

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

STATE OF FLORIDA, OFFICE OF FINANCIAL
REGULATION,

CASE NO.: 07-43672 CA 09

Plaintiff,

v.

BERMAN MORTGAGE CORPORATION, a
Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation, DANA
J. BERMAN, as Owner and Managing Member,

Defendant.

and,

DB ATLANTA, LLC, a Florida Limited Liability
Company, **DB DURHAM, LLC**, a Florida
Limited Liability Company, **NORMANDY
HOLDINGS II, LLC**, a Florida Limited Liability
Company, **NORMANDY HOLDINGS III, LLC**,
a Florida Limited Liability Company,
ACQUISITIONS, LLC, a Florida Limited
Liability Company, **DBKN GULF
INCORPORATED**, a Florida Limited Liability
Company, **OCEANSIDE ACQUISITIONS,
LLC**, a Florida Limited Liability Company, **DB
BILOXI, LLC**, a Florida Limited Liability
Company, **DB BILOXI II, LLC**, a Florida
Limited Liability Company, **DB BILOXI III,
LLC**, a Florida Limited Liability Company, **DBDS
VERO BEACH, LLC**, a Florida Limited Liability
Company, **DB TAMPA, LLC**, a Florida Limited
Liability Company, **DB SIMPSONVILLE, LLC**,
a Florida Limited Liability Company,
REDLANDS RANCH HOLDINGS, LLC, a
Florida Limited Liability Company, **DB
CARROLL STREET, LLC**, a Florida Limited
Liability Company,

Relief Defendants.

THE ORIGINAL
FILED ON:

OCT 07 2008

IN THE OFFICE OF
CIRCUIT COURT DADE CO. FL.

**RECEIVER'S MOTION FOR COURT ORDER AUTHORIZING
DISTRIBUTION REGARDING SOUTHCHASE MORTGAGE**

Michael I. Goldberg, as Court Appointed Receiver, moves this Court for entry of an Order authorizing certain distributions with respect to the mortgage involving the property owned by Southchase, and as grounds therefore states:

1. On December 11, 2007, Michael I. Goldberg, was appointed as Receiver over Defendant, M.A.M.C. Incorporated.
2. M.A.M.C. Incorporated was a loan servicer, servicing approximately \$192 million dollars in loans. The funds for the loans were provided from approximately 640 investors.
3. One of the loans made by the investors and serviced by M.A.M.C. was to a borrower Southchase.
4. Southchase defaulted on the Notes and Mortgages and M.A.M.C. Incorporated hired James D. Gassenheimer, P.A. to foreclose Notes and Mortgages. During the pendency of the foreclosure action, M.A.M.C. was under law receivership and James D. Gassenheimer joined the Berger Singerman law firm. From the point of the receivership, Berger Singerman, P.A. continued to act as counsel for M.A.M.C. Incorporated and the group of lenders with respect to the foreclosure action.
5. Berger Singerman, P.A. has negotiated a settlement agreement with the borrower which resulted in an initial down payment of \$50,000.00.
6. Berger Singerman, P.A. has been representing Michael I. Goldberg, as Receiver in this and many other aspects of this complicated receivership case. Currently, Berger Singerman, P.A. is owed an excess of \$400,000.00 in legal fees and costs associated with its representation.

7. The Receiver believes that it is appropriate to seek an order authorizing the payment of outstanding attorneys' fees and costs and receivership fees with respect to this loan.

8. This Court in its Temporary Injunction and Agreed Order Appointing Receiver dated December 11, 2007, at paragraph 19, authorize the Receiver to employ, without further order of the court, such employees, accountants and attorneys, etc., as is necessary and proper for the collection, preservation, maintenance and operation of the Receivership assets. The Receiver was further authorized in the aforementioned Order to collect any and all sums of money due and owing to the Receivership Defendants.

9. Pursuant to paragraph 23 of the same Order, the Receiver and his retained professionals are entitled to reasonable compensation and expenses recovered from receivership assets. The Receiver is authorized to pay from Receivership Estate funds eighty (80%) percent of the ordinary and reasonable fees and one hundred (100%) percent of the costs of such outside professionals upon receipt of a bill from outside professionals. The Order further authorizes payment of fees in full upon application of the Court for approval of all fees and expenses.

10. Attached hereto and made a part hereof, are copies of bills reflecting legal fees, costs advanced, the retainer agreement and costs statements of James D. Gassenheimer, P.A. and bills of Berger Singerman, P.A. showing outstanding invoices for attorneys fees and costs advanced in the amount of \$11,264.20, and \$14,821.63 respectively.

11. Further the Receiver seeks authority to pay \$10,000 from the Southchase recovery to Michael Goldberg, as Receiver, for his work associated with this project. Michael Goldberg as Receiver conducted a group wide lender meeting regarding this loan, incurred conference calling fees associated with this call. The Receiver further has conducted various meetings with counsel to review all loans in progress and to monitor and provide input in all litigation strategies

on a weekly basis. Some of the time was devoted to the Southchase loan. The Receiver has further devoted time to conference calls from the lender committee regarding this loan to provide advice and input.

12. The Receiver further seeks Court authority to distribute the balance of the \$50,000.00 to M.A.M.C. for operating expenses as an initial payment of the one (1%) percent of interest owed to M.A.M.C. as loan servicing fees. M.A.M.C. requires these funds as a priority for operating expenses.

13. The Receiver hereby certifies that a copy of this Motion has been distributed by electronic mail to all lenders and has been posted on the M.A.M.C. Receiver website for review. Each lender has the opportunity to file an objection on or before the date of the hearing, as to the requested relief.

WHEREFORE, the Receiver moves for the aforementioned relief.

Respectfully submitted,

BERGER SINGERMAN
1000 Wachovia Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

By: 

JAMES D. GASSENHEIMER
Florida Bar No. 959987

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 7th day of October 2008, to: **Cristina Saenz, Assistant General Counsel**, STATE OF FLORIDA, OFFICE OF FINANCIAL REGULATION, 401 N.W. 2nd Avenue, Suite N-708, Miami, Florida 33128; and to All the Lenders/Investor Group by Electronic Mail.

