandra Stivelman, Joshua Cole, and Brian Rich regarding same.	0.20
	DJS Communication from Michael Niles with draft proposed Receiver's Meeting Notice, review same, and prepare/send follow up communication with comments, edits, and suggestions to Michael Niles, Brian Rich, and George Shoup.	0.10
	DJS Multiple communications from Unit Owners/Property Managers regarding Association related issues and prepare/send follow up communications to Unit Owners/Property Managers.	0.20
	DJS Additional communications to/from/with Brian Rich and Michael Niles regarding Disclosure/leasing related issues and preparation of communication to Unit Owners regarding same and prepare/send follow up communications regarding same and prepare/send communications to Stacey Cooper with communication to be sent to Unit Owners regarding Disclosure/leasing issues.	0.20
06/06/2024	DJS Review latest draft of Meeting Notice and prepare/send follow up communication to Michael Niles, Brian Rich, and George Shoup for further comment.	0.10
	DJS Follow up communication from Michael Niles regarding Receiver's Meeting Notice and finalization of same, review same, and prepare/send follow up communication regarding same.	0.10
	DJS Communication from ██████ ██████ regarding matter status of remittance of monthly maintenance, prepare/forward same to Berger Singerman/DSI, review Brian Rich and George Shoup response, and prepare/send follow up to ██████ ██████.	0.20
	DJS Telephone call with ██████ ██████ and George Shoup regarding Association status, financial related issues including remittance of agreed monthly assessment amount, and insurance related issues and next steps.	0.50
	DJS Follow up teleconference with Brian Rich regarding call with ██████ ██████ and George	

		HOURS
	Shoup.	0.10
	DJS Finalizing Receivership Meeting Notice and prepare/send communication to Unit Owners/Residents regarding setting of Receivership Meeting for June 13, 2024 at 6:30 p.m.	0.10
06/07/2024	DJS Multiple communications from Unit Owners regarding recommencement of leasing and status related issues, review/research same, and prepare/send follow up communications to Unit Owners regarding same.	0.30
	DJS Additional communications to/from/with [REDACTED] regarding remittance of monthly assessment and status of same and prepare/send follow up communication to [REDACTED] [REDACTED] in response to same.	0.20
06/10/2024	DJS Communication from [REDACTED] [REDACTED] regarding wire instructions and request for additional information, review same, and review George Shoup's response providing address for Truist Bank and follow-up communication from [REDACTED] regarding Call Agenda and review same.	0.10
	DJS Video call with George Shoup and Brian Rich and Michael Niles and [REDACTED] [REDACTED], [REDACTED] [REDACTED], and [REDACTED] [REDACTED] regarding Association status, special assessments, and operational/construction-related issues.	1.00
	DJS Follow-up video call with George Shoup and Brian Rich and Michael Niles regarding previous video call with [REDACTED] [REDACTED] and Counsel.	0.10
	DJS Communication from Unit Owner regarding sale-related issues and prepare/send follow-up communication to Unit Owner regarding sale-related issues.	0.10
	DJS Follow-up communication from Unit Property Manager regarding leasing-related issues and prepare/send follow-up communication to Unit Property Manager.	0.10
	DJS Communication from Unit Owner regarding ability to lease and prepare/send follow-up communication to Unit Owner in response to same.	0.10
06/11/2024	DJS Prepare/send communication to Unit Owners providing reminder for upcoming Receivership Meeting and multiple/extensive follow-up communications to/from/with Unit Owners/Eisinger Law regarding same and prepare/send multiple extensive follow-up regarding same.	0.50
	DJS Begin preparation for upcoming Receiver's Meeting with community and review documents/information regarding same.	0.70

		HOURS
06/12/2024	DJS Additional communications to/from/with Unit Owners regarding upcoming Owners Meeting and e-mail issues.	0.20
	DJS Communication from Jennifer Bermudez forwarding communication from Unit Owner regarding not receiving e-mails and prepare/send follow-up communication to Unit Owner and review/modify E-mail Distribution List to add e-mail addresses provided.	0.10
	DJS Multiple communications to/from/with Eisinger Law regarding upcoming Unit Owner/Receiver Meeting and issues/follow-up regarding same, and prepare/send multiple follow-up communications regarding same and review Unit Owner Registration workbook forwarded by Eisinger Law and prepare/send follow-up communication to Michael Niles regarding same.	0.40
	DJS Teleconference with Brian Rich regarding upcoming Owner's Meeting and issues relative to same.	0.20
	DJS Video call with George Shoup, Michael Niles, Alessandra Stivelman, Alex Alonso, and Joshua Cole regarding upcoming Owners Meeting and preparation for same, and follow-up video call with George Shoup regarding same.	0.60
06/13/2024	DJS Communication from Joshua Cole/Eisinger regarding upcoming Unit Owner/Receiver meeting, review same, and prepare/send follow-up communication regarding same.	0.10
	DJS Multiple communications to/from/with Unit Owners regarding Unit Owner/Receiver meeting and issues relative to same and prepare/send follow-up communications to Unit Owners.	0.20
	DJS Communication from Unit Owner regarding roof leak into Unit, review same, and prepare/send follow-up communication to Tom Fiore/West Broward regarding same and prepare/send follow-up communication to █████ █████ regarding same, and follow-up communication from Unit Owner and prepare/send follow-up communication to Unit Owner, and additional communications to/from/with Tom Fiore regarding same.	0.20
	DJS Communications from Unit Owner regarding upcoming Receiver/Unit Owner Meeting and prepare/send follow-up communication regarding same to Unit Owner.	0.10
	DJS Communication from Michael Niles forwarding updated/revised script for Owner/Receiver Meeting and initial review of same.	0.30
	DJS Communication from Unit Owner regarding upcoming meeting and request for link and prepare/send follow-up communication to Unit Owner providing same.	0.10
	DJS Multiple teleconferences with Brian Rich and	

		HOURS
	Michael Niles regarding upcoming Receiver/Unit Owner meeting and issues relative to same.	0.40
DJS	Prepare for upcoming Receiver/Unit Owner meeting.	0.70
DJS	Attend Receiver/Unit Owner video call with George Shoup, Brian Rich, Michael Niles, and Alessandra Stivelman and attend follow-up video call with George Shoup, Brian Rich, Michael Niles and Alessandra Stivelman.	1.30
06/14/2024	DJS Multiple communications from Noteholders following Unit Owner/Receiver meeting and follow-up regarding same and prepare/send multiple follow-up communications to Unit Owners in response.	0.20
	DJS Communication from Michael Niles with draft communication to Unit Owners and communication from Brian Rich regarding same, review same, and prepare/send multiple communications to Michael Niles, Brian Rich, and George Shoup regarding same and additional follow-up communications to/from/with Michael Niles regarding same.	0.60
	DJS Communication from Unit Owner regarding ledger balances and related issues and prepare/send follow-up communication to Unit Owner and Jennifer Bermudez regarding same.	0.10
	DJS Communication from Unit Owner regarding remittance of special assessment and issues related to same, and prepare/send follow-up communication to Unit Owner in response to same, and additional communications to/from/with Unit Owner regarding same.	0.20
	DJS Communication from Unit Owner regarding payment of Special Assessment and related issues and prepare/send follow-up communication regarding same to Unit Owner.	0.10
	DJS Video calls with George Shoup on owner communication.	0.40
	DJS Additional communications to/from/with Michael Niles, Brian Rich, and George Shoup regarding communication to be sent to Unit Owners with Poll, review/edit/revise same, multiple teleconferences with Brian Rich regarding same, and prepare/send communication to Unit Owners.	0.50
	DJS Additional communications to/from/with Unit Owner regarding Special Assessment-related issues and prepare/send follow-up communication to Unit Owner in response to same.	0.10
06/17/2024	DJS Communication from Michael Niles regarding communication sent to Unit Owners with Poll, review same, prepare/send follow-up communication to Michael Niles regarding same, and prepare/send communication to Unit Owners with Poll.	0.10

	HOURS
DJS Communication from Unit Owner providing updated contact information/mailing address and request for Owner's Ledger, and prepare/send follow-up communication regarding same to Unit Owner.	0.10
DJS Follow-up communication from Unit Owner to previous communications and requests and review same.	0.10
DJS Prepare/send communication to Unit Owners with Poll.	0.10
DJS Follow-up communication from Unit Owner to Unit Owner's communication with Poll and review same.	0.10
DJS Communication from Unit Owner regarding Poll-related issues and prepare/forward same to Michael Niles and prepare/send follow-up communication to Unit Owner.	0.10
DJS Communication from Unit Owner regarding link to Poll and issues relative to same and prepare/send follow-up communication to Unit Owner regarding same.	0.10
DJS Communication from Unit Owner regarding Poll and link issues and prepare/send follow-up communication to Unit Owner.	0.10
DJS Communication from Unit Owner regarding Poll link and access to same and prepare/send follow-up communication to Unit Owner regarding same.	0.10
DJS Communication from Michael Niles with initial review of Poll results, review same, and prepare/forward same to George Shoup, and review follow-up communication from George Shoup regarding same and prepare/send follow-up communication to Michael Niles regarding same.	0.10
DJS Additional communications to/from/with Unit Owner regarding Poll-related issues and vote, review same, and prepare/send further follow-up communication to Unit Owner.	0.10
DJS Additional follow-up communications to/from/with Unit Owner regarding Poll-related issues and vote to sell and prepare/send follow-up communication to Unit Owner.	0.10
DJS Communication from Unit Owner regarding potential sale-related issues based upon Poll-related issues and prepare/send follow-up communication to Unit Owner.	0.10
DJS Additional communications to/from/with Michael Niles regarding Poll results and follow-up regarding same, and prepare/send additional follow-up communications regarding same.	0.10
06/18/2024 DJS Communication from Unit Owner regarding Poll-related issues and prepare/send follow-up communication to Unit Owner regarding same, and additional communications to/from/with Unit Owner regarding vote and prepare/send follow-up communication to Unit Owner.	0.10

		HOURS
	DJS Communication from Unit Owner regarding communications with Unit Owners, and prepare/send follow-up communication regarding same to Unit Owner.	0.10
	DJS Communication from Unit Owner following Receiver/Unit Owner Meeting with numerous questions, review same, and prepare/send follow-up communication to Unit Owner.	0.30
	DJS Communications to/from/with Michael Niles and Brian Rich regarding Owner's Poll and issues related to same and prepare/send follow-up communications regarding same.	0.20
06/19/2024	DJS Multiple communications to/from/with Brian Rich and Michael Niles regarding Unit Owner Poll and status of same.	0.20
	DJS Prepare/send communication to Unit Owners with update regarding insurance and provide filings related to same and Poll reminder.	0.30
	DJS Review latest construction, rehabilitation, and potential sale-related issues and potential next steps.	0.60
06/20/2024	DJS Communication from Unit Owner regarding questions regarding Special Assessment-related issues and status and prepare/send follow-up communication regarding same to Unit Owner.	0.10
	DJS Communication from Unit Owner Management Firm regarding insurance update communication sent and prepare/send follow-up communication regarding same.	0.10
	DJS Communication from Unit Owner regarding poll and vote regarding same, review same, and prepare/send follow-up communication to Unit Owner regarding same.	0.10
	DJS Prepare/send follow-up communication to Unit Owner forwarding insurance communication previously sent due to return due to size.	0.10
	DJS Communication from Unit Owner requesting updated Disclosure to remove insurance issue and prepare/send same to Unit Owner.	0.10
	DJS Communication from Unit Owner forwarding vote for Poll, review same, and prepare/send follow-up communication to Unit Owner, and additional follow-up communications to/from/with Michael Niles regarding same.	0.10
	DJS Communication from Unit Owner Property Manager requesting meeting, communication from Tom Fiore regarding same, and prepare/send follow-up communication to Unit Owner Property Manager in response to same.	0.20
	DJS Communication from Unit Owner Property Manager regarding status of units, review same, and prepare/send follow-up communication to Property Manager.	0.10
	DJS Communication from Unit Owner regarding	

			HOURS
		sale-related issues and disclosures and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner/Construction Committee Member forwarding communication regarding Construction Committee and related documents, review same, and prepare/send follow-up communication to Unit Owner/Construction Committee Member, and teleconference with Brian Rich regarding same and issues related to same.	1.10
	DJS	Communication from Unit Owner regarding sale-related issues and next steps, and prepare/send follow-up communication to Unit Owner.	0.10
06/21/2024	DJS	Communication from Unit Owner Counsel regarding matter-related issues/status and prepare/send follow-up communication to Unit Owner Counsel in response, and additional follow-up communications to/from/with Counsel regarding same.	0.30
	DJS	Communication from Unit Owner regarding vote to be included in straw poll and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Brian Rich to ██████████ ██████████/██████████ ██████████/██████████ ██████████ regarding request for meeting and follow-up communication from ██████████ ██████████ regarding same and review same.	0.10
	DJS	Updated communication from Michael Niles with latest Poll information and review same.	0.10
06/24/2024	DJS	Communication from Unit Owner regarding Poll-related issues and vote preference and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner with updated Contact Information Sheet, review same, and prepare/forward same to Stacey Cooper and West Broward Mgmt.	0.10
06/25/2024	DJS	Prepare/send additional follow-up communication to ██████████ ██████████ and ██████████ ██████████ and ██████████ ██████████ regarding setting of call to discuss status of certain issues.	0.10
	DJS	Communication from Unit Owner requesting current Owner's Ledgers for units owned, review same, and prepare/send follow-up communication to Unit Owner and requesting forwarding of Ledgers to Unit Owner.	0.10
	DJS	Communication from Unit Owner regarding rental status and key status, and prepare/send follow-up communication to Unit Owner regarding same.	0.10
	DJS	Communication from Unit Owner requesting	

