

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA

DANIEL J. STERMER AS RECEIVER OF THE  
HERON POND CONDOMINIUM  
ASSOCIATION, INC.,

Plaintiff,

v.

HERON POND CONDOMINIUM  
ASSOCIATION, INC., AND ALL UNIT  
OWNERS LISTED ON EXHIBIT “D” AND  
OTHER INTERESTED PARTIES LISTED ON  
EXHIBIT “E” TO THE COMPLAINT,

Defendants.

Case No.: 0:25-cv-61909

**RECEIVER/TERMINATION TRUSTEE’S UNOPPOSED MOTION TO  
STAY DECEMBER 11, 2025 HEARING ON THE PRELIMINARY INJUNCTION  
MOTION AND TO SET A STATUS CONFERENCE**

Plaintiff, Daniel J. Stermer, solely in his capacities as Receiver of the Heron Pond Condominium Association, Inc. and as Termination Trustee (the “Receiver/Termination Trustee”), respectfully moves the Court to stay the hearing currently scheduled for December 11, 2025, on the Federal National Mortgage Association’s and the Federal Home Loan Mortgage Corporation’s (together, the “Enterprises”) Motion for Preliminary Injunction (“Injunction Motion”), and to set a status conference at the Court’s convenience.

**Procedural Background**

The Enterprises filed the Injunction Motion on September 24, 2025. *See* ECF No. 4. The Court thereafter set briefing deadlines and scheduled a hearing on the Injunction Motion for December 4, 2025, at 9:00 a.m., in Courtroom 207A, 299 East Broward Boulevard, Fort Lauderdale, Florida 33301. *See* ECF No. 19. The Receiver/Termination Trustee, the Enterprises, and Integra Real Estate LLC (“Integra”) (collectively, the “Parties”) then engaged in discussions to reach a potential resolution with respect to the Injunction Motion and related issues. On

November 18, 2025, the Court continued the hearing to December 11, 2025, by a Paperless Order. *See* ECF No. 33.

The Parties have since reached a resolution in principle of the issues raised by the Injunction Motion that, if approved, will render the Injunction Motion moot. *See* ECF Nos. 31 & 32.

The Parties are presently working with the title company that will handle the closing to finalize an amended joint stipulation with limited revisions that focus on closing logistics without altering the substance of the Parties' agreement (the "Amended Joint Stipulation"). The Parties intend to file the Amended Joint Stipulation together with a motion to approve it. In addition, the Receiver/Termination intends to file a sale motion (the "Sale Motion") and proposed order seeking approval of the Purchase and Sale Agreement with Integra. The Receiver/Termination Trustee anticipates requesting that the Sale Motion be set for hearing on no less than fourteen (14) days' notice to allow adequate time for review.

### **Relief Requested**

In light of the foregoing, and to conserve judicial and party resources, the Receiver/Termination Trustee respectfully submits that good cause warrants staying the hearing previously set for December 11, 2025, and setting a status conference at the Court's convenience to address next steps and scheduling on the anticipated filings. The Enterprises and Integra do not oppose staying the December 11, 2025 hearing or setting a status conference.

Accordingly, the Receiver/Termination Trustee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**:

1. Staying the December 11, 2025 hearing on the Enterprises' Injunction Motion; and
2. Setting a status conference at the Court's convenience to address the anticipated Amended Joint Stipulation, the forthcoming Sale Motion and proposed order, and related scheduling, including a hearing on the Sale Motion with at least fourteen (14) days' notice.

**Local Rule 7.1(a)(3) Certification**

Undersigned counsel certifies that he has conferred with counsel for the Enterprises, who do not oppose the relief requested herein. Integra also consents.

DATED this 4th day of December, 2025.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that the forgoing was served on December 4, 2025, by electronic transmission through the Court's CM/ECF system upon all parties registered to receive electronic service in this case.

By: /s/ Brian G. Rich

# EXHIBIT A

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HERON POND CONDOMINIUM  
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Defendants.

Case No.: 0:25-cv-61909

**ORDER GRANTING  
RECEIVER/TERMINATION TRUSTEE’S UNOPPOSED MOTION TO  
STAY DECEMBER 11, 2025 HEARING ON THE PRELIMINARY  
INJUNCTION MOTION AND TO SET A STATUS CONFERENCE**

**THIS MATTER** came before the Court on the *Receiver/Termination Trustee’s Unopposed Motion to Stay December 11, 2025 Hearing on the Preliminary Injunction Motion and to Set a Status Conference* (the “Motion”) filed by Plaintiff, Daniel J. Stermer as Receiver and Termination Trustee of the Heron Park Condominium Association, Inc. Acknowledging that the Enterprises<sup>1</sup> and Integra do not oppose the Motion, and for good cause shown, the Court Orders that:

- 1) The Motion is **GRANTED**.
- 2) The hearing on the Preliminary Injunction Motion set for December 11, 2025, is **STAYED**; and
- 3) The Court will set a status conference at the Court’s convenience to address the

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<sup>1</sup> Capitalized terms used herein shall have the same meaning as in the Motion.

anticipated Amended Joint Stipulation, the forthcoming Sale Motion and proposed order, and related scheduling, including a hearing on the Sale Motion.

DONE AND ORDERED in Fort Lauderdale, Florida, this \_\_\_\_ day of December, 2025.

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Rodney Smith  
United States District Judge

Copied furnished to:  
Counsel of Record