By: _____

JAMES D. GASSENHEIMER

1739725-1

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AKERMAN SENTERFITT
MICHAEL I. GOLDBERG, RECEIVER
350 EAST LAS OLAS BLVD
16TH FLOOR
FT. LAUDERDALE, FLORIDA 33301-2229

INVOICE DATE: 3/10/2008
INVOICE NO. 45780

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 2/29/2008

			HOURS	
2/4/2008	JG1	PREPARE FOR AND ATTEND INVESTOR MEETING.	1.50	
2/5/2008	JG1	TELEPHONE CONFERENCE WITH M. GOLDBERG.	0.40	
		SUB-TOTAL FEES:	1.90	<u>741.00</u>

RATE SUMMARY

JAMES GASSENHEIMER	1.90 HOURS	390.00/HR	741.00
TOTAL	<u>1.90</u>		

TOTAL CURRENT BILLING: 741.00

PREVIOUS BALANCE DUE: 0.00

PAYMENTS 0.00

TOTAL NOW DUE: 741.00

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.



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INVOICE DATE: 4/7/2008
INVOICE NO. 46889

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 3/31/2008

			HOURS	
3/7/2008	JCC	REVIEW MAMC V. SOUTHCHASE FILE.	0.70	
3/14/2008	JCC	DRAFT LETTER TO COUNSEL REGARDING AGREEMENT ON MOTION FOR LEAVE TO AMEND; SET MOTION FOR HEARING.	0.20	
3/17/2008	JCC	ATTEND TO STIPULATION FOR SUBSTITUTION OF COUNSEL; REVIEW LETTER FROM MR. ROSE; DRAFT LETTER IN RESPONSE TO MR. ROSE'S LETTER.	0.90	
3/18/2008	JCC	ATTEND TO GETTING HEARING MOTION ON MOTION FOR LEAVE TO AMEND; ELECTRONIC COMMUNICATION WITH OPPOSING COUNSEL REGARDING MOTION FOR LEAVE TO AMEND; DRAFT LETTER TO JUDGE REGARDING PROPOSED ORDER GRANTING MOTION FOR LEAVE TO AMEND; DRAFT LETTER TO OPPOSING COUNSEL TRANSMITTING PROPOSED ORDER ON MOTION FOR LEAVE TO AMEND AND LETTER TO JUDGE.	0.70	
3/20/2008	JCC	FINALIZE LETTER TO JUDGE ENCLOSING PROPOSED ORDER GRANTING MOTION FOR LEAVE TO AMEND.	0.10	
3/24/2008	JCC	DETERMINE STATUS OF ORDER ON MOTION FOR LEAVE TO AMEND COMPLAINT.	0.10	
3/31/2008	JG1	REVIEW SETTLEMENT OFFER FROM BORROWER AND CONFERENCE WITH J. CUNNINGHAM.	0.50	
		SUB-TOTAL FEES:	3.20	1,275.00

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	2.70 HOURS	400.00/HR	1,080.00
JAMES GASSENHEIMER	0.50 HOURS	390.00/HR	195.00
TOTAL	3.20		

EXPENSES

PHOTOCOPIES

19.00

AKERMAN SENTERFITT

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LONG DISTANCE TELEPHONE
FACSIMILE

6.97
14.00
SUB-TOTAL 39.97

TOTAL CURRENT BILLING: 1,314.97

PREVIOUS BALANCE DUE: 741.00

PAYMENTS 0.00

TOTAL NOW DUE: 2,055.97

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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MICHAEL I. GOLDBERG, RECEIVER
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INVOICE DATE: 5/9/2008
INVOICE NO. 48189

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 4/30/2008			HOURS
1/7/2008	JCC	CONFERENCE WITH LOURDES REGARDING HEARING ON MOTION TO COMPEL; REVIEW DOCUMENTS REGARDING SAME AND ATTENDING TO CALENDARING.	0.10
4/4/2008	JCC	REVIEW DRAFT MOTION.	0.10
4/7/2008	LBS	REVIEW PURCHASE AGREEMENT FROM JOE CARELLO AND EMAIL TO HAL, PREPARE COMMENTS TO MORTGAGE PURCHASE AGREEMENT, TELEPHONE CONFERENCE WITH JAMES, TELEPHONE CONFERENCE WITH HAL.	3.00
4/8/2008	JCC	REVIEW FILE FOR SERVICE OF PROCESS ON NEW DEFENDANT; TELEPHONE CONFERENCE WITH MR. ADAM SKOLNIK (OF SOUTH FLORIDA MEDICAL REALTY AND INVESTMENT II); REVIEW FLORIDA STATUTORY LAW IN SERVICE OF PROCESS ON LIMITED LIABILITY COMPANY; TELEPHONE CONFERENCE WITH DANIEL ROSE.	1.10
4/11/2008	LBS	TELEPHONE CONFERENCE WITH HAL, PREPARE BROKER ENGAGEMENT LETTER AND FORWARD TO JOE CARELLO.	3.00
4/15/2008	JCC	DRAFT WAIVER OF SERVICE NOTICE; DRAFT LETTERS TO MR. ROSE AND MR. SKOLNIK.	0.70
4/17/2008	JCC	REVIEW WAIVER OF SERVICE OF PROCESS FOR SOUTH FLORIDA MEDICAL REALTY; REVIEW SOUTHCHASE COMMERCE CENTER'S ANSWER TO SECOND AMENDED COMPLAINT.	0.20
4/17/2008	LBS	REVIEW BROEKR'S ENGAGEMENT DOCUMENT, TELEPHONE CONFERENCE WITH HAL.	1.00
4/21/2008	JCC	DRAFT CONSENT JUDGMENT.	0.50
4/25/2008	JCC	REVIEW FILE TO DETERMINE STATUS OF INDIVIDUAL DEFENDANTS.	0.40
4/25/2008	JCC	REVIEW FILE TO DETERMINE STATUS OF DEFENDANTS AND DRAFT CHART ON SAME.	0.40

4/25/2008	JCC	DRAFT LETTER TO MR. MARK REGARDING HIS CLIENT'S ANSWER TO SECOND AMENDED COMPLAINT.	0.10
4/25/2008	JCC	DRAFT CONSENT JUDGMENT AGAINST SOUTH FLORIDA MEDICAL; AND DRAFT LETTER TO MR. ROSE REGARDING SAME.	1.40
4/25/2008	JCC	DRAFT MOTION FOR FINAL SUMMARY JUDGMENT.	0.30
4/28/2008	JG1	REVIEW SOUTH CHASE AFFIDAVIT; EMAIL TO CLIENT.	0.30
SUB-TOTAL FEES:			12.60
			<u>4,932.00</u>

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	5.30 HOURS	400.00/HR	2,120.00
JAMES GASSENHEIMER	0.30 HOURS	390.00/HR	117.00
LAWRENCE STEINBERG	7.00 HOURS	385.00/HR	2,695.00
TOTAL			<u>12.60</u>