		HOURS
	balance due and prepare/send follow-up communication to Unit Owner, and request Management provide same.	0.10
DJS	Additional follow-up communications to/from/with Unit Owner regarding request for Owner Ledger and prepare/send follow-up communication to Unit Owner.	0.10
DJS	Prepare draft proposed communication to Unit Owners regarding Special Assessment and teleconferences with Brian Rich regarding same.	2.30
06/26/2024	DJS Video call with George Shoup regarding ██████████ ██████████-related issues.	0.20
DJS	Additional drafting of proposed communication to Unit Owners regarding Special Assessment/Rehabilitation Project and prepare/send same to Brian Rich, Michael Niles, and George Shoup.	0.60
DJS	Draft communication to ██████████ ██████████, ██████████ ██████████ and ██████████ ██████████ regarding request for meeting and issues relative to rehabilitation/special assessment and potential next steps, and follow-up communication from Brian Rich regarding same.	0.20
DJS	Meeting at Property with Unit Owner, Jennifer Bermudez and Gianinne Hurtado regarding rehabilitation/special assessment/sale-related issues/status.	0.60
DJS	Additional communication to/from/with ██████████ ██████████ representatives ██████████ ██████████ and ██████████ ██████████ and Brian Rich regarding rehab/sale-related issues and review same, and discuss same with Brian Rich, and additional communications to/from/with Brian Rich and Michael Niles regarding same.	0.20
DJS	Communication from Unit Owner regarding rekeying of Unit, review same, and prepare/send follow-up communication to Unit Owner.	0.10
DJS	Communication from Unit Owner representative regarding Special Assessment-related issues and prepare/send follow-up communication to Unit Owner representative responding to questions raised.	0.20
DJS	Communication from Unit Owner representative regarding Special Assessment-related issues and prepare/send follow-up communication to Unit Owner representative responding to questions raised and issues relative to same.	0.10
06/27/2024	DJS Conduct research regarding Unit Owner-related issues and update/revise Unit Owner Workbook with same, and communications to/from/with Stacey Cooper regarding same, and prepare/forward same to Jennifer Bermudez/Gianinne Hurtado for further updating.	4.40

			HOURS
06/28/2024	DJS	Communication from Unit Owner regarding leasing-related issues and request for assistance regarding same and review same.	0.10
	DJS	Finalize communication to Unit Owners regarding Special Assessment and prepare/send same to Unit Owners.	0.30
	DJS	Follow-up communication from Unit Owner regarding Special Assessment and particulars of same, and prepare/send follow-up communication to Unit Owner regarding same.	0.10
	DJS	Communication from Unit Owner regarding chat group and request for information, and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Follow-up communication from Unit Owner after Special Assessment E-mail regarding leasing of Unit and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner regarding Poll results and prepare/send follow-up communication to Unit Owner and provide same.	0.10
	DJS	Follow-up communication from Unit Owner regarding Special Assessment and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner regarding communication-related issues and vehicles for doing same, and prepare/send follow-up communication to Unit Owner.	0.10
	DJS	Communication from Unit Owner representative regarding Special Assessment and remittance of same, and link to same, and prepare/send follow-up communication to Unit Owner representative regarding same.	0.10
		Shareholdr Contact/Rltd Issues	31.20
			15,444.00
04/30/2024	DJS	Communication from Michael Niles with Receiver's Notice of Filing Receiver's Bond, Receiver's Notice of Filing Oath of Receiver, and Receiver's Notice of Filing Introductory Letter to Unit Owners, review same, and prepare/send follow up communication to Michael Niles regarding same.	0.10
	DJS	Communications to/from/with Michael Niles regarding Introductory Letter and preparation/filing of Certificate of Service and issues related to same.	0.10
05/01/2024	DJS	Communication from Stacey Cooper regarding receipt of original Receiver's Bond, review same, prepare/send follow up communication to Stacey Cooper, and prepare/send follow up communication to Berger Singerman regarding same and additional communications to/from/with Berger Singerman regarding handling/filing of original bond.	0.20

			HOURS
05/02/2024	DJS	Communication from Michael Niles with draft proposed Emergency Motion for Instructions, communications from George Shoup regarding same, review same, and prepare/send follow up communications with comments/edits/suggestions to same and teleconference with Michael Niles regarding same and further/additional communications to/from/with Michael Niles with updated/revised draft proposed Motion, review same, and prepare/send follow up communication to Michael Niles with additional comments.	0.60
05/03/2024	DJS	Multiple teleconferences with Michael Niles regarding draft Emergency Motion and issue/status related to same.	0.30
	DJS	Communication from Michael Niles regarding Ben Solomon/Former Counsel for Association, review and research same, review draft Demand for Turnover/Preservation Letter and prepare/send follow up communication to Michael Niles regarding same.	0.10
05/06/2024	DJS	Communication from Michael Niles regarding efforts to contact Ben Solomon/Former Association Counsel and lack of response, review proposed turnover/preservation letter, and prepare/send follow up communication as to next steps to Michael Niles and follow up communication from Michael Niles to Ben Solomon and further communications to/from/with Michael Niles about next steps with Ben Solomon.	0.20
	DJS	Communication from Michael Niles with draft Notice and Motion to Transfer to Receivership Court, review same, and prepare/send follow up communication to Michael Niles on next steps and additional communications to/from/with Michael Niles regarding same.	0.30
05/07/2024	DJS	Communication from Luis Torres regarding filing of original Receiver's Bond with Clerk's Office and Order related issues, review same, and prepare/send follow up communication regarding same.	0.10
	DJS	Communications to/from/with Berger Singerman regarding setting of hearings before Court and potential dates for same, communication from Michael Niles regarding same, and prepare/send follow up communication regarding same.	0.10
	DJS	Prepare/send communication to Michael Niles regarding pleading related issues and request for same and follow up communication from Michael Niles with same.	0.10
05/14/2024	DJS	Communications to/from/with Brian Rich and Jeff Wertman regarding upcoming hearing before Court and attendance at same.	0.10

		HOURS
	DJS Multiple communications from the Court regarding Special Set Hearing and cancellation of same and follow up e-mails regarding same and multiple follow up communications to/from/with Michael Niles and Brian Rich regarding same and prepare/send follow up regarding same and multiple additional follow up communications to/from/with Court, Brian Rich, and Michael Niles and prepare/send additional follow up regarding same.	0.20
	DJS Communication from Court in Yuga v. Heron Pond matter regarding scheduling of hearing on Motion to Transfer and review same.	0.10
05/15/2024	DJS Communication from Court regarding resetting of Hearing before Judge Tuter regarding retention motions and review same.	0.10
05/20/2024	DJS Video call with Brian Rich, Michael Niles, and Jeff Wertman in advance of upcoming hearing before Court regarding issues/status.	0.20
	DJS Communication from Michael Niles regarding Court's request for photographs of structural issues, review reports/files/documents, and prepare/send follow up communication to Michael Niles.	0.20
05/22/2024	DJS Communication from Michael Niles with draft Notice of Filing Photographs, review same, and prepare/send follow up communication with proposed comments, edits, and suggestions to same, review additional reports/information/documentation and prepare/send additional follow up communication to Michael Niles regarding same and review as filed Notice of Filing Color Photographs of Association Buildings.	0.20
06/06/2024	DJS Prepare/send communication to Berger Singerman regarding preparation of certain Notices for filing for consideration.	0.10
06/17/2024	DJS Multiple and extensive communications to/from/with Court, Michael Niles, Brian, Rich, and Jeff Wertman regarding hearing-related issues and rescheduling same and prepare/send follow-up communication regarding same.	0.10
	DJS Teleconference with Brian Rich and Michael Niles regarding hearing-related issues and preparation/finalization of related Notice of Filing and discuss same.	0.20
	DJS Multiple communications from Court with regard to resetting of hearing on Receiver's Motion for Authority to Enter into Insurance Policies and Premium Finance Agreement and review Renotice of Hearing as filed.	0.10

		HOURS	
06/19/2024	DJS	Communication from Brian Rich regarding certain potential termination-related issues, review/research same, and prepare/send follow-up communication and additional follow-up from Michael Niles regarding same.	0.40
	DJS	Teleconference with Brian Rich regarding potential next steps in matter and ongoing Poll and related issues.	0.30
	DJS	Multiple teleconferences with Brian Rich regarding matter status and potential next steps regarding same and discuss same.	0.40
		Litigation Support	4.90
			2,425.50
05/02/2024	DJS	Attend meeting at Pembroke Pines City Hall with George Shoup and Paul Figg/Michael Niles (Teams), Alex Alonso and Alessandra Stivelman, and City Representatives regarding property and status and issues related to same.	3.50
	DJS	Additional follow up telephone call with City of Pembroke Pines Representatives regarding matter status and City related issues.	0.50
05/03/2024	DJS	Multiple teleconferences with City Attorney Sam Goren regarding matter status and meeting follow up.	0.40
	DJS	Teleconference with Pembroke Pines Chief Building Official Steve Pizzillo regarding property visit with ACG Engineering Representatives and issues relative to same and prepare/send follow up communication to Hank Kreh/ACG and CBO Steve Pizzillo regarding potential next steps for exploratory/probing work.	0.40
05/04/2024	DJS	Communications to/from/with City Attorney Goren regarding status of draft proposed Notice regarding insurance status.	0.10
05/07/2024	DJS	Communication from State Attorney's Office and attempt to return call to Assistant State Attorney.	0.10
	DJS	Prepare/forward communication to City of Pembroke Pines regarding communication sent to Unit Owners regarding Insurance Notice as filed.	0.10
	DJS	Prepare/send communication to City of Pembroke Pines regarding Receiver's website and status of same.	0.10
05/13/2024	DJS	Review issues relative to site visit with engineer and Chief Building Official, review certain documents/information regarding same, and prepare/send communication to Mark Leblanc and Chief Building Official Pizzillo.	0.40

			HOURS
05/15/2024	DJS	Communication from Alessandra Stivelman forwarding response from DBPR Analysis regarding Complaint/Response and closing of matter, review same, and prepare/send follow up communication regarding same.	0.10
	DJS	Communications from Mayor and City Attorney of Pembroke Pines in response to communication from WeCount regarding work performed and workers not being paid, review same, and prepare/send follow up communication in response to same and additional communications to/from/with Michael Niles regarding same, and prepare/forward same to David Bakalar and [REDACTED] for review.	0.40
05/22/2024	DJS	Teleconference with Larry Davis regarding matter status and related issues.	0.10
06/04/2024	DJS	Communication from SAO ASA Rice and teleconference with ASA Rice regarding matter and related issues.	0.50
	DJS	Follow up teleconference with Brian Rich after discussion with SAO ASA Rice.	0.10
06/06/2024	DJS	Communication from Assistant City Manager Stamm regarding Association related issues and communication from City Attorney Goren regarding same and prepare/send follow up communication regarding same and follow up teleconference with City Attorney Goren and additional communications to/from/with ACM Stamm regarding meeting to be held and prepare/send follow up communication regarding same.	0.40
06/14/2024	DJS	Prepare/send communication ACM Stamm - City of Pembroke Pines requesting follow-up.	0.10
	DJS	Multiple follow-up communications to/from/with City Attorney Goren regarding communication to ACM Stamm and follow-up regarding same.	0.10
06/15/2024	DJS	Teleconference with City Attorney Goren regarding matter status and related issues.	0.40
	DJS	Teleconference with Property Appraiser Marty Kiar regarding property-related issues/status and valuation-related issues and prepare/send follow-up communication to Property Appraiser and provide information/documentation for review and follow-up.	0.30
	DJS	Teleconferences with Brian Rich following-up teleconferences with City Attorney Goren and Property Appraiser Kiar.	0.20
06/17/2024	DJS	Teleconference with Assistant City Manager Michael Stamm regarding property-related issues and request for information regarding same.	0.20