EXPENSES

FACSIMILE	2.00
PHOTOCOPIES	323.50
LONG DISTANCE TELEPHONE	0.43
SUB-TOTAL	<u>325.93</u>

TOTAL CURRENT BILLING: 5,257.93

PREVIOUS BALANCE DUE: 2,055.97

PAYMENTS 0.00

TOTAL NOW DUE: 7,313.90

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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INVOICE DATE: 6/10/2008
INVOICE NO. 49491

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 5/31/2008				HOURS
5/5/2008	JCC	TELEPHONE CALL TO BRIAN MARK REGARDING HIS CLIENT'S ANSWER.		0.10
5/6/2008	JCC	TELEPHONE CALL TO BRIAN MARK.		0.10
5/19/2008	JCC	WORKING WITH MRS. HOLNESS TO OBTAIN FINAL HEARING AND TELEPHONE CALL TO JUDGE'S CHAMBERS REGARDING SAME.		0.30
5/19/2008	JCC	FINALIZE SUMMARY JUDGMENT MOTION.		0.10
5/19/2008	JCC	DRAFT NOTICE OF FILING AFFIDAVIT.		0.20
5/19/2008	JCC	REVIEW DRAFT STIPULATION FOR HEARING.		0.10
5/19/2008	JCC	TELEPHONE CONFERENCE WITH JUDGE'S OFFICE REGARDING SCHEDULING HEARING ON MOTION FOR FINAL SUMMARY JUDGMENT.		0.10
5/19/2008	JCC	DRAFT LETTER TO COUNSEL REGARDING STIPULATION FOR REFERRAL TO MAGISTRATE OF FINAL SUMMARY JUDGMENT.		0.20
5/19/2008	JCC	DRAFT ELECTRONIC COMMUNICATION TO MR. GASSENHEIMER REGARDING STATUS.		0.10
5/19/2008	LBS	TELEPHONE CONFERENCE WITH HAL.		0.20
5/20/2008	JCC	REVIEW DRAFT STIPULATION FROM FILE; FORWARD SAME TO MRS. RODZ.		0.20
5/20/2008	JCC	ADDITIONAL FOLLOW-UP COMMUNICATION TO MS. RODZ		0.10
5/20/2008	LBS	CORRESPONDENCE WITH HAL REGARDING ACCEPTABLE REPS AND WARRANTIES FOR RECEIVER, TELEPHONE CONFERENCE WITH HAL.		0.30
5/27/2008	JCC	ELECTRONIC MAIL TO MRS. RODZ REGARDING SCHEDULING HEARING.		0.10
5/29/2008	JCC	FINALIZE AFFIDAVIT OF MR. GOLDBERG.		0.60
5/29/2008	JCC	TELEPHONE CONFERENCE WITH MR. GOLDBERG'S SECRETARY REGARDING EXECUTION OF AFFIDAVIT BY MR. GOLDBERG.		0.10

5/29/2008	JCC	FINALIZE MOTION FOR FINAL SUMMARY JUDGMENT AND PREPARE FOR FILING.	0.20	
5/29/2008	JCC	DRAFT LETTER TO MR. ROSE REGARDING STATUS OF HIS CLIENTS' INTEREST IN CASE.	0.20	
5/30/2008	JCC	TELEPHONE CALL TO MR. BRIAN MARK REGARDING AGREED ORDER.	0.10	
5/30/2008	JCC	REVISE LETTER TO MR. ROSE.	0.10	
5/30/2008	JCC	ELECTRONIC MEMORANDUM TO OPPOSING COUNSEL REGARDING HEARING ON 8/3/08.	0.20	
SUB-TOTAL FEES:			3.70	<u>1,472.50</u>

RATE SUMMARY			
JAMES C CUNNINGHAM, JR.	3.20 HOURS	400.00/HR	1,280.00
LAWRENCE STEINBERG	0.50 HOURS	385.00/HR	192.50
TOTAL		<u>3.70</u>	

EXPENSES

	POSTAGE	5.74
	LONG DISTANCE TELEPHONE	4.46
	PHOTOCOPIES	57.50
	FACSIMILE	67.00
4/15/2008	FEDERAL EXPRESS CHARGES.	11.40
4/16/2008	FEDERAL EXPRESS CHARGES.	8.40
5/9/2008	FEDERAL EXPRESS CHARGES.	8.60
SUB-TOTAL		<u>163.10</u>

TOTAL CURRENT BILLING:	1,635.60
PREVIOUS BALANCE DUE:	7,313.90
PAYMENTS	0.00
TOTAL NOW DUE:	<u>8,949.50</u>

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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INVOICE DATE: 7/9/2008
INVOICE NO. 50622

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 6/30/2008

			HOURS	
6/5/2008	JCC	TELEPHONE CONFERENCE WITH BRIAN MARK REGARDING STATUS OF CASE.	0.40	
6/5/2008	JCC	ELECTRONIC COMMUNICATION WITH MR. GASSENHEIMER REGARDING OFFER.	0.10	
6/5/2008	JCC	TELEPHONE CONFERENCE WITH ADAM SKOLNICK AND DANIEL ROSE REGARDING PURCHASE OF PROMISSORY NOTE.	0.20	
6/10/2008	JCC	TELEPHONE CALL TO MS. RODZ REGARDING HEARING.	0.10	
6/10/2008	JCC	DRAFT LETTER TO JUDGE REGARDING ORDER ON DEFAULT.	0.90	
6/11/2008	JCC	TELEPHONE CALL TO MRS. RODZ CONCERNING HEARING (.1); TELEPHONE CALL TO JUDGE'S CHAMBERS REGARDING ARRANGING HEARING ON MOTION FOR FINAL SUMMARY JUDGMENT.	0.30	
6/16/2008	JCC	FINALIZING HEARING ON MOTION FOR SUMMARY FINAL JUDGMENT.	0.10	
SUB-TOTAL FEES:			2.10	840.00

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	2.10 HOURS	400.00/HR	840.00
TOTAL	2.10		

AKERMAN SENTERFITT

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TOTAL CURRENT BILLING: 840.00

PREVIOUS BALANCE DUE: 8,949.50

PAYMENTS 0.00

TOTAL NOW DUE: 9,789.50

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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INVOICE DATE: 8/6/2008
INVOICE NO. 51621

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 7/31/2008

HOURS

7/14/2008	JCC	REVIEW ELECTRONIC MAIL FROM MS. RODZ REGARDING CANCELLATION OF HEARING.	0.10
7/17/2008	JCC	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING RESETTING HEARING ON MOTION FOR SUMMARY JUDGMENT.	0.20
7/17/2008	JCC	REVIEW GUIDELINES FOR PROFESSIONAL CONDUCT; DRAFT ELECTRONIC MAIL TO MR. GASSENHEIMER REGARDING REQUEST FOR NEW HEARING DATE ON MOTION FOR SUMMARY JUDGMENT.	0.20
7/25/2008	JCC	ELECTRONIC COMMUNICATION WITH MR. GASSENHEIMER; DRAFT MOTION FOR PROTECTIVE ORDER ON RECENTLY SERVED DISCOVERY; SET MOTION FOR HEARING; DRAFT ELECTRONIC MAIL TO OPPOSING COUNSEL IN AN EFFORT TO RESOLVE THE MOTION FOR PROTECTIVE ORDER.	3.00
7/25/2008	JCC	REVIEW MEMORANDUM AND MOTION ON MOTION FOR CONTINUANCE;.	0.30
7/28/2008	JCC	CONFERENCE WITH MR. GASSENHEIMER REGARDIGN STATUS OF CASE AND HEARING ON SUMMARY JUDGMENT.	0.30
7/28/2008	JCC	DRAFT RESPONSE TO MOTION FOR CONTINUANCE.	1.50
7/28/2008	JCC	DRAFT LETTER TO JUDGE ENCLOSING DOCUMENTS.	0.80
7/28/2008	JCC	REVIEW AND ANALYZE PROPOSED SETTLEMENT AGREEMENT.	0.30
7/28/2008	JG1	CONFERENCE WITH J. CUNNINGHAM ON STRATEGY.	0.40
7/28/2008	JG1	FOLLOW-UP CONFERENCE WITH J. CUNNINGHAM ON SETTLEMENT/BANKRUPTCY THREAT.	0.30
7/28/2008	JG1	TELEPHONE CONFERENCE WITH M. GOLDBERG ON SETTLEMENT.	0.40
7/28/2008	JG1	REVIEW SETTLEMENT OFFER AND EXCHANGE WITH RECEIVER.	0.40

AKERMAN SENTERFITT

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7/28/2008	JG1	CONFERENCE CALL WITH J. CUNNINGHAM ON STRATEGY.	0.50	
7/29/2008	JG1	REVIEW ASSIGNMENT OF SALE BID, EMAIL TO M. GOLDBERG.	0.20	
7/29/2008	JG1	DRAFTED REPORT ON SETTLEMENT.	0.40	
SUB-TOTAL FEES:			9.30	<u>3,694.00</u>

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	6.70 HOURS	400.00/HR	2,680.00
JAMES GASSENHEIMER	2.60 HOURS	390.00/HR	1,014.00
TOTAL	<u>9.30</u>		

EXPENSES

FACSIMILE	76.00
PHOTOCOPIES	83.50
LONG DISTANCE TELEPHONE	1.49
SUB-TOTAL	<u>160.99</u>

TOTAL CURRENT BILLING: 3,854.99

PREVIOUS BALANCE DUE: 9,789.50

CREDITS/PAYMENTS . 0.00

TOTAL NOW DUE: 13,644.49

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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AKERMAN SENTERFITT
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INVOICE DATE: 9/8/2008
INVOICE NO. 53048

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 8/31/2008

HOURS

8/1/2008	JCC	DRAFT SETTLEMENT AGREEMENT, LETTER TO MS. RODZ AND MEMO TO MR. GASSENHEIMER.	1.80	
8/22/2008	JCC	TELEPHONE CONFERENCE WITH MR. RODZ OFFICE; ELECTRONIC MAIL TO MS. RODZ	0.20	
SUB-TOTAL FEES:			2.00	<u>800.00</u>

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	2.00 HOURS	400.00/HR	800.00
TOTAL	<u>2.00</u>		

EXPENSES

7/28/2008	FEDERAL EXPRESS CHARGES.	10.02
7/28/2008	FEDERAL EXPRESS CHARGES.	10.02
SUB-TOTAL		<u>20.04</u>

TOTAL CURRENT BILLING: 820.04

PREVIOUS BALANCE DUE: 13,644.49

CREDITS/PAYMENTS 0.00

TOTAL NOW DUE: 14,464.53

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

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AKERMAN SENTERFITT
MICHAEL I. GOLDBERG, RECEIVER
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INVOICE DATE: 10/6/2008
INVOICE NO. 54288

SOUTHCHASE COMMERCE CENTER - FORECLOSURE

MATTER ID: 12293-0005

PROFESSIONAL FEES RENDERED THROUGH: 9/30/2008

			HOURS	
9/9/2008	JCC	FINALIZE AND FORWARD FINAL SETTLEMENTS DOCUMENTS TO MS. RODZ	0.20	
9/19/2008	JCC	DRAFT LETTER TO ALIETE RODZ REGARDING AGREEMENT.	0.10	
9/23/2008	JG1	REVIEW STATUS OF SETTLEMENT REPORT TO CLIENT.	0.50	
9/25/2008	JCC	ELECTRONIC COMMUNICATION WITH MR. GASSENHEIMER REGARDING STATUS.	0.10	
SUB-TOTAL FEES:			0.90	<u>355.00</u>

RATE SUMMARY

JAMES C CUNNINGHAM, JR.	0.40 HOURS	400.00/HR	160.00
JAMES GASSENHEIMER	0.50 HOURS	390.00/HR	195.00
TOTAL	<u>0.90</u>		

EXPENSES

PHOTOCOPIES

	2.10
SUB-TOTAL	<u>2.10</u>

TOTAL CURRENT BILLING: 357.10

PREVIOUS BALANCE DUE: 14,464.53

CREDITS/PAYMENTS 0.00

TOTAL NOW DUE: 14,821.63

PAYMENT DUE UPON RECEIPT. PLEASE NOTE ACCOUNT NUMBER ON CHECK.

THE GASSENHEIMER LAW FIRM

James D. Gassenheimer
Board Certified Civil Trial Lawyer

Andrew D. Craven
Kevin D. Franz
Monica F. Klein
Shana K. Rahavy
Raymie E. Walsh

Date: May 1, 2007

To: M.A.M.C. Incorporated
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133
Attn: Alan L. Goldberg, CRO

Re: **Engagement of James D. Gassenheimer, P.A.**
Mortgage Foreclosure Action Adverse Southchase Commerce Center
Our file No. 400-008

Dear Sirs:

This letter will set forth the terms on which you engage the law firm James D. Gassenheimer, P.A., to represent you and your related entities in your ongoing legal matters. We feel that it is important that both the client and the attorneys understand the terms of engagement so that there are no unfulfilled expectations in the future.