		HOURS	
06/19/2024	DJS	Communication from ACM Stamm with Heron Pond Entitlements and Aerial Vicinity Map and prepare/send follow-up communication to ACM Stamm, and review same and related information/issues.	0.60
	DJS	Communication from City Attorney Goren regarding meeting-related issues and status-related issues, multiple communications to/from/with Brian Rich and Michael Niles regarding same, and prepare/send follow-up communications to Brian Rich and Michael Niles, and prepare/send follow-up communication to City Attorney Goren and additional follow-up communications regarding meeting-related issues.	0.40
06/21/2024	DJS	Communication from Property Appraiser Marty Kiar regarding shuttered units and value-related follow-up, review same, and multiple follow-up communications to/from/with Michael Niles and Property Appraiser Kiar regarding same and prepare/send additional follow-up regarding same.	0.50
06/24/2024	DJS	Prepare/send communication to Property Appraiser Kiar proving Unit Owner Information Workbook for use in preparing BCPA Catastrophic Report Form, and prepare/send draft communication to Michael Niles, Brian Rich, and George Shoup regarding BCPA information and draft Unit Owner e-mail for review/comment and additional follow-up communications to/from/with Property Appraiser Kiar regarding same.	0.70
06/25/2024	DJS	Communication from Manager Maureen Morrison/BCPA regarding workbooks forwarded for potential 2023 tax refund, review/research same, and prepare/send follow-up communication to Michael Niles, Brian Rich, and George Shoup, and prepare/send follow-up communication to Maureen Morrison.	0.30
06/26/2024	DJS	Build Unit Owner workbook based upon BCPA data and information as it relates to potential tax refunds for Unit Owners.	2.70
06/28/2024	DJS	Teleconference with City Attorney's Office regarding matter status and related issues, and ongoing building investigation and review.	0.50
	DJS	Teleconference with City of Pembroke Pines Chief Building Official regarding matter status and related issues, and ongoing building investigation and review.	0.10
	DJS	Communication from ACM Stamm forwarding	

		HOURS	
	updated/ revised Heron Pond Entitlements Updated, Aerial Vicinity Map, and FLLWHO Composite Map, review same, prepare/forward same to Team Fisher, and prepare/send follow-up communication to ACM Stamm.	0.20	
	DJS Communication from ACA Hernandez regarding Receiver website-related issue and prepare/send follow-up communication to ACA Hernandez.	0.10	
	Government Contact	14.60	7,227.00
05/21/2024	DJS Communication from Michael Niles with draft proposed Receiver's Initial Report, review same, and prepare/send follow up proposed comments/edits/suggestions to same to Michael Niles and Brian Rich.	0.60	
05/22/2024	DJS Additional review of draft proposed Initial Receiver's Report, review Brian Rich comments/edits to same, and prepare/send further comments/edits/suggestions to same.	0.20	
	DJS Video call with George Shoup regarding financial aspects of matter and review/preparation of updated/ revised financial information and exhibits for Receiver's Inventory and Initial Receiver's Report.	0.50	
	DJS Review draft of Receiver's Initial Inventory Report prepared by Michael Niles, prepare/send follow up communication to Michael Niles with proposed comments, edits, and suggestions to same, multiple communications from George Shoup with proposed Exhibits to Initial Inventory and revisions to same, review same, and review follow up George Shoup communication with comments/edits/suggestions to Initial Inventory Report, review same, and prepare/send follow up communication to Michael Niles and teleconference with Brian Rich regarding same and further communications to/from/with George Shoup regarding further updating/ revising of Exhibits and review updated/ revised Exhibits forwarded by George Shoup.	0.30	
	DJS Additional communications to/from/with Brian Rich and George Shoup regarding preparation and finalization of Initial Receiver's Report and exhibit related issues.	0.10	
06/20/2024	DJS Communication from George Shoup forwarding various financial reporting for use in Receiver's Second Report, review same, and prepare/send follow-up communication to Michael Niles and Brian Rich regarding preparation of Receiver's Second Report.	0.30	
06/21/2024	DJS Communication from Michael Niles forwarding draft proposed Receiver's Second Report, review same, and prepare/send		

		HOURS		
	comments/edits/suggestions to Michael Niles, Brian Rich and George Shoup regarding same and follow-up communication from George Shoup with proposed comments, edits, and suggestions, review same, and additional follow-up communications to/from/with Michael Niles regarding same.	0.60		
06/24/2024	DJS Communication from Michael Niles with latest draft proposed Second Receiver's Report, review same, and prepare/send follow-up communication with comments, edits, and suggestions to same.	0.40		
	DJS Additional follow-up communication from Michael Niles forwarding updated/revised Receiver's Second Report, review same, and prepare/send follow-up communication with final comments, edits, and suggestions and follow-up communication from Luis Torres with finalized Receiver's Second Report, review same, and prepare/send follow-up communication regarding same.	0.40		
	DJS Review as filed Receiver's Second Monthly Report and prepare/send communication to Jesus Pena regarding uploading same to Receiver's website and other filings for upload.	0.10		
	Reports For Court	3.50	1,732.50	
	FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:	180.70	89,446.50	

RECAPITULATION

<u>CONSULTANT</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
D. J. Stermer	180.70	\$495.00	\$89,446.50
TOTAL CURRENT WORK			89,446.50
BALANCE DUE			<u>\$89,446.50</u>



REMIT TO:
 10 South LaSalle Street, Suite 3300, Chicago, IL 60603-1026
 Telephone: 312.263.4141 Telecopier: 312.263.1180

No. 14157

Date: 7/26/2024

Heron Pond Condominium Association, Inc.
 8400 SW 1st St.
 Pembrooke Pines, FL 33025-1420

F.E.I.N. 36-2967476

Description of Services and Disbursements	Fees	Disbursements	Credits	Balance
For professional services rendered through June 30, 2024:				
Fees per attached category summary:	\$91,210.00			
Administrative costs:				
Airfare		\$887.96		
Lodging		1,376.36		
Car Rental		222.39		
Meals		3.80		
Parking/Tolls/Cabs/Mileage		213.34		
Postage		1.28		
Photocopies		2.55		
Miscellaneous Charges		174.20		
		<u>\$2,881.88</u>		
Total:				\$94,091.88
TIMELY PAYMENT OF INVOICES IS ALWAYS APPRECIATED.				PAY AMOUNT ABOVE

			HOURS	
06/05/2024	GES	Review and prepare edits to DSI's time detail through May 31, 2024.	0.70	
		Fee Application/Client Billing	0.70	367.50
05/20/2024	GES	Video call with the Court regarding retention motions with Dan Stermer and Brian Rich, Michael Niles, and Jeff Wertman and Alessandra Stivelman and Alex Alonso and ACA Paul Hernandez and follow up video call with Dan Stermer and Brian Rich, Michael Niles, and Jeff Wertman.	0.70	
06/18/2024	GES	Participate in hearing on insurance motion.	0.20	
		Attend Court Hrgs/Rev Pleadgs	0.90	472.50
04/30/2024	GES	Teleconference with Dan Stermer regarding matter status and next steps.	0.20	
	GES	Telephone call from Ana Costales on bookkeeping of HOA and discuss receivership and operational matters,	0.50	
05/01/2024	GES	Video call with Dan Stermer and Brian Rich and Michael Niles and [REDACTED] [REDACTED]/Counsel for [REDACTED] [REDACTED] regarding matter and issues relative to same.	0.50	
05/09/2024	GES	Review of financial system data provided by Preferred Accounting Services and prepare and review of financial reporting capabilities of the Enumerate accounting system utilized for the COA since August 2022.	2.00	
	GES	Prepare comprehensive 2nd turnover list to Preferred Accounting Services.	2.50	
	GES	Telephone conference call with Dan Stermer on pending matters and status of financial information provided.	0.30	
05/10/2024	GES	Prepare notes to the Receiver and schedule of reported balances owed by condo owners.	0.40	
	GES	Prepare file for Jennifer Bermudez to review to assist with determining if the numerous checks outstanding as of the date of the Receivership were actually mailed to vendors or if these amounts needed to be added back into unpaid accounts payable.	0.50	

		HOURS
	GES Prepare note to Eisinger firm on owners statement accounting.	0.40
	GES Pull together financial reports in preparation of updated budget reporting.	1.50
05/14/2024	GES Attention to access to the Popular Bank accounts and review activity in the last 60 days in accounts.	0.50
	GES Review of accounting treatment of capital contributions and respond to counsel's inquiry.	0.70
05/15/2024	GES Prepare discussion topics for call with bookkeeper, Ana Costales.	0.50
	GES Video call with Dan Stermer in advance of upcoming call with Ana Costales regarding accounting/financial-related issues and status.	0.40
	GES Telephone conference call with Ana Costales on financial request(s).	0.90
	GES Coordinate access to Truist Bank accounts and pull down recent activity; review activity.	1.50
	GES Review financial reports from bookkeeper.	0.70
05/20/2024	GES Prepare initial cash reconciliation and update through May 20, 2024.	2.50
	GES Prepare 2024 monthly and 2023 income statement and reserve statement activity for budget template.	1.00
	GES Review the general ledger activity for Special Assessment accounting treatment and work to proof cash in Special Assessment account to collections received analysis of reserves spent to-date.	1.50
05/21/2024	GES Video call with Dan Stermer regarding various financial/operational analysis/issues and review/status of same.	0.50
	GES Prepare data files for Owners accounts receivable for Inventory report and review amend data reconciling items.	2.00
	GES Telephone conference call with Spencer Ferrero on accounts receivable date project.	0.30
	GES Prepare accounts receivable supporting schedules for inventory filing.	2.00
	GES Prepare updated accounts receivable data file for current balances.	0.50
05/22/2024	GES Evaluate assets on balance sheet for preparation of inventory report and confirm prior accounts receivable balances from prior accounting system were added to to the current ledger.	1.00
	GES Review e-mails cases to-date and prepare a details updated accounts payable schedule.	1.00
	GES Review of extensive data-dump from [REDACTED] and review of accounting record to ascertain potential construction related	

			HOURS
		liabilities.	2.00
	GES	Prepare inventory filing and related schedules and review and edit schedules.	2.50
	GES	Video call with Dan Stermer regarding financial aspects of matter and review/preparation of updated/revised financial information and exhibits for Receiver's Inventory and Initial Receiver's Report.	0.50
05/23/2024	GES	Review and refine inventory filing and related schedules.	2.00
05/24/2024	GES	Prepare cash detail 2024 year-to-date for review of cash receipts and disbursements.	2.00
05/28/2024	GES	Prepare banking data for January 2024 and February 2024 from bank statements into cash receipt and disbursement format that was unable to be downloaded from online banking and tie-out cash balance reporting for 2024 activity.	2.00
	GES	Review of accounts payable and update list of payments to issue and send to Ana Costales.	0.80
	GES	Video call with Dan Stermer regarding financial/insurance related issues/analysis/status and potential next steps regarding same.	0.50
	GES	Review cash balances and prepare schedule of monthly 2024 activity.	2.00
	GES	Review the 2024 budget and reporting on financials for 2024 activity.	1.50
05/29/2024	GES	Prepare an updated account statements for [REDACTED] units.	2.00
	GES	Review and pull together year-to-date cash detail from the accounting system.	2.00
	GES	Prepare accounting request to Ana Costales.	0.40
	GES	Video call with Dan Stermer regarding financial aspects of matter and [REDACTED] [REDACTED]-related issues and analysis of the owners ledger.	0.30
06/03/2024	GES	Review of May 2024 general ledger activity and confirm posting of May receipts and billings for June assessments.	0.50
	GES	Coordinating obtaining May 2024 bank statements and forward to Ana Costales.	0.50
06/04/2024	GES	Update cash reporting through May 31, 2024 and prepare file for Ana Costales.	1.00
	GES	Video call with Dan Stermer regarding financial status and related issues.	0.20
06/05/2024	GES	Evaluate cash receipts year-to-date and review cash deposits versus profit and loss activity.	1.50
	GES	Prepare profit and loss template for the rest	

			HOURS	
		of 2024 and update remaining budget for 2024.	2.00	
	GES	Video call with Dan Stermer, Brian Rich and Michael Niles regarding matter status and the next steps regarding insurance, financial issues, engineering issues, and setting meeting related issues.	0.80	
06/06/2024	GES	Video call with Dan Stermer regarding insurance and accounting related issues and status of same and next steps.	0.40	
	GES	Prepare recast cash based financial statements - year to date 2024.	4.00	
	GES	Prepare accounts receivable rollforward analysis to share at owners meeting.	2.50	
	GES	Evaluate financials and review and clean-up analysis.	2.00	
	JO	Prepare updates to monthly cash activity report.	0.70	n/c
06/07/2024	GES	Prepare data for accounts receivable update with details on outstanding balance detail and collections.	3.00	
	GES	Video call with Brian Rich and Michael Niles and Dan Stermer regarding financial and construction related issues and assessments.	0.50	
	GES	Video call with Yale Bogen to review the profit and loss.	0.40	
	YSB	Video call with George Shoup to review the P&L.	0.40	n/c
06/10/2024	GES	Update accounts receivable analysis for status of owners paying through May 2024.	2.00	
	GES	Update accounts receivable analysis for recent payment of ██████████ balance from December 2023 through June 2024.	0.80	
	GES	Review accounting treatment for ██████████ payment and provide instructions to Ana Costales.	0.40	
06/11/2024	GES	Prepare pro forma cash forecast for the next 3 months.	2.00	
	GES	Review and refine financial handouts for owners meeting.	1.50	
	GES	Review special assessment budget regarding payment for ACG Engineering.	0.40	
06/14/2024	GES	Review cash variance on reporting due to prepaid owners assessment account and reconcile cash activity and prepare year-to-date 2024 schedule; incorporate edits into cash based monthly financial template.	2.00	
06/17/2024	GES	Review of updated accounting ledger for updates to reporting from bookkeeper and review of cash activity.	0.50	
06/18/2024	GES	Review and process accounts payable and		