1) **Facts of the Representation.** Prior to the execution of this engagement agreement, you related to us the facts regarding the litigation in which you have requested we represent you. To properly evaluate the likelihood of success of your position, and to prevent James D. Gassenheimer, P.A., from advocating legal and factual positions which may be unviable or untrue, you acknowledge that James D. Gassenheimer, P.A., commences this matter in reliance that your statements to us are truthful and complete to the best of your knowledge. Briefly summarized, the facts of the matter as you have related them to us are as follows:

Prosecute a Mortgage Foreclosure Action Adverse Southchase Commerce Center
The basis for foreclosure is monetary default

2) **Services to be Provided.** James D. Gassenheimer, P.A., services may include preparation of contracts, complaints, answers and other pleadings as may be required to adequately prosecute the suit, attendance at depositions and investigations, work with expert witnesses and other associated personnel, appearances in court and administrative hearings, preparation of witnesses, attendance meetings with opposing counsel and such other actions as may be required to advance your position in the litigation.

EXHIBIT

tabbles

"B"

3) Successful Result. For purposes of this engagement letter, James D. Gassenheimer, P.A., will be deemed to have achieved a successful result in the case, if one or more of the following events occurs:

- (1) Settlement on terms acceptable to the client;**
- (2) Obtain a final judgment of foreclosure and sale; then, proceed to consummate the foreclosure sale on behalf of, and, at the direction of the client.**

4) Non-contingent Hourly Fee; Advance, Non-Refundable Retainer. James D. Gassenheimer, P.A., will be employed to work on this matter at hourly rates, **\$225** for partners, **\$165** for associate attorneys and **\$110** for paralegals. These rates are per attorney hour for time spent, due and payable monthly. The advance retainer is a minimum fee, and, among other things, is partial compensation for James D. Gassenheimer, P.A., entering into this attorney/client relationship with me, which may keep James D. Gassenheimer, P.A., from working on other matters. The initial attorneys' time will be charged against the advance retainer; after that, James D. Gassenheimer, P.A., will bill you for its services rendered each month. You shall pay those fees within fifteen (15) days of each bill. Any bills not paid within fifteen (15) days of each billing shall bear interest at the rate of twelve percent (12%) per annum, from date of rendition of services.

5) Control of Litigation. James D. Gassenheimer, P.A., shall, in its sole discretion, determine the amount of time to be expended on my case, the individual attorneys who are to perform the work, and the nature of the services to be performed.

6) Reasonable Fee. Should you settle this suit against James D. Gassenheimer, P.A.'s advice, or should James D. Gassenheimer, P.A., withdraw from representing you for any of the reasons in paragraph 8 (a,) (b,) (c,) or (d,) James D. Gassenheimer, P.A., shall be entitled to receive from you immediately, regardless whether the suit has been concluded, a reasonable fee, which you agree shall be valued at not less than \$225 per attorney hour expended on your behalf, together with interest thereon on each month's hours at 12% per annum from the day of rendition of services. Should James D. Gassenheimer, P.A., withdraw as set forth in paragraph 8(d), it shall be entitled to receive only fees and costs billed or incurred through date of order permitting withdrawal.

7) No Prediction or Guarantee of Success; Client's Right to Discontinue. You understand that James D. Gassenheimer, P.A., has not predicted and cannot predict with certainty either the probability of success in this cause or the amount of costs which will be incurred on your behalf.

8) James D. Gassenheimer, P.A.'s Unqualified Right to Withdraw. You acknowledge that James D. Gassenheimer, P.A., has not yet had an opportunity fully and thoroughly to investigate and study this matter, and agree that James D. Gassenheimer, P.A., retains the right to withdraw as counsel in this cause at any time in James D. Gassenheimer,

P.A.'s sole discretion if any of the following occur:

- a) If you fail to make payments required under this agreement when they are due;
- b) If you have misrepresented or have failed to discuss material facts with James D. Gassenheimer, P.A., including those facts set forth in paragraph 11 of this engagement agreement;
- c) If you fail to follow James D. Gassenheimer, P.A.'s advice in these proceedings;
- d) If the prosecution of this action on your behalf appears to James D. Gassenheimer, P.A., lack merit or to be likely to require an expenditure of more than a reasonable amount of attorneys' time compared to the probable recovery involved.

If any of these events occur, you hereby consent to James D. Gassenheimer, P.A.'s withdrawal and further agree to execute any documents James D. Gassenheimer, P.A., deems necessary to permit James D. Gassenheimer, P.A., to withdraw.

9) Suit Between Attorney and Client; Fees; Indemnity; No Jury Trial. Should James D. Gassenheimer, P.A., sue you to collect any fees or costs you owe, James D. Gassenheimer, P.A., James D. Gassenheimer, P.A., shall be entitled to recover the costs and expenses of suit, including reasonable attorneys' fees at trial and/or appellate levels, and in collecting any judgment that may be entered against you. Should any lawsuit be brought which in any way arises out of our relationship as attorney and client, whether brought by you or by a third party, if James D. Gassenheimer, P.A., prevails, James D. Gassenheimer, P.A., James D. Gassenheimer, P.A., shall be entitled to recover from you all costs and expenses necessitated by such litigation, including reasonable attorneys' fees. You waive the right to jury in any litigation between James D. Gassenheimer, P.A., and you.

10) Choice of Forum. You agree that any suit between James D. Gassenheimer, P.A., and you will be filed in state court in Dade County, Florida, and you waive any objection to venue or jurisdiction there.

11) Captions for Convenience Only. You understand that the captions on the paragraphs of this agreement are for convenience only and do not change the meaning and intent of the language of the various paragraphs.

12) Severability. Should any provision above be deemed by any court of competent jurisdiction to be unenforceable, that provision shall be severed from this agreement and James D. Gassenheimer, P.A., shall have the option to enforce the remaining provisions of the contract.

13) Separate Counsel. The terms and conditions contained in this engagement agreement are legally binding upon you and James D. Gassenheimer, P.A., has advised you to seek other counsel for the limited purpose of reviewing the terms of this engagement agreement with you.

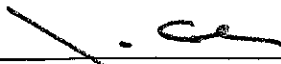
14) Costs Advanced. The fees set forth above do not include costs which may be advanced by this firm or charged to our account on your behalf. These costs may include, but are not limited to recording fees, court reporters, long distance telephone and telefacsimile charges, surveyors and engineers fees, couriers, computer research costs, travel expenses for work done out of Miami, photocopying and other necessary costs. You understand that you responsible for any and all further costs and disbursements expended or made by James D. Gassenheimer, P.A., in the investigation and prosecution of this case. You shall pay any additional costs on a monthly basis and shall be obligated to pay James D. Gassenheimer, P.A., interest at the rate of twelve percent (12%) per annum from date of expenditure on any cost billings not paid within fifteen (15) days.

15) Notices. For all notices required or permitted to be sent pursuant to this engagement agreement, any one of the following methods of delivery shall be sufficient: (i) United States certified mail return receipt requested, which notice shall be conclusively presumed delivered three business days following mailing; (ii) Federal Express or similar commercial overnight service; (iii) by commercial courier with either a receipt for delivery signed by the addressee or a sworn affidavit executed by the courier that delivery was made but the addressee refused to sign or that delivery was refused; or (iv) by telefacsimile, with printed confirmation of receipt of transmission and number of pages received, with an original sent the same day by certified mail as set forth in (i) above. Notice to James D. Gassenheimer, P.A., shall be sent to the address on this letterhead; notice to you shall be sent to the address stated at the top of this engagement agreement.

16) Entire Agreement. This Agreement represents the entire understanding between you and James D. Gassenheimer, P.A., and supersedes, incorporates and merges all prior negotiations, representations and agreements, whether oral or written. All understandings and agreements heretofore had between the parties are merged into this Agreement, which alone fully and completely expresses their agreement. This agreement may be amended only by a written instrument signed by both you and James D. Gassenheimer, P.A., and dated subsequent to the date upon which you executed this engagement agreement, with the same formalities as herein appear.

This engagement agreement is terminable by either party at any time. If the terms and conditions of engagement contained in this agreement are acceptable to you, please execute the enclosed copy of this letter and return it to us.

JAMES D. GASSENHEIMER, P.A.


By: James D. Gassenheimer

Agreed and accepted this 1st day of May, 2007.

M.A.M.C., Inc., a Florida Corporation

By: 

Type Name: Alan L. Goldberg
Title: Chief Restructuring Officer

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

PAID
CHK-2303

Date: June 5, 2007

Needed By: June 2007

Client Name: MAMC vs. Southchase Commerce Center

Matter No.: 400-008

Make Check Payable To:

Date Expense Incurred: May 19, 2007
(and/or to incur):

Individual Incurring Expense: James D. Gassenheimer

Reason for Expense: Postage for Demand letter to Korshak & Associates

Location of Expense: Miracle Mile Postal Store
Miami, FL 33134

TOTAL: \$5.38

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM


Requested By: Vanessa Alvarez 

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney


Accounting


JDG

Billable

☒

Non-Billable

☐

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 11, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.

Date Expense Incurred: July 6, 2007
(and/or to Incur):

Individual Incurring Expense: James D. Gassenheimer

PAID

Reason for Expense: Process Service fee to be served upon: James Antonucci

Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$59.00
Invoice No.: 5428-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez 

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney


Accounting


JDG

Billable ☒

Non-Billable ☐

INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: JAMES D. GASSENHEIMER, ESQ.

INVOICE No.: 5428-07

JUL 6, 2007

CASE NO.: 07-CA-5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CENTER, LLC., ET, AL

1) JAMES ANTONUCCI

(ORANGE)

\$59.00

WHEN HELD TO LIGHT, IF NO WATERMARKS ARE NOT PRESENT, DO NOT CASH. SEE BACK FOR ADDITIONAL SECURITY FEATURES.

JAMES D. GASSENHEIMER PA
(305) 444-6800
3250 MARLYN ST STE 307
MIAMI, FL 33133

COCONUT GROVE BANK
MAIN OFFICE
COCONUT GROVE, FLORIDA 33133

2389
63-460/880
01

10/17/2007

PAY TO THE ORDER OF T.C. Mann, Inc.

\$ 118.00

One Hundred Eighteen and 00/100

DOLLARS

1001 N. America Way
Suite 107
Miami, FL 33132

⑈002389⑈ ⑆066004600⑆ 0184738906⑈

T.C. Mann, Inc.

10/17/2007

2389

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
7/6/2007	Bill	5428-07	59.00	59.00		59.00
7/9/2007	Bill	5542-07	59.00	59.00		59.00
				Check Amount		118.00

Coconut Grove Bank

118.00

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 11, 2007

Needed By: July 2007

Client Name: MAMC v. Southchase Commerce Center

Matter No.: 400-008

Make Check Payable To: T.C. Mann, Inc.

Date Expense Incurred: July 9, 2007
(and/or to Incur):

Individual Incurring Expense: James D. Gassenheimer

PAID

Reason for Expense: Process Service fee to be served upon: Gesenia Romero

Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$59.00

Invoice No.: 5542-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By:

Vanessa Alvarez 

Deliver To:

Josie Pereira

Please Mail To:

Approval:

Attorney



Accounting



JDG

Billable



Non-Billable



INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: JAMES D. GASSENHEIMER, ESQ.

INVOICE No.: 5542-07

JUL 9, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) GESENIA ROMERO

(ORLANDO) \$59.00

WHEN HELD TO LIGHT, IF C

LAR WATERMARKS ARE NOT PRESENT, DO NOT CASH. SEE BACK FOR

TIONAL SECURITY FEATURES

JAMES D. GASSENHEIMER-PA

(305) 444-6800

3250 MARY ST STE 307
MIAMI, FL 33133

COCONUT GROVE BANK
MAIN OFFICE
COCONUT GROVE, FLORIDA 33133

2389

63-460/860
01

10/17/2007

PAY TO THE ORDER OF T.C. Mann, Inc.

\$ 118.00

One Hundred Eighteen and 00/100

DOLLARS

1001 N. America Way
Suite 107
Miami, FL 33132

[Signature]

⑈002389⑈ ⑆066004600⑆ 0184738906⑈

T.C. Mann, Inc.

10/17/2007

2389

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
7/6/2007	Bill	5428-07	59.00	59.00		59.00
7/9/2007	Bill	5542-07	59.00	59.00		59.00
				Check Amount		118.00

Coconut Grove Bank

118.00

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 5, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: June 27, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon:
Vantage Southchase, LLC
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$30.00
Invoice No.: 4987-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney



Accounting

PAID
6251
9/19/07



JDC

Billable ☒

Non-Billable ☐

INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: RAYMIE E. WALSH, ESQ.