			HOURS		
		correspond with Ana Costales on book keeping matters.	0.50		
06/19/2024	GES	Evaluate professional costs of BBS and Speciality Engineering and review of retention agreements and operational cash flow forecast.	0.60		
	GES	Prepare updated accounts receivable ledger report for financials for May receiver's report.	2.00		
	GES	Review of May 2024 financials prepared by Preferred Accounting Services and review accrual accounting items.	0.70		
	GES	Prepare supplemental schedules of financial information for May Receiver's report.	2.00		
06/20/2024	GES	Prepare instructions to Ana Costales on accounting for insurance premium financing loan and prepare amortization table on loan payments.	0.60		
	GES	Finalize financial reporting for inclusion into the May's Receiver's status report.	1.50		
		Business Analysis	83.60	43,890.00	
05/20/2024	GES	Review of status of owners accounts receivable accounts to prepare for call with Eisnger Law Firm.	0.50		
	GES	Video call with Alessandra Stivelman and Eisnger Law Firm team on collection account projects and status.	0.70		
05/21/2024	SGF	Telephone call with George Shoup regarding HOA ledger balance reconciliation.	0.30		
	SGF	Review and analyze HOA ledger balance through 4/30/24 in order to create balance by property address.	1.80		
	SGF	Review and analyze HOA ledger balance through 5/24/24 in order to create balance by property address.	1.40		
05/22/2024	GES	Prepare schedule of amounts owing from [REDACTED] with current data.	0.50		
05/30/2024	GES	Prepare accounts receivable statements for the owner with 11 units, Coral Lakes, and review account details.	1.50		
	GES	Review accounts receivable and cash receipt applications on Coral Lakes account regarding owner's dispute over pre-2023 balances.	1.50		
05/31/2024	GES	Review schedule of assessments from [REDACTED] and prepare variance analysis to amounts shown on Heron Pond's records and respond to [REDACTED] to resolve undisputed amounts,	1.30		
06/03/2024	GES	Telephone call from [REDACTED] bookkeeper on assessments.	0.30		

		HOURS	
	GES	Prepare details on \$16,000 in old accounts receivable due from [REDACTED].	0.50
	GES	Video call with Dan Stermer regarding [REDACTED] related issues/status and communications/teleconference with representative regarding same.	0.20
06/04/2024	GES	Review of ledgers from [REDACTED] on disputed prepare December-2022 balance and respond.	0.70
06/10/2024	GES	Video call with Dan Stermer regarding incoming [REDACTED] wire for monthly assessments for December 2023 through June 2024 and next steps regarding analysis/finances with same.	0.20
06/11/2024	GES	Review of historical e-mails on [REDACTED] past due balances.	0.60
06/24/2024	GES	Video call with Dan Stermer regarding matter status and collection of monthly and special assessments and issues related to same.	0.40
	GES	Review accounts receivable ledgers and supporting info from Coral Lakes on disputed accounts receivable balance.	1.00
06/26/2024	GES	Reconcile the Coral Lakes accounts (7 ledgers) and confirm the amounts owing and detail the variances in an email to the owner.	3.00
		A/R Review/Collection	16.40
			8,417.50
05/07/2024	GES	Video call with Dan Stermer, Michael Niles and Kevin Szmuc/Plaintiff's Counsel (partial) regarding pending litigation matters and continued call regarding pending litigation, operations, and matter assessment related issues.	1.00
		Claims Analysis/Objections	0.00
			n/c
			0.00
04/26/2024	GES	Video calls with Dan Stermer on case planning.	0.50
	GES	Video call with Dan Stermer, Pat O'Malley and counsel to discuss receivership order being entered and next steps.	0.50
04/29/2024	GES	Review of the Receivership Order and prepare receivership task outline.	1.50
	GES	Prepare document request list for property management company.	0.50
	GES	To Heron Pond property to tour exteriors of property and brief meeting with HOA staff (Jennifer and Gianinne) to discuss Receivership and current operations.	2.50
	GES	Telephone conference call with Tom Fiore of the property management company to discuss background of properties and current	

		HOURS	
	operations.	0.80	
	GES Refine document request for management company.	0.50	
	GES Telephone call from James Rhoades the former president of the HOA to discuss case background.	0.50	
	GES Telephone call from Lillian Nesper (former HOA Board Member) on status of receivership.	0.40	
	GES Prepare insurance request to broker, Ben Meyers.	0.40	
	GES Prepare turnover request to outside accountant, Ana Costales.	0.50	
	GES Refine task list prepared by counsel and provide comments.	0.70	
	GES Attention to setting up the Heron Pond e-mail account.	0.30	
	GES Prepare comments to letter from Receiver to home owners.	0.50	
	GES Attend HOA Construction Committee meeting, at the request of Ms. Nesper.	0.60	
04/30/2024	GES Video call with Dan Stermer and Brian Rich, Michael Niles, and Jeff Wertman, and Alessandra Stivelman and Alex Alonso regarding receivership status and next steps, retention related issues, property/association status and related issues, and meeting with BOD and City of Pembroke Pines.	1.30	
	GES Research Ana Costales' background and send another note requesting a call.	0.60	
	GES Video call with Dan Stermer and Brian Rich and Michael Niles and Alessandra Stivelman and Alex Alonso and BOD members to discuss matter and status and answer questions.	1.10	
	GES Attention to pending receivership administration matters.	1.00	n/c
05/01/2024	GES Prepare turnover letters to Popular and Truist Banks.	1.00	
	GES Telephone conference call with Ben Meyers on insurance matters.	0.40	
	GES Review of insurance matters and follow-up with former broker and wholesale insurance companies.	2.00	
	GES Multiple and extensive communications and discussions with Dan Stermer regarding information gathering, financial information, insurance related issues, banking related issues, and discussions with various property professionals and others.	2.10	
05/02/2024	GES Coordinate group access to thumb drive files provided by City of Pembroke Pines on Community Information, correspondence with Heron Pond, Notices from City and Engineering Reports.	0.80	
	GES Telephone call to insurance broker, Ben Meyers,		

			HOURS
		on status of insurance and request to place new coverage.	0.50
	GES	Telephone conference call with the Heron staff, Jennifer Bermudez on payroll and payables inquiry.	0.40
	GES	Telephone conference call with Mike Niles on insurance.	0.30
	GES	Telephone conference call with Dan Stermer on insurance and pending matters.	0.30
05/03/2024	GES	Teleconference with Dan Stermer regarding insurance status, draft motion, and financial status-related issues.	0.30
	GES	Review of notices from the Fire Department.	0.20
	GES	Telephone call from Debbie Richendollar of Truist Bank on transition of services and accounts to Receiver.	0.50
	GES	Prepare follow-up request and instructions to Ana Costales for access to bank accounts and information not yet provided to the Receiver.	0.50
	GES	Video call with Dan Stermer and Mike Niles on insurance and follow up with broker.	0.30
	GES	Review of insurance policies and obtain confirmation the general liability policies are in force.	0.70
	GES	Follow-up call with Dan Stermer and Mike Niles on insurance matters.	0.40
	GES	Multiple communications and discussions with Dan Stermer regarding insurance, banking, and other status related issues.	0.90
05/06/2024	GES	Video call with Dan Stermer regarding financial/insurance-related issues and status and next steps regarding same.	0.20
	GES	Follow-up on insurance requests with former and current brokers.	0.60
	GES	Follow up with Popular Bank on Receiver's request and response received.	0.30
	GES	Review materials from City of Pembroke Pines and prepare master log of unsafe units by street address requested by insurance broker.	0.80
	GES	Additional follow up on insurance policies.	0.50
05/07/2024	GES	Telephone conference call with Lillian Nesper on HOA matters and prepare notes from the call for Receiver and counsel.	0.40
	GES	Prepare list of prioritized action items and review of receivership order deliverable deadlines.	0.50
	GES	Review property subject to estoppel request from HOA and prepare note to Receivership team.	0.40
	GES	Follow-up with Ana Costales on pending items requested.	0.20
	GES	Video call with Dan Stermer regarding banking and various operational status/issues.	0.30
	GES	Attention to Receivership administrative items,	

		HOURS
	including access to historical information, current payables and service providers, banking matters and blast email to owners on insurance notice filed by the Receiver.	1.50
	GES Video call with Pat O'Malley on case status and direction.	0.10
05/08/2024	GES Prepare for the call with West Broward Property Management, Tom Fiore and review of exist property management agreement and services to be provided.	0.80
	GES Telephone conference call with Lilian Nesper on Heron Pond status.	0.20
	GES Video call with Dan Stermer and Tom Fiore/West Broward Management regarding property status and related issues.	1.10
	GES Video call with Dan Stermer and Michael Niles and [REDACTED], and [REDACTED] on behalf of [REDACTED] regarding introduction and matter status and related issues (partial attendance on call).	0.40
	GES Video call with Dan Stermer and Michael Niles as follow up to previous video call with [REDACTED] representatives and next steps regarding same.	0.20
	GES Attention to access to Heron Pond e-mail account and review recent correspondence in account.	0.70
	GES Review and respond to Ben Meyers on insurance; review of prior policies and questioned low amount of coverage in relation to the property values.	0.50
05/09/2024	GES Telephone conference with Dan Stermer regarding site visit with engineer and issues related to same.	0.20
05/10/2024	GES Telephone call from Jennifer Bermudez on pending Heron Pond matters.	0.30
	GES Review access to payroll processing systems and effectuate payroll for the week of 4/30/24 for the two Heron Pond employees.	0.80
	GES Attention to preservation of e-mail files of Heron Pond.	0.50
05/13/2024	GES Video call with Dan Stermer on update on pending matters.	0.30
	GES Video call with Dan Stermer regarding various operational-related issues and status.	0.20
05/14/2024	GES Video call with Dan Stermer regarding banking-related issues and status.	0.50
	GES Attention to receivership operational and financial matters.	1.50
05/15/2024	GES Video call with Dan Stermer as follow up to	

			HOURS
		discussions with Ana Costales regarding Association books and records and related issues.	0.10
	GES	Telephone call with Dan Stermer on pending matters.	0.40
05/17/2024	GES	Process payroll for HOA staff.	0.20
	GES	Correspondence with Dan Stermer on payment request for shoring bill for May.	0.20
05/20/2024	GES	Attention to day-to-day property management matters.	0.80
	GES	Correspond via e-mail with Ben Meyers on insurance status.	0.20
	GES	Review of payables-related matters and process to pay current invoices.	0.60
	GES	Video call with Dan Stermer regarding financial status-related issues and processing of vendor payments and the next steps/status of same.	0.30
	GES	Telephone call from Heron Pond resident on status.	0.30
05/21/2024	GES	Prepare payables and wire transfer requests and call to vendors to confirm wire instructions.	0.50
05/22/2024	GES	Attention to day-to-day administrative functions of managing operations.	1.00
	GES	Review and comment on inventory filing report narrative.	0.40
05/23/2024	GES	Review narrative of the initial Receiver's report and provide additions relating to financial matters.	1.50
	GES	Telephone conference call with Mike Niles on report filings and pending matters.	0.10
05/24/2024	GES	Review of updated payables received from Jennifer Bermudez.	0.40
	GES	Telephone conference call with electrician regarding additional work needed to restore lighting.	0.30
05/28/2024	GES	Review of day-to-day administrative matters.	0.50
05/29/2024	GES	Follow-up with Ben Meyers on insurance placement.	0.10
05/30/2024	GES	Review of insurance quote summary from Ben Meyers and follow-up with questions on coverage.	0.30
05/31/2024	GES	Video call with Dan Stermer, Brian Rich, Michael Niles and Ben Meyers regarding insurance-related issues and potential coverages and continued call regarding insurance and related issues.	0.80

		HOURS
	GES Review insurance quotes for new policies and review prior policies and budgeted amounts to prepare for the call with the insurance broker, receiver and counsel.	0.80
06/04/2024	GES Attention to processing payables and wire transfers.	0.40
	GES Review of communications with owners and other day-to-day administrative e-mails regarding operations.	1.00
06/06/2024	GES Telephone conference call with ACG Engineering regarding the receivership.	0.10
	GES Telephone conference call with Ben Meyers on insurance.	0.30
	GES Video call with Dan Stermer regarding contact by ACG Engineering.	0.10
06/10/2024	GES Review banking information and confirm wire instructions for [REDACTED] [REDACTED].	0.20
06/11/2024	GES Review and process accounts payable check requests for Preferred Accounting.	0.80
	GES Video call with Dan Stermer regarding upcoming receivership meeting and preparation of information for same and processing of certain payables and issues related to same.	0.50
	GES Review vendor history with ACG Engineering and review of corporate e-mail regarding same.	1.00
06/12/2024	GES Prepare comments to owners meeting script for receiver and provide updated financial information.	1.50
06/13/2024	GES Review of daily e-mails on status of the case.	1.00
	GES Call with Dan Stermer on case update.	0.10
06/14/2024	GES Telephone conference call with Dan Stermer on site visit.	0.20
	GES Research Ocean Bank account and prepare letter to Bank advising of Receivership.	0.80
06/17/2024	GES Review polling information received to date and review unites held by multiple parties.	0.50
	GES Review of MARCH 2024 letter from owner to FBI on prior actions of Board.	0.30
	GES Review of updated insurance information and financing agreement.	0.30
	GES Video call with Dan Stermer regarding Accounts Payable processing and related issues.	0.10
06/18/2024	GES Review of insurance motion and confirm current cash on hand in preparation for court hearing seeking approval to enter into insurance agreements.	0.30
	GES Review insurance forms and financing agreement;	