INVOICE No.: 4987-07

JUN 27, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) VANTAGE SOUTHCHASE, LLC

\$30.00

6/28/07
RECEIVED

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 5, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: July 2, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon:
Omar Botero
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$30.00
Invoice No.: 5289-07

PAID
8257D
9/19/07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez 

Deliver To: Josie Pereira

Please Mail To:

Approval: 

Attorney

Accounting

JDG

Billable ☒

Non-Billable ☐

INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: RAYMIE E. WALSH, ESQ.

INVOICE No.: 5289-07

JUL 02, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) OMAR BOTERO

\$30.00

WHEN HELD TO LIGHT, IF CIP-AR WATERMARKS ARE NOT PRESENT, DO NOT CASH. SEE BACK FOR ADDITIONAL SECURITY FEATURES

JAMES D. GASSENHEIMER PA

(305) 444-6300

3250 MARY ST STE 307

MIAMI, FL 33133

COCONUT GROVE BANK
MAIN OFFICE
COCONUT GROVE, FLORIDA 33133

2259

63-460/660

01

9/19/2007

PAY TO THE
ORDER OF T.C. Mann, Inc.

\$ 60.00

Sixty and 00/100

DOLLARS

1001 N. America Way

Suite 107

Miami, FL 33132

⑈002259⑈ ⑆066004600⑆ 0184238906⑈

T.C. Mann, Inc.

9/19/2007

2259

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
6/27/2007	Bill	4987-07	30.00	30.00		30.00
7/2/2007	Bill	5289-07	30.00	30.00		30.00
				Check Amount		60.00

Coconut Grove Bank

60.00

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 10, 2007

Needed By: ASAP

Client Name: MAMC vs. Southchase Commerce Center

Matter No.: 400-008

Make Check Payable To: Volusia County Sheriff's Office

Date Expense Incurred: July 11, 2007
(and/or to Incur):

Individual Incurring Expense: James D. Gassenheimer, Esq.

Reason for Expense: Issuance & Service of Process upon Def., James Antonucci

Location of Expense: Volusia County Sheriff's Office
P.O. Box 569
Deland, FL 32721

TOTAL: \$20.00

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: LP for Raymie E. Walsh, Esq./James D. Gassenheimer, Esq. 

Deliver To: Lourdes Ponce

Please Mail To:

Approval:

Attorney

Accounting



JDG

Billable ☒

Non-Billable ☐

Josie Pereira

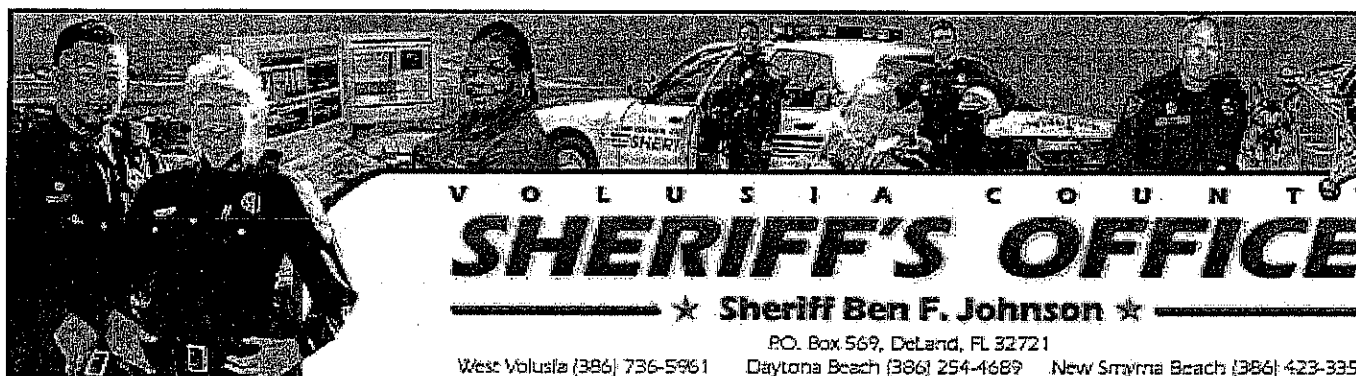
To: Lourdes Ponce

Subject: Regarding: MAMC v. Southchase Commerce Center (File #: 400-008)

Caseld: 204

oCaseld: 204

LOURDES, the problem was (TC Mann Explained) that there are counties in Florida that will not accept private service of process unless they have a Motion & Order. Deland belong to Volusia which happens to be one of those counties. Just do a check request for \$20.00 to Volusia County Sheriff and submit attached Summ/Comp. for service upon James Antonucci, personally, to the below PO box with a letter and the check. You already have the necessary copies:
JOSIE



(386) 736-5961

7/10/2007



*Turned
by [unclear] 7/9/07*

Send to

Sheriff

T. Chan

[Signature]

*Not a
[unclear]*

Gassenheimer

JOSIE PEREIRA, Legal Assistant

James D. Gassenheimer, Esq.

THE GASSENHEIMER LAW FIRM

3250 Mary Street, Suite 307

Coconut Grove, FL 33133

Tel: (305)938-0075 (Ext. 113)

Fax: (305)777-8814

E-Mail: jp@gassenheimerlaw.com

WHEN HELD TO LIGHT, IF CIRCULAR WATERMARKS ARE NOT PRESENT, DO NOT CASH. SEE BACK FOR ADDITIONAL SECURITY FEATURES.

JAMES D. GASSENHEIMER PA

(305) 444-6300

3250 MARY ST STE 307
MIAMI, FL 33133

COCONUT GROVE BANK
MAIL BOX
COCONUT GROVE, FLORIDA 33133

2034

63460/660
01

7/13/2007

PAY TO THE ORDER OF valusia County Sherff's office

\$**20.00

Twenty and 00/100

DOLLARS

valusia County Sherff's office

⑈002034⑈ ⑆066004600⑆ 0184738906⑈

valusia County Sherff's office

Service fee on James Antonucci

7/13/2007

2034

20.00

Coconut Grove Bank

20.00

valusia County Sherff's office

Service fee on James Antonucci

7/13/2007



2034

20.00

Coconut Grove Bank

20.00

Invoice Date 05/23/2007	Invoice Number 07CA0058690	Invoice Description SOUTHCHASE COMMERCE CENTER LLC	Net Invoice Amount 35.50
<i>MAMC v SOUTHCHASE</i> <i>File # 400-008</i>			
Vendor No 835382	Vendor Name JAME D GASSENHEIMER PA	Check No 09511338	Check Amount 35.50