			HOURS
		request edits to final form of agreement and coordinate payment of wire transfer for down payment of initial premium due.	0.80
06/21/2024	GES	Provide comments and edits to Receiver status report for the May 2024 period.	0.60
	GES	Research prior years' insurance policies and respond to insurance broker and prepare follow-up request for Receiver to send to [REDACTED].	1.00
	GES	Prepare turnover request for Receiver to send to Ocean Bank in response to prior request.	0.40
	GES	Telephone conference call with Dan Stermer on insurance and pending matters.	0.20
06/24/2024	GES	Correspondence to insurance brokers on inquiry from insurance carrier and review of prior engineering reports to see if requested information is available.	0.70
06/25/2024	GES	Review accumulated payables, review accounting system accounts payable and prepare request to Ana Costales to prepare checks.	1.00
		Managing Business Operations	63.30
			33,232.50
06/06/2024	GES	Telephone call with [REDACTED] and Dan Stermer regarding Association status, financial related issues including remittance of agreed monthly assessment amount, and insurance related issues and next steps.	0.50
06/10/2024	GES	Video call with Dan Stermer and Brian Rich and Michael Niles and [REDACTED], [REDACTED], and [REDACTED] regarding Association status, special assessments, and operational/construction related issues.	1.00
	GES	Follow-up video call with Dan Stermer and Brian Rich and Michael Niles regarding previous video call with [REDACTED] and Counsel.	0.10
06/12/2024	GES	Video call with Dan Stermer and Michael Niles and Alessandra Stivelman, Alex Alonso, and Joshua Cole regarding upcoming owners meeting and preparation for same and follow-up video call with Dan Stermer regarding same.	0.60
06/13/2024	GES	Review financial information and prepare for owners call with the receivership team.	1.00
	GES	Participate in zoom meeting with the receivership team and owners on status of matter.	1.10
	GES	Post-call follow-up with receiver and counsel after the owners call.	0.20
06/14/2024	GES	Video calls with Dan Stermer on owner communication.	0.40

		HOURS	
	GES Evaluate and comment on owner communication drafts.	0.60	
06/26/2024	GES Video call with Dan Stermer regarding [REDACTED] related issues.	0.20	
	Shareholdr Contact/Rltd Issues	5.70	2,992.50
05/02/2024	GES Attend meeting at Pembroke Pines City Hall with Dan Stermer and Paul Figg/Michael Niles (Teams), Alex Alonso and Alessandra Stivelman, and City Representatives regarding property and status and issues related to same.	3.50	
	Government Contact	3.50	1,837.50
	FOR THE FOREGOING PROFESSIONAL SERVICES RENDERED:	174.10	91,210.00

RECAPITULATION

<u>CONSULTANT</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
G. E. Shoup	170.60	\$525.00	\$89,565.00
S. G. Ferrero	3.50	470.00	1,645.00

Photocopy Charges	2.55
Postage	1.28
Lodging	1,376.36
Meals	3.80
Airfare	887.96
Car Rental	222.39
Transportation	213.34
Other miscellaneous charges	174.20
TOTAL DISBURSEMENTS: THRU 06/30/2024	2,881.88
TOTAL CURRENT WORK	94,091.88
BALANCE DUE	<u>\$94,091.88</u>



201 E. LAS OLAS BLVD. SUITE 1500
 FORT LAUDERDALE, FLORIDA 33301
 T: (954) 525-9900 F: (954) 523-2872
WWW.BERGERSINGERMAN.COM
 EIN# 45-3121429

STERMER, DANIEL
 500 EAST BROWARD BOULEVARD, SUITE 1700
 FORT LAUDERDALE, FL 33394

June 7, 2024
Invoice: 280435

Client: 34085-0001

Re: ***REPRESENT DAN STERMER AS RECEIVER ON CASE
 FILED IN THE SEVENTH JUDICIAL CIRCUIT COURT IN
 AND FOR BROWARD COUNTY, FL***

For professional services rendered thru: ***May 31, 2024***

Total Fees	66,302.50
Total Expenses	179.79
Total Balance Due	\$66,482.29

As always, it is our pleasure to work with you! Payment is due upon receipt.
 Payments Options:

You may remit payment via check or visit www.bergersingerman.com/info/client-tools/ to pay with credit card.
 If you wish to remit payment via wire transfer, please refer to the instructions below.

Thank you!

Wiring instructions for Berger Singerman:

Bank:	City National Bank of Florida
Bank Address:	25 W Flagler Street Miami, FL 33130
ABA No.:	██████████
Account Name:	Berger Singerman, LLP Merchant Account
Account No.:	██████████
Reference Number:	34085-0001



STERMER , DANIEL
500 EAST BROWARD BOULEVARD, SUITE 1700
FORT LAUDERDALE, FL 33394

INVOICE DATE: June 7, 2024
INVOICE NO. 280435

REPRESENT DAN STERMER AS RECEIVER ON CASE FILED
IN THE SEVENTH JUDICIAL CIRCUIT COURT IN AND FOR
BROWARD COUNTY, FL

MATTER ID: 34085-0001

PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: May 31, 2024

F E E S

Date	Attorney	Description	Hours
04/26/24	JSW	PREPARE FOR AND PARTICIPATE IN STRATEGIC PLANNING CONFERENCE WITH RECEIVER TEAM AND OTHERS; REVIEW CRITICAL POST-CONFERENCE EMAIL COMMUNICATIONS	0.70
04/26/24	JSW	REVIEW ORDER APPOINTING RECEIVER	0.50
04/26/24	BGR	TEAM CALLS AND PREP WORK AFTER ENTRY OF ORDER	1.80
04/27/24	BGR	CALLS WITH CLIENT ON CITY MEETING AND PREP FOR STRATEGY ISSUES	1.50
04/27/24	MJN	PREPARE INITIAL TASK LIST.	0.80
04/28/24	BGR	REVIEW CASE PLEADINGS/TASK LIST UPDATES	1.30
04/28/24	MJN	PREPARE FIRST DAY PAPERS: APPLICATIONS TO EMPLOY, OATH OF RECEIVER, INVENTORY, AND INITIAL DEMAND/TURNOVER CORRESPONDENCE.	2.40
04/29/24	JD	REVIEW AND REVISE (I) MOTION TO EMPLOY BERGER SINGERMAN AS COUNSEL TO THE RECEIVER (.20); (II) MOTION TO EMPLOY EISINGER LAW AS SPECIAL COUNSEL TO THE RECEIVER (.20); AND (III) MOTION TO EMPLOY DEVELOPMENT SPECIALISTS, INC. AS FINANCIAL ADVISOR AND CONSULTANT TO THE RECEIVER (.20); AND DRAFT (I) AGREED ORDER GRANTING RECEIVER'S MOTION TO EMPLOY BERGER SINGERMAN AS COUNSEL TO THE RECEIVER (.20); (II) AGREED ORDER GRANTING RECEIVER'S MOTION TO EMPLOY EISINGER LAW AS SPECIAL COUNSEL (.20);	1.20

F E E S

Date	Attorney	Description	Hours	
		AND (III) AGREED ORDER GRANTING RECEIVER'S MOTION TO EMPLOY DEVELOPMENT SPECIALISTS AS FINANCIAL ADVISOR AND CONSULTANT (.20)		
04/29/24	BGR	REVIEW AND UPDATE PLEADINGS AND PREP FOR UPCOMING MEETINGS WITH CITY	0.90	
04/29/24	MJN	WORK ON INITIAL PLEADINGS AND CORRESPONDENCE; PREPARE INITIAL CORRESPONDENCE TO UNIT OWNERS.	1.50	
04/30/24	JSW	PREPARE FOR AND PARTICIPATE IN TEAM STATUS AND STRATEGY CALL	0.80	
04/30/24	BGR	PREP FOR AND ATTEND CALL WITH BOARD	0.00	N/C
04/30/24	BGR	PREP FOR AND ATTEND CALL WITH CLIENT AND ESINGER;	1.20	
04/30/24	BGR	REVIEW AND UPDATE PLEADINGS TO BE FILED.	0.90	
04/30/24	LT	REVIEW OF COURT DOCKET SHEET AND COORDINATE DOWNLOADING OF ALL FILINGS FOR FILESITE (.30); CAREFUL REVIEW OF ORDER APPOINTING RECEIVER TO CONFIRM DEADLINES (.40); DRAFT NOTICES OF APPEARANCES FOR ALL COUNSEL OF RECORD AND PREPARE SAME FOR E-FILING (.80); REVIEW OF RECEIVER'S BOND, DRAFT NOTICE OF FILING RECEIVER'S BOND AND PREPARE SAME FOR E-FILING (.70); REVIEW OF RECEIVER'S OATH, DRAFT NOTICE OF FILING AND PREPARE SAME FOR E-FILING (.60); REVIEW OF INTRODUCTORY LETTER SERVED ON UNIT OWNERS (.10); REVIEW AND REDACT RESIDENTIAL REPORT FOR E-FILING (.70); DRAFT NOTICE OF FILING INTRODUCTORY LETTER TO UNIT OWNERS AND PREPARE SAME FOR E-FILING (.50); COMMUNICATIONS WITH D. STERMER REGARDING CASE ISSUES/FILINGS (.20).	2.80	
04/30/24	MJN	INITIAL CALL TO DISCUSS STRATEGY AND PENDING ITEMS (1.2); REVISE EMPLOYMENT DOCUMENTS (.4); CORRESPOND WITH TEAM REGARDING THE SAME (.4); FINALIZE DOCUMENTS FOR FILING (.5)	1.20	
04/30/24	MJN	ZOOM CALL WITH ASSOCIATION BOARD	1.00	
05/01/24	BGR	PREP FOR AND ATTEND CALL WITH KEITH GRUMER	0.80	
05/01/24	BGR	FOLLOW-UP ON PLEADINGS TO BE FILED AND TASK LIST ISSUES	0.90	
05/01/24	MJN	CORRESPOND WITH COUNSEL FOR [REDACTED]; FOLLOW UP CALL REGARDING THE SAME.	0.50	
05/01/24	MJN	RESEARCH REGARDING [REDACTED] UNITS.	1.20	

F E E S

Date	Attorney	Description	Hours	
05/01/24	MJN	CORRESPOND WITH D.STERMER REGARDING UNIT OWNERS. [.2 NO CHARGE]	0.00	N/C
05/01/24	MJN	REVIEW BUDGET, INCOME STATEMENT AND FINANCIAL STATEMENTS; PROVIDE REVIEW OF SAME.	1.00	
05/02/24	JD	RESEARCH PROCEDURES FOR EMERGENCY RELIEF; DRAFT REQUEST FOR EMERGENCY RELIEF	0.50	
05/02/24	PSF	MEETING WITH THE CITY OF PEMBROKE PINES; FOLLOW UP	4.10	
05/02/24	MJN	ATTENDING MEETING WITH CITY OFFICIALS TO DISCUSS RECEIVERSHIP ORDER. [2.4 NO CHARGE]	0.00	N/C
05/02/24	MJN	RESEARCH REGARDING INSURANCE OBLIGATIONS AND REVIEW OF ASSOCIATION INSURANCE POLICIES; PREPARE EMERGENCY MOTION FOR INSTRUCTIONS; CORRESPOND WITH TEAM REGARDING THE SAME.	3.70	
05/02/24	MJN	CORRESPOND WITH COUNSEL D. BAKALAR REGARDING STATE COURT PROCEEDING. RESEARCH REGARDING THE SAME.	0.40	
05/02/24	MJN	CORRESPOND WITH ACG ENGINEERING TO ARRANGE FOR MEETING WITH RECEIVER ON 5/3	0.30	
05/03/24	JG	CONFER W. M. NILES RE LACK OF INSURANCE AND RELIEF BEFORE THE COURT (.3); REVIEW AND REVISE EMERGENCY MOTION AND PROPOSED ORDER AUTHORIZING RECEIVER TO VACATE THE PREMISES (1.0);	0.80	
05/03/24	JD	REVIEW, REVISE, FINALIZE, FORMAT AND FILE (I) RECEIVER, DANIEL J. STERMER'S MOTION FOR APPROVAL OF EMPLOYMENT OF DEVELOPMENT SPECIALISTS, INC. AS FINANCIAL ADVISOR AND CONSULTANT TO THE RECEIVER, EFFECTIVE AS OF APRIL 26, 2024 (.30); AND (II) RECEIVER, DANIEL J. STERMER'S MOTION FOR APPROVAL OF EMPLOYMENT OF BERGER SINGERMAN LLP AS COUNSEL TO THE RECEIVER, EFFECTIVE AS OF APRIL 26, 2024 (.30)	0.60	
05/03/24	BGR	ATTEND TO ISSUES RELATED TO INSURANCE AND POTENTIAL FOR SHUT DOWN	0.90	
05/03/24	BGR	ATTEND TO ISSUES RELATED TO INSURANCE	1.20	
05/03/24	LT	TRAVEL TO COURTHOUSE TO PROCESS ORIGINAL RECEIVER'S BOND.	1.00	
05/03/24	PSF	COMPILE REPORTS OF ACG ENGINEERING SERVICES, INC.; ONSITE WALKTHROUGH OF HERON POND COMPLEX AND BUILDINGS WITH ENGINEER	2.00	

F E E S

Date	Attorney	Description	Hours	
05/03/24	MJN	FINALIZE EMPLOYMENT APPLICATIONS.	0.40	
05/03/24	MJN	CORRESPOND WITH D. STERMER AND G. SHOUP REGARDING INSURANCE ISSUES; REVIEW LIABILITY POLICIES AND CONDUCT FURTHER RESEARCH REGARDING THE SAME.	1.50	
05/03/24	MJN	REVIEW AND REVISE MOTION FOR INSTRUCTIONS (INSURANCE ISSUE).	1.50	
05/03/24	MJN	PREPARE CORRESPONDENCE TO B. SOLOMON; PREPARE DOCUMENT TURNOVER AND PRESERVATION LETTER.	0.30	
05/04/24	MJN	WORK ON NOTICE REGARDING STATUS OF INSURANCE ISSUES.	0.60	
05/05/24	MJH	EMAILS WITH RECEIVER; REVIEW AND ANALYZE INSURANCE ISSUES.	2.00	
05/05/24	MJN	WORK ON NOTICE REGARDING INSURANCE POLICIES; PREPARE NOTICE OF RECEIVERSHIP AND MOTION TO TRANSFER	1.50	
05/06/24	LT	RESEARCH COURT DOCKET SHEETS AND WESTLAW TO IDENTIFY ALL CASES INVOLVING HERON POND CONDOMINIUM AND DRAFT NOTICE/MOTION TO TRANSFER IN ALL IDENTIFIED CASES (3.2); PREPARE AND FILE ALL NOTICES/MOTIONS TO TRANSFER (1.5); REVISIONS TO MOTION TO EMPLOY EISINGER LAW AND PREPARE SAME FOR E-FILING (1.0); REVISIONS TO NOTICE OF FILING STATUS INSURANCE POLICIES AND PREPARE SAME FOR E-FILING (.50).	4.50	
05/06/24	MJH	MULTIPLE EMAILS WITH RECEIVER; ANALYSIS OF INSURANCE ISSUES. [.3 NO CHARGE]	0.00	N/C
05/06/24	MJN	CONFERENCE CALL WITH J. PARDO TO DISCUSS LITIGATION. REVIEW DOCUMENTS IN SHAREFILE. [1.2 NO CHARGE]	0.00	N/C
05/06/24	MJN	CONFERENCE CALL WITH SOLOMON REGARDING PRIOR REPRESENTATION.	0.30	
05/06/24	MJN	PREPARE NOTICE AND MOTION TO TRANSFER TO RECEIVERSHIP COURT; FOLLOW UP WITH TEAM REGARDING THE SAME/	0.80	
05/06/24	MJN	FINALIZE NOTICE OF STATUS OF INSURANCE POLICIES.	0.30	
05/07/24	BGR	ATTEND TO ISSUES RELATED TO ASSESMENTS AND CITY MEETING	0.90	
05/07/24	LT	TRAVEL BACK TO COURTHOUSE TO PROCESS BOND WITH REGISTRY CLERK OF THE COURT (1.2);	1.00	

F E E S

Date	Attorney	Description	Hours	
		ADDRESS ISSUES AND COORDINATE SETTING HEARING ON ALL APPLICATIONS (.30); REVIEW OF PROPOSED ORDER ON MOTION TO TRANSFER (.10).		
05/07/24	MJN	CORRESPOND WITH K. SZMUC REGARDING LITIGATION.	0.30	
05/07/24	MJN	REVIEW DOCUMENTS PROVIDED BY J.PARDO.	0.80	
05/07/24	MJN	RESEARCH REGARDING OUTSTANDING PERMITS.	0.40	
05/08/24	MJN	PREPARE AGREED ORDER GRANTING MOTION TO TRANSFER; CORRESPOND WITH OPPOSING COUNSEL REGARDING THE SAME.	0.50	
05/08/24	MJN	CORRESPOND WITH D.BAKALAR REGARDING [REDACTED].	0.30	
05/08/24	MJN	WORK ON UPDATED TASK LIST; CORRESPOND WITH TEAM REGARDING THE SAME. [.4 NO CHARGE]	0.00	N/C
05/08/24	MJN	CORRESPOND WITH COUNSEL FOR [REDACTED]; RESEARCH REGARDING THE SAME.	1.00	
05/09/24	LT	FOLLOW-UP AND ADDRESS ISSUES WITH COURT REPORTER (.10); FOLLOW-UP ON SUBMITTAL OF TRANSFER ORDERS (.10). [.2 NO CHARGE]	0.00	N/C
05/09/24	PSF	MEETING WITH RECEIVER AND ENGINEER MARK LEBLANC AT HERON POND TO DISCUSS KREH'S CONCLUSIONS REGARDING OCCUPIED BUILDINGS	2.70	
05/09/24	MJN	CORRESPOND WITH OPPOSING COUNSEL REGARDING MOTION TO TRANSFER.	0.30	
05/10/24	LT	WORK ON AND COORDINATE UPLOADING OF PROPOSED ORDERS IN ALL RECEIVERSHIP PENDING CASES.	0.50	
05/10/24	MJN	REVIEW DOCUMENTS/INVOICES PROVIDED BY OPPOSING COUNSEL	0.70	
05/10/24	MJN	REVIEW AGREED ORDERS AND CORRESPOND WITH TEAM REGARDING THE SAME; FOLLOW UP WITH OPPOSING COUNSEL REGARDING THE SAME.	0.50	
05/11/24	MJN	CORRESPOND WITH D. STERMER REGARDING PROPERTY ISSUES AND STRATEGY.	1.00	
05/13/24	BGR	ATTEND TO STRATGEY ISSUES; STATUS CASE UPDATES AND WORK ON TASK LIST	1.60	
05/13/24	MJN	CORRESPOND WITH J.WERTMAN REGARDING MOTIONS SET FOR HEARING. [.4 NO CHARGE]	0.00	N/C
05/13/24	MJN	CORRESPOND WITH G. SHOUP REGARDING OUTSTANDING ASSESSMENTS; REVIEW DOCUMENTS	0.50	

F E E S

Date	Attorney	Description	Hours
		PROVIDED.	
05/13/24	MJN	REVIEW COST CONSTRUCTION INVOICES.	0.50
05/13/24	MJN	REVIEW CORRESPONDENCE BETWEEN RECEIVER AND K. GRUMER; FOLLOW UP REGARDING THE SAME.	0.30
05/14/24	BGR	ATTEND TO HEARING PREP AND FOLLOW-UP ON EMPLOYMENT PAPERS AND TRANSFER HEARINGS	0.80
05/14/24	MJN	REVIEW AND REVISE DISCLOSURES FOR PROSPECTIVE TENANTS AND PURCHASERS; REVIEW OCCUPANCY INFORMATION SHEET; CORRESPOND WITH D. STERMER REGARDING SAME.	0.40
05/14/24	MJN	REVIEW RESPONSE TO DBPR COMPAINIT; FOLLOW UP WITH D. STERMER.	0.30
05/14/24	MJN	REVIEW ESTOPPEL REQUEST AND FORM ESTOPPEL. FOLLOW UP WITH A. ALONSO REGARDING SAME.	0.60
05/14/24	MJN	CORRESPOND WITH G. HURTADO REGARDING DISCLOSURES.	0.20
05/14/24	MJN	PREPARE FOR HEARINGS ON EMPLOYMENT APPLICATIONS AND INSURANCE NOTICE.	0.40
05/14/24	MJN	CORRESPOND WITH PRIOR COUNSEL REGARDING CONCERNS WITH ESTOPPEL CERTIFICATE.	0.40
05/15/24	BGR	ATTEND TO ISSUES RELATED TO PROPERTY DAMAGE.INSPECTIONS	0.70
05/15/24	BGR	ANALYSIS OF DAMAGE REPORTS AND ISSUES ON CONTRACTOR PAYING EMPLOYEES	0.70
05/15/24	CC	PREPARE MOTION TO EMPLOY SPECIALTY ENGINEERING CONSULTING, INC. AND CORRESPONDING PROPOSED FORM OF ORDER.	1.00
05/15/24	MJN	ATTEND CASE MANAGEMENT CONFERENCE; CORRESPOND WITH OPPOSING COUNSEL; UPLOAD ORDER.	0.60
05/15/24	MJN	REVIEW AND REVISE EMPLOYMENT APPLICATION FOR SEC, INC.	0.30
05/15/24	MJN	FOLLOW UP WITH ASSOCIATION'S PRIOR COUNSEL REGARDING ESTOPPEL.	0.30
05/15/24	MJN	REVIEW CORRESPONDENCE REGARDING COST CONSTRUCTION GROUP; RESEARCH REGARDING THE SAME.	0.50
05/15/24	MJN	REVIEW ANCILLARY CASES THAT NEED TO BE TRANSFERRED TO JUDGE TUTER; CORREPSOND WITH COUNSEL REGARDING THE SAME.	0.30

F E E S

Date	Attorney	Description	Hours	
05/16/24	JSW	REVIEW PENDING MOTIONS AND COMMUNICATIONS TO AND FROM RECEIVER	0.60	
05/16/24	BGR	PREP FOR UPCOMING HEARINGS	0.80	
05/16/24	LT	ADDRESS ISSUES WITH UPCOMING HEARINGS (.10); REVIEW OF TASK LIST CIRCULATED BY D. STERMER (.20).	0.30	
05/16/24	MJN	REVIEW ENGAGEMENT OF B.B.S. BUILDINGS, INC.	0.30	
05/16/24	MJN	CORRESPOND WITH OPPOSING COUNSEL REGARDING CASE MANAGEMENT HEARING; REVIEW PROPOSED ORDER.	0.30	
05/17/24	BGR	FOLLOW-UP ON NEXT STEPS AND HEARING PREP	0.80	
05/17/24	BGR	FOLLOW-UP ON ASSESSMENT COLLECTION ISSUES	0.90	
05/17/24	CC	FINALIZE AND E-FILE MOTION TO APPROVE EMPLOYMENT OF SPECIALTY ENGINEERING CONSULTANTS. [.3 NO CHARGE]	0.00	N/C
05/17/24	MJN	CORRESPOND WITH J.WERTMAN REGARDING ORDER TRANSFERRING CASES; REVIEW DOCKETS REGARDING THE SAME.	0.30	
05/17/24	MJN	WORK ON RECEIVER'S INITIAL REPORT AND INVENTORY LIST	2.60	
05/17/24	MJN	REVIEW ADDITIONAL DOCUMENTS REGARDING LAWSUITS AND COVERAGE REQUESTS.	0.40	
05/17/24	MJN	CORRESPOND WITH C.CRUZ REGARDING EMPLOYMENT PAPERS [.3 NO CHARGE]	0.00	N/C
05/18/24	MJN	CORRESPOND WITH G. SHOUP REGARDING INSURANCE ISSUES.	0.30	
05/20/24	JSW	PREPARE FOR AND PARTICIPATE IN HEARING ON RECEIVER'S MOTIONS TO EMPLOY VARIOUS PROFESSIONALS; POST-HEARING CONFERENCE CALL WITH RECEIVER; REVIEW PROPOSED ORDERS [1.1 NO CHARGE]	0.00	N/C
05/20/24	BGR	FOLLOW-UP FROM HEARING AND WORK ON RESPONSE TO INQUIRIES	0.90	
05/20/24	BGR	FURTHER FOLLOW-UP ON FORM OF ORDER; REVIEW STATUS REPORT AND INVENTORY DRAFTS	0.80	
05/20/24	CC	PREPARE MOTION TO EMPLOY B.B.S. BUILDERS, INC. AS GENERAL BUILDING CONTRACTORS TO THE RECEIVER AND PROPOSED FORM OF ORDER.	0.80	
05/20/24	MJN	PREPARE FOR HEARING ON EMPLOYMENT APPLICATIONS AND NOTICE OF INSURANCE; FOLLOW	0.70	