 <p>Orange County Clerk of Courts FINANCIAL SERVICES DIVISION 425 N Orange Avenue, Room 260 Orlando, FL 32801 MASTER DEPOSITORY</p>	Vendor Number 835382	Check Date 06/06/2007	Check Number 09511338	Check Amount 35.50
	VOID AFTER 180 DAYS			
Pay Thirty Five DOLLARS and 50 cents ***** To The Order Of JAME D GASSENHEIMER PA 3250 MARY ST STE 307 MIAMI, FL 33138-0000				
BANK OF AMERICA		 Authorized Signature		

⑈09511338⑈ ⑆063000047⑆3068980855⑈

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

FILE
IN
CLIENT
FILE
CA

Date: May 31, 2007

Needed By: June 2007

Client Name: MAMC vs. Southchase Commerce Center

Matter No.: 400-008

Make Check Payable To: Orange County Clerk of Civil Division (Paid Check #1937)

Date Expense Incurred: May 18, 2007
(and/or to Incur):

Individual Incurring Expense: James D. Gassenheimer

Reason for Expense: Filing Complaint

Location of Expense: Orange County Clerk of Civil Division

TOTAL: \$290.50

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney

Accounting

JDG

Billable

☒

Non-Billable

☐

MAMC v. Southchase

RE: Filing Complaint; NOLP.

*paid
ck# 1937
5/18/07*

Official Receipt

LYDIA GARDNER

ORANGE CTY CLERK OF
CIRCUIT CIVIL DIVI

MAY 23, 2007

03:26 P.M.

Receipt No. 00409156

Check/Acct# 1937

pgonza Register Loc 63

JDG

2007-CA-005869-0

MUNIC CD

PARCEL/PET:

CASE NM: M A M C INC -V- SOUTH
CHASE COMMERCE CE

\$290.50

CHECK	Rec.	\$290.50
Change		\$0.00

Fee Type	Amount
Art V state DOR F	\$50.00
DOCKET FEE - CIRC	\$195.00
Art V MED/ARB TF	\$1.00
Art V Court Opera	\$5.00
COURT ED TF - CIR	\$4.00
OVERPAYMENT > \$5-	\$35.50

Total Applied \$290.50

Balance Due \$0.00

Case Status :

Case Status Date: 04-18-2007

THE JAMES D. GASSENHEIMER, LAW FIRM

LITIGATION FILE OPENING FORM - FILE #400-008

Name of Client: M.A.M.C., Inc.

Address of Client: The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133
Tel: 305.341.0600
Fax: 305.358.5160
Email: dberman@thebermangroup.com

Copies to: ~~Mitch Morgan~~
Hal Gassenheimer
Alan Goldberg
Dana Berman

Correspondence Re: MAMC, Inc. loan to SOUTHCHASE COMMERCE CENTER

Internal File Name: MAMC v. Southchase Commerce Center
(Foreclosure)

Opposing Counsel: (N/A) AT TIME OF OPENING FILE

Case Name: MAMC, Inc, v. Southchase Commerce Center
Case No.:
Judge:
Court:

Attorney: J. Gassenheimer (JDG)

Associate: Raymie Walsh (REW)

Paralegal: Lissette Merida (LM)

cc: Accounting
Chris



✓
C
tot 5/1/07

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

October 5, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for September 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of September 2007 and past due invoices in the following matters.

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008)	
Invoice #1674 dated October 5, 2007	\$ 104.50
Outstanding Invoices:	
Invoice #1270 dated May 3, 2007	\$ 723.50
Invoice #1330 dated June 11, 2007	\$ 5,563.00
Invoice #1427 dated July 10, 2007	\$ 1,093.06
Invoice #1479 dated August 3, 2007	\$ 2,454.14
Invoice #1574 dated September 13, 2007	\$ 1,326.00

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

POSTED
PAID

10/15/07

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

501 Contentental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Berman Mortgage Corporation

Friday, October 05, 2007

File # 400-008

Invoice # 1674

Re: MAMC vs. Southchase Commerce
Center

Professional Services

			<u>Hours</u>	<u>Amount</u>
09/19/2007	LM	Research better address for FGF Real Properties Investments	0.50	\$55.00
09/21/2007	REW	Contact judicial assistant to identify date of hearing; contact opposing counsel to reach agreement	0.30	\$49.50
For professional services rendered			0.80	\$104.50

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
LM	0.50	110.00	\$55.00
REW	0.30	165.00	\$49.50

Total amount of this bill

\$104.50

Balance due

\$104.50

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

September 14, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for August 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of August 2007 and *past due* invoices in the following matters:

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008) Invoice #1574 dated September 13, 2007	\$ 1,326.00
Outstanding Invoices:	
Invoice #1270 dated May 3, 2007	\$ 723.50
Invoice #1330 dated June 11, 2007	\$ 5,563.00
Invoice #1427 dated July 10, 2007	\$ 1,093.06
Invoice #1479 dated August 3, 2007	\$ 2,454.14

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

POSTED
9/24/07

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

501 Contentental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Berman Mortgage Corporation

Thursday, September 13, 2007

File # 400-008

Invoice # 1574

Re: MAMC vs. Southchase Commerce
Center

Professional Services

			<u>Hours</u>	<u>Amount</u>
08/03/2007	REW	Contact B. Mark regarding foreclosure	0.10	\$16.50
08/07/2007	JDG	Telephone call from opposing counsel	0.10	\$22.50
08/09/2007	REW	Contact B. Mark, counsel for junior lien holder	0.10	\$16.50
	REW	Review answer and affirmative defense from vantage; research rules of civil procedure and Florida Law on appropriateness of certain ambiguous issues raised as defenses	1.10	\$181.50
	REW	Review answer and affirmative defense from personal guarantor	0.60	\$99.00
08/28/2007	REW	Review title search in connection with purported lien holder	0.50	\$82.50
	REW	Contact D. Rose, counsel for junior lien holder	0.10	\$16.50

	REW	Contact opposing counsel's in attempt to reach agreement on leave	0.30	\$49.50
	REW	Prepare motion for leave to amend complaint	0.70	\$115.50
	REW	Prepare amended complaint to add junior lien holder South Florida Medical and Realty and Investment II, LLC	1.10	\$181.50
	REW	Compile loan documents as exhibits to complaint	0.70	\$115.50
08/29/2007	REW	Review second position mortgage documents	0.50	\$82.50
	REW	Prepare