F E E S

Date	Attorney	Description	Hours	
		UP WITH D. STERMER TO DISCUSS HEARING AND NEXT STEPS.		
05/20/24	MJN	REVISE ORDERS ON MOTION TO EMPLOY PURSUANT TO JUDGE'S RULING; PREPARE ORDER DIRECTING STATUS CONFERENCE.	0.60	
05/21/24	BGR	EDIT INITIAL REPORT	0.70	
05/21/24	MJN	REVIEW AND REVISE INITIAL INVENTORY REPORT AND RECEIVER'S INITIAL REPORT.	1.00	
05/22/24	BGR	WORK ON REPORTS TO BE FILED. [.9 NO CHARGE]	0.00	N/C
05/22/24	LT	ATTEND TO RECEIVER'S INVENTORY REPORT AND OTHER MISC FILINGS.	0.40	
05/22/24	MJN	REVIEW INITIAL INVENTORY REPORT; CORRESPOND WITH G. SHOUP; REVISE REPORT.	0.50	
05/22/24	MJN	PREPARE AND FINALIZE NOTICE OF FILING PHOTOS. REVIEW STRUCTURAL ASSESSMENT REPORTS.	0.50	
05/22/24	MJN	REVIEW AND REVISE INITIAL REPORT.	0.40	
05/23/24	JD	REVIEW, REVISE, FINALIZE, FORMAT AND FILE (I) RECEIVER'S INITIAL REPORT; AND (II) RECEIVER'S INITIAL INVENTORY REPORT	0.30	
05/23/24	JSW	REVIEW PENDING MOTIONS AND ORDERS	0.70	
05/23/24	JSW	REVIEW COURT DOCKET RE UPCOMING HEARINGS AND DEADLINES [.4 NO CHARGE]	0.00	N/C
05/23/24	BGR	REVIEW OF INITIAL REPORT AND INVENTORY FOR FILING	0.90	
05/23/24	MJN	FINALIZE INITIAL REPORT AND INITIAL INVENTORY REPORT; CORRESPOND WITH G. SHOUP REGARDING THE SAME.	1.50	
05/26/24	BGR	FOLLOW-UP ON ENGINEER REPORT AND STATUS	0.80	
05/28/24	BGR	CALL ON STATUS OF INSURANCE	0.60	
05/28/24	MJN	REVIEW PERMIT APPLICATION STATUS AND CORRESPONDENCE BETWEEN D.STERMER AND ██████████ REGARDING PERMITS AND ONGOING CONSTRUCTION.	0.40	
05/29/24	BGR	CALL WITH CLIENT AND FOLLOW-UP ON ASSESSMENT PAYMENTS	0.90	
05/29/24	MJN	ATTEND HEARING ON MOTION TO TRANSFER (YUGA CORP); REVIEW PROPOSED ORDER.	0.40	
05/29/24	MJN	CORRESPOND WITH ██████████ AND COUNSEL; RESEARCH REGARDING THE SAME.	0.70	

F E E S

Date	Attorney	Description	Hours	
05/29/24	MJN	CORRESPOND WITH G. SHOUP REGARDING INSURANCE.	0.20	
05/30/24	BGR	FOLLOW-UP HEARING AND INSURANCE ISSUES	0.90	
05/30/24	MJN	CORRESPOND WITH K. SZMUC REGARDING INSURANCE DEMAND.	0.30	
05/30/24	MJN	REVIEW PHOTOS AND PLANS FROM PEMBROKE PINES BUILDING DEPARTMENT.	0.50	
05/30/24	MJN	PREPARE CORRESPONDENCE TO COUNSEL REGARDING CONSTRUCTION AND SHORING ISSUES.	0.30	
05/30/24	MJN	ATTEND HEARING REGARDING MOTION TO TRANSFER; REVIEW AND REVISE ORDER; CORRESPOND WITH COUNSEL FOR PLAINTIFF REGARDING THE SAME.	2.00	
05/30/24	MJN	REVIEW AND REVISE MOTION TO EMPLOY BBS; REVIEW CORRESPONDENCE REGARDING THE SAME.	0.40	
05/31/24	JD	REVIEW, REVISE, FINALIZE AND FILE RECEIVER'S MOTION FOR APPROVAL OF EMPLOYMENT OF B.B.S. BUILDERS, INC. AS GENERAL BUILDING CONTRACTORS TO THE RECEIVER [.3 NO CHARGE]	0.00	N/C
05/31/24	BGR	PREP FOR AND ATTEND CALL ON INSURANCE	0.60	
05/31/24	MJN	REVIEW APPLICATION TO EMPLOY BBS.; CORRESPOND WITH J. DIAZ REGARDING THE SAME.	0.30	
05/31/24	MJN	CORRESPOND WITH D. STERMER; G. SHOUP, B.RICH REGARDING INSURANCE AND CONSTRUCTION ISSUES; REVIEW INSURANCE QUOTES.	1.30	
05/31/24	MJN	REVISE LETTER TO [REDACTED] AND COST CONSTRUCTION; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.30	
05/31/24	MJN	REVIEW FILES, DOCUMENTS, AND CORRESPONDENCE REGARDING FEDERATED FOUNDATION AND PAYMENT OF ASSESSMENTS.	0.40	
Total Hours:			105.00	
Total Fees:			66,302.50	

F E E S U M M A R Y

Attorney	Hours	Rate	Total
Carmen Cruz	1.80	325.00	585.00
Janette Diaz	2.60	325.00	845.00

FEE SUMMARY

Attorney	Hours	Rate	Total
Paul Figg	8.80	700.00	6,160.00
Jordi Guso	0.80	825.00	660.00
MICHAEL J. HIGER	2.00	770.00	1,540.00
Michael J. Niles	49.50	635.00	31,432.50
Brian G. Rich	25.70	750.00	19,275.00
Luis Torres	10.50	325.00	3,412.50
Jeffrey Wertman	3.30	725.00	2,392.50
Total	105.00		\$66,302.50

EXPENSES

Date	Description	Amount
05/21/24	VENDOR: VERITEXT; INVOICE#: 7431392; DATE: 5/21/2024 - 34085.0001 WITNESS: JUDGE B. TUTER, MINIMUM CHARGE FOR SERVICES RENDERED	145.00
	REPRODUCTION	7.50
	WESTLAW CHARGES	27.29
	Total Expenses	\$179.79

CURRENT BALANCE DUE **\$66,482.29**

 **BERGER SINGERMAN**

201 E. LAS OLAS BLVD. SUITE 1500
FORT LAUDERDALE, FLORIDA 33301
T: (954) 525-9900 F: (954) 523-2872
WWW.BERGERSINGERMAN.COM
EIN# 45-3121429

STERMER, DANIEL
500 EAST BROWARD BOULEVARD, SUITE 1700
FORT LAUDERDALE, FL 33394

July 3, 2024
Invoice: 281478

Client: 34085-0001

Re: ***REPRESENT DAN STERMER AS RECEIVER ON CASE
FILED IN THE SEVENTH JUDICIAL CIRCUIT COURT IN
AND FOR BROWARD COUNTY, FL***

For professional services rendered thru: ***June 30, 2024***

Total Fees	61,324.50
Total Expenses	0.00
Current Balance Due	61,324.50
<i>Past Due Balance</i>	66,482.29
Total Balance Due	\$127,806.79

As always, it is our pleasure to work with you! Payment is due upon receipt.

Payments Options:

You may remit payment via check or visit www.bergersingerman.com/info/client-tools/ to pay by eCheck or credit card.

If you wish to remit payment via wire transfer, please refer to the instructions below.

Thank you!

Wiring instructions for Berger Singerman:

Bank:	City National Bank of Florida
Bank Address:	25 W Flagler Street Miami, FL 33130
ABA No.:	██████████
Account Name:	Berger Singerman, LLP Merchant Account
Account No.:	██████████
Reference Number:	34085-0001



STERMER , DANIEL
500 EAST BROWARD BOULEVARD, SUITE 1700
FORT LAUDERDALE, FL 33394

INVOICE DATE: July 3, 2024
INVOICE NO. 281478

REPRESENT DAN STERMER AS RECEIVER ON CASE FILED
IN THE SEVENTH JUDICIAL CIRCUIT COURT IN AND FOR
BROWARD COUNTY, FL

MATTER ID: 34085-0001

PROFESSIONAL LEGAL SERVICES RENDERED THROUGH: June 30, 2024

F E E S

Date	Attorney	Description	Hours	
06/03/24	JSW	REVIEW STATUS OF OTHER LITIGATION (NOT IN MAIN CASE) [.6 NO CHARGE]	0.00	N/C
06/03/24	BGR	FOLLOW-UP ON PAYMENT OF ASSESMENT AND INSPECTION WORK	0.60	
06/03/24	MJN	CORRESPOND WITH K SZMUC REGARDING PROPOSED ORDER.	0.20	
06/04/24	BGR	WORK ON REPORTS TO BE FILED WITH COURT	0.30	
06/04/24	MJN	ATTEND HEARING IN COIFMAN V. HERON POND.	0.70	
06/04/24	MJN	REVIEW AND REVISE DISCLOSURE OF PROSPECTIVE TENANT; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.50	
06/04/24	MJN	PREPARE INITIAL STATEMENT OF ACCOUNT/APPLICATION FOR PAYMENT.	2.60	
06/04/24	MJN	FURTHER REVISE APPLICATION FOR FEES AND COSTS.	0.30	
06/05/24	BGR	PREP FOR AND ATTEND STRATGEY CALL [1.2 NO CHARGE]	0.00	N/C
06/05/24	BGR	WORK ON REPORT ISSUES	0.90	
06/05/24	MJN	REVIEW AND REVISE STATEMENT OF ACCOUNT; CORRESPOND WITH D. STERMER AND B.RICH REGARDING THE SAME.	0.70	
06/05/24	MJN	CORRESPOND WITH A. STIVELMAN REGARDING STATEMENT OF ACCOUNT.	0.20	

F E E S

Date	Attorney	Description	Hours	
06/05/24	MJN	CONFERENCE CALL WITH D. STERMER AND TEAM REGARDING MEETING NOTICE AND STATEMENT OF ACCOUNT; PREPARE NOTICE OF AGENDA;	1.30	
06/05/24	MJN	UPDATE DISCLOSURE TO PROSPECTIVE TENANTS REGARDING RECEIVERSHIP/LIFE SAFETY ISSUES.	0.50	
06/05/24	MJN	FURTHER REVISIONS TO STATEMENT OF ACCOUNT [.6 NO CHARGE]	0.00	N/C
06/06/24	JSW	REVIEW CONSTRUCTION ISSUES RELATING TO PROPERTY	0.50	
06/06/24	BGR	ANALYSIS OF CONSTRUCTION RELATED ISSUES AND OVERALL CASE STRATEGY RELATED TO SAME.	1.40	
06/06/24	MJN	PREPARE MOTION TO ENTER INTO INSURANCE POLICIES	2.00	
06/06/24	MJN	REVIEW ██████████ CONTRACT; REVIEW PRIOR MEMOS REGARDING THE SAME.	0.60	
06/06/24	MJN	REVIEW, REVISE AND RESPOND TO CORRESPONDENCE REGARDING ██████████.	0.50	
06/07/24	JSW	PARTICIPATE IN STRATEGY DISCUSSION RE ██████████ AND RELATED ISSUES	0.50	
06/07/24	BGR	CALL WITH SPECIALTY ENGINEERING AND FOLLOW-UP ON ENGINEERING AND SCOPE OF WORK ISSUES	1.60	
06/07/24	BGR	CALL WITH ██████████ AND COUNSEL AND FOLLOW-UP ON SAME [.9 NO CHARGE]	0.00	N/C
06/07/24	BGR	WORK ON REPORT ISSUES AND RESPONSE TO CREDITORS	0.90	
06/07/24	MJN	REVIEW AND REVISE INITIAL STATEMENT OF ACCOUNT; INCORPORATE INFORMATION REGARDING THE SAME.	0.40	
06/07/24	MJN	CORRESPOND WITH B.MEYERS REGARDING INSURANCE; REVIEW DOCUMENTS PROVIDED.	0.70	
06/07/24	MJN	CONFERENCE CALL WITH ENGINEER REGARDING STATUS OF BUILDINGS;	0.70	
06/07/24	MJN	REVIEW DOCUMENT PROVIDED BY ██████████ AND DROPBOX DOCUMENTS REGARDING WORKED PERFORMED BY ██████████.	0.80	
06/07/24	MJN	CONFERENCE CALL WITH D. STERMER, D. BAKALAR, AND ██████████ REGARDING STATUS OF CONSTRUCTION; REVIEW ██████████ CONTRACTS.	0.80	
06/09/24	MJN	FURTHER REVISE STATEMENT OF ACCOUNT [.5 NO CHARGE]	0.00	N/C

F E E S

Date	Attorney	Description	Hours	
06/10/24	JSW	IDENTIFY AND VET ENGINEERING FIRMS REGARDING ASSOCIATION ISSUES AND COST TO REPAIR; TEL. CONFERENCES WITH ENGINEERING FIRMS; REVIEW ENGINEERING REPORTS AND CITY INFORMATION ON RECEIVER'S WEBSITE; PROVIDE PERTINENT INFORMATION VIA EMAIL TO ENGINEERING FIRMS FOR THEIR PROPOSALS	3.20	
06/10/24	BGR	PREP FOR AND ATTEND CALL WITH ██████████ AND COUNSEL	0.80	
06/10/24	BGR	REVIEW AND EDIT FEE REPORT [.3 NO CHARGE]	0.00	N/C
06/10/24	BGR	REVIEW CONSTRUCTION/REPAIR STATUS ISSUES AND ANALYZE ISSUES RELATED TO ██████████ AND ONGOING WORK	0.90	
06/10/24	LT	REVISIONS AND PREPARE INITIAL STATEMENT OF ACCOUNT ACTIVITIES FOR E-FILING.	0.50	
06/10/24	MJN	REVISE INITIAL STATEMENT OF ACCOUNT; CORRESPOND WITH D.STERMER REGARDING THE SAME.	0.40	
06/10/24	MJN	CORRESPOND WITH HERON POND TEAM REGARDING FEDERATED FOUNDATION. CONFERENCE CALL WITH COUNSEL FOR FEDERATED FOUNDATION	1.40	
06/10/24	MJN	WORK ON AGENDA/SCRIPT FOR ASSOCIATION MEETING.	1.20	
06/10/24	MJN	REVISE MOTION SEEKING AUTHORITY TO ENTER INTO INSURANCE CONTRACTS.	0.40	
06/11/24	JSW	TEL. CONFERENCE WITH JOHN PISTORINO, ENGINEER	0.50	
06/11/24	BGR	PREP FOR UNIT OWNER MEETING	1.20	
06/11/24	MJN	REVIEW INVOICES OF J. PARDO; CORRESPOND WITH J. PARDO REGARDING INVOICES AND STRATEGY FOR STATE COURT CASES; FOLLOW UP WITH TEAM REGARDING THE SAME.	0.60	
06/11/24	MJN	REVIEW UPDATED INSURANCE MOTION WITH DATA PROVIDED BY ASSURED PARTNERS; FOLLOW UP WITH TEAM REGARDING THE SAME; CORRESPOND WITH C. MARTINEZ.	0.70	
06/11/24	MJN	FINALIZE AND TRANSMIT PROPOSED OUTLINE/SCRIPT TO D. STERMER.	0.60	
06/12/24	JSW	REVIEW DRAFT LETTER TO JUDGE TUTOR RE DANIEL J. STERMER'S EMERGENCY MOTION FOR AUTHORITY TO ENTER INTO INSURANCE POLICIES AND THE TO BE FILED INSURANCE PREMIUM FINANCE AGREEMENT; REVIEW JUDGE'S DIVISIONAL INSTRUCTION RE	0.50	

F E E S

Date	Attorney	Description	Hours	
		EMERGENCY HEARINGS; REVIEW COMPLEX BUSINESS COURT RULES RE EMERGENCY HEARINGS; REVIEW ADMINISTRATIVE ORDERS RE EMERGENCY HEARING; PLAN COURSE OF ACTION TO HAVE MOTION HEARD BEFORE INSURANCE EXPIRES		
06/12/24	BGR	PREP FOR OWNER MEETING; WORK ON SCRIPT AND REVIEW QUESTIONS	1.60	
06/12/24	BGR	ATTEND TO INSURANCE ISSUES/MOTION	0.60	
06/12/24	CC	FINALIZE AND E-FILE RECEIVER'S MOTION FOR AUTHORITY TO ENTER INTO INSURANCE POLICIES. [.4 NO CHARGE]	0.00	N/C
06/12/24	CC	PREPARE, FINALIZE AND E-FILE NOTICE OF HEARING ON RECEIVER'S MOTION FOR APPROVAL TO ENTER INTO INSURANCE POLICIES (.40); CREATED EVENT IN CMS AND UPLOADED MOTION AND NOTICE OF HEARING (.20). [.6 NO CHARGE]	0.00	N/C
06/12/24	MJN	REVIEW G. SHOUP'S REVISIONS TO THURSDAY'S PRESENTATION.	0.40	
06/12/24	MJN	CORRESPOND WITH ASSURED PARTNERS REGARDING INSURANCE POLICIES.	0.20	
06/13/24	JSW	REVIEW ENGINEERING PROPOSAL FROM PISTORINO AND ALAM; CONF. CALL WITH MR. PISTORINO; REVIEW ENGINEERING PROPOSAL FROM MC CONSULTANTS; TEL. CONF. WITH CHRIS MORAN OR MC CONSULTANTS	2.10	
06/13/24	JSW	REVIEW EMAILS AND INFORMATION RE [REDACTED]	0.60	
06/13/24	BGR	PREP FOR AND ATTEND UNIT OWNER MEETING (2) REVIEW CONSTRUCTION RELATED ISSUES (.9)	2.90	
06/13/24	MJN	CORRESPOND WITH J. WERTMAN REGARDING HEARING ON INSURANCE CONTRACTS.	0.30	
06/13/24	MJN	FINALIZE INSURANCE MOTION.	0.80	
06/13/24	MJN	REVIEW PRIOR BOARD MINUTES; CORRESPOND WITH D. STERMER REGARDING THE SAME.	0.70	
06/13/24	MJN	PREPARE FOR AND ATTEND HERON POND COMMUNITY MEETING; REVIEW AND REVISE SCRIPT; MEET WITH D. STERMER AND TEAM REGARDING THE SAME. [2.6 NO CHARGE]	0.00	N/C
06/14/24	BGR	WORK ON DRAFT EMAIL REGARDING REPAIRS VERSUS SALE AND MULTIPLE EDITS AND FOLLOW-UP ON SAME	1.90	
06/14/24	BGR	REVIEW CONSTRUCTION RELATED ISSUES	0.70	

F E E S

Date	Attorney	Description	Hours	
06/14/24	MJN	REVIEW AND REVISE CORRESPONDENCE TO RESIDENTS; PREPARE POLL.	1.50	
06/14/24	MJN	CORRESPOND WITH TEAM REGARDING HEARING ON BBS BUILDERS [.3 NO CHARGE]	0.00	N/C
06/14/24	MJN	REVIEW AND REVISE MINUTES FROM MEETING TO POST ON WEBSITE.	0.60	
06/15/24	BGR	MULTIPLE CALLS WITH CLIENT ON STRATEGY AND REPAIR ISSUES	0.80	
06/15/24	BGR	WORK ON REPORT RELATED ISSUES NS EDIT DRAFT	0.80	
06/17/24	BGR	ATTEND TO TO SALE VERSUS REHAB ISSUES	0.90	
06/17/24	LT	DRAFT NOTICE OF FILING INSURANCE POLICIES; REDACT CORRESPONDING EXHIBITS FOR FILING; PREPARE SAME FOR E-FILING; PREPARE CORRESPONDING DOCUMENTS.	1.20	
06/17/24	MJN	REVIEW POLL RESULTS; CORRESPOND WITH D. STERMER REGARDING THE SAME; REVISE POLL TERMINOLOGY.	0.60	
06/17/24	MJN	SET MOTION TO EMPLOY BBS FOR HEARING. [.3 NO CHARGE]	0.00	N/C
06/17/24	MJN	REVISE NOTICE OF FILING TO INCLUDE INSURANCE QUOTES AND PREMIUM FINANCE AGREEMENT; REVIEW THE SAME.	0.80	
06/17/24	MJN	REVIEW UPDATED POLL RESULTS AND CORRESPOND WITH TEAM REGARDING THE SAME.	0.40	
06/17/24	MJN	REVIEW CASH FORECAST RELATED TO INSURANCE FINANCING.	0.40	
06/18/24	JSW	PREPARE FOR HEARING ON RECEIVER'S MOTION FOR AUTHORITY TO ENTER INTO INSURANCE POLICIES AND PREMIUM FINANCE AGREEMENT, INCLUDING REVIEW OF MOTIONS AND RELATED FILINGS; ATTEND HEARING; POST-HEARING RECAP, INCLUDING REVIEW OF PROPOSED ORDERS	1.70	
06/18/24	BGR	FOLLOW-UP ON POLL AND NEXT STEPS ON SAME [.6 NO CHARGE]	0.00	N/C
06/18/24	MJN	PREPARE DRAFT COMMUNITY WIDE MEETING NOTICE; CORRESPOND WITH D. STERMER REGARDING THE SAME	0.50	
06/18/24	MJN	REVIEW UPDATED POLL RESULTS; CORRESPOND WITH TEAM REGARDING THE SAME. [.3 NO CHARGE]	0.00	N/C
06/18/24	MJN	ATTEND HEARING ON MOTION TO APPROVE INSURANCE AND BBS BUILDERS; REVIEW AND	1.20	

F E E S

Date	Attorney	Description	Hours	
		REVISE ORDERS.		
06/18/24	MJN	PROVIDE UPDATED POLL RESULTS.	0.20	
06/19/24	BGR	CALLS WITH CLIENT AND WORK ON SALE/REHAB ISSUES	0.90	
06/19/24	BGR	WORK ON DETAILED ANALYSIS OF REHAB	2.50	
06/19/24	MJN	CORRESPOND WITH D. STERMER REGARDING CITY MEETING.	0.40	
06/19/24	MJN	WORK ON SECOND REPORT.	0.50	
06/19/24	MJN	RESEARCH REGARDING 718.118 AND TERMINATION AND BASIS BASED UPON PERCENTAGE OF DAMAGE	1.00	
06/20/24	BGR	ATTEND TO REHAB /SELL ISSUES - STRATEGY CALL	0.90	
06/20/24	BGR	WORK ON REPORT DRAFT ISSUES [.4 NO CHARGE]	0.00	N/C
06/20/24	BGR	WORK ON INSURANCE FOLLOW-UP ISSUES	0.40	
06/20/24	MJN	PREPARE SECOND MONTHLY REPORT OF RECEIVER.	2.70	
06/20/24	MJN	UPDATE POLL RESULTS AND RESEARCH UNIT NUMBERS.	0.60	
06/21/24	JSW	PREPARE FOR AND PARTICIPATE IN VIDEO CONFERENCE CALL WITH RECEIVER RE ENGINEERING PROPOSALS, NEXT STEPS, AND RELATED ISSUES [.8 NO CHARGE]	0.00	N/C
06/21/24	BGR	TEAM STRATEGY CALL TO REVIEW RESULTS AND WORK THROUGH CONSTRUCTION REHAB COSTS	1.30	
06/21/24	BGR	REVISE DRAFT SECOND REPORT	0.80	
06/21/24	BGR	FURTHER CALLS ON REHAB EXPENSES AND NEXT STEPS	0.80	
06/21/24	MJN	REVIEW DOR CATASTROPHIC REPORT FROM PROPERTY APPRAISER; REVIEW LIST OF EFFECTED UNITS.	0.60	
06/21/24	MJN	FURTHER RESEARCH ON 718.118 AND 718.117.	1.00	
06/21/24	MJN	REVIEW AND FURTHER REVISE SECOND REPORT.	0.60	
06/21/24	MJN	CONFERENCE CALL WITH D. STERMER, B. RICH, AND J. WERTMAN TO DISCUSS CONSTRUCTION AND ENGINEERING QUOTES;	0.80	
06/21/24	MJN	REVIEW AND CULL POLL RESPONSES; CONFIRM PROPERTY ADDRESSES AND UNIT OWNERS. PREPARE SUMMARY; REVISE SECOND REPORT REGARDING THE SAME.	2.20	

F E E S

Date	Attorney	Description	Hours
06/24/24	BGR	FINAL EDITS TO SECOND REPORT	0.80
06/24/24	BGR	DETAILED WORK ON REPORT	1.90
06/24/24	LT	FINALIZE RECEIVER'S SECOND MONTHLY REPORT AND PREPARE SAME FOR FILING (.60); FOLLOW-UP AND CONFIRM UPCOMING DEADLINES (.10).	0.70
06/24/24	MJN	REVIEW INFORMATION FROM PROPERTY APPRAISER; CORRESPOND WITH D. STERMER REGARDING DAMAGE FORM.	0.50
06/24/24	MJN	REVIEW AND REVISE SECOND REPORT; PREPARE FOR FILING.	0.70
06/24/24	MJN	REVIEW CORRESPONDENCE FROM ASSURED PARTNERS REGARDING INSURANCE.	0.20
06/25/24	JSW	REVIEW ENGINEERING PROPOSAL FROM THORTON TOMESSETTI	0.40
06/25/24	BGR	DETAILED ANALYSIS OF REHAB VERSUS SALE OPTIONS	1.90
06/25/24	BGR	ADDRESS ISSUES RELATED TO ENGINEER AND REHAB ISSUES	0.60
06/25/24	MJN	WORK ON OWNER CONTACT INFORMATION RECONCILIATION.	0.30
06/26/24	BGR	WORK ON REHAB AND DRAFT REPORT ISSUES	1.80
06/26/24	MJN	REVIEW CORRESPONDENCE FROM FEDERATED FOUNDATION; REVIEW PRIOR CORRESPONDENCE AND RELATED CONTRACTS.	0.40
06/26/24	MJN	CORRESPOND WITH EISINGER LAW REGARDING OWNER LIST; REVIEW OWNER INFORMATION.	0.40
06/27/24	BGR	CALLS RELATED TO INSPECTION AND REHAB	2.30
06/28/24	BGR	CALLS REGARDING INSPECTION AND BUILDING STATUS	0.90
06/28/24	MJN	REVIEW AND REVISE COMMUNICATION TO UNIT OWNERS.	0.40
Total Hours:			89.70
Total Fees:			61,324.50

F E E S U M M A R Y

Attorney	Hours	Rate	Total
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FEE SUMMARY

Attorney	Hours	Rate	Total
Carmen Cruz	0.00	0.00	0.00
Michael J. Niles	40.70	635.00	25,844.50
Brian G. Rich	36.60	750.00	27,450.00
Luis Torres	2.40	325.00	780.00
Jeffrey Wertman	10.00	725.00	7,250.00
Total	89.70		\$61,324.50

CURRENT BALANCE DUE **\$61,324.50**

PRIOR BALANCE 66,482.29

LESS PAYMENTS: -0

PRIOR BALANCE DUE 66,482.29

PLUS CURRENT BALANCE: 61,324.50

TOTAL NOW DUE: **127,806.79**

PAST DUE BALANCE - LIST OF UNPAID INVOICE(S)

INVOICE NUMBER	INVOICE DATE	TOTAL	LAST PAYMENT DATE	LAST PAYMENT AMOUNT	BALANCE
280435	06/07/24	66,482.29	NONE	0.00	66,482.29
Past Due Balance:					66,482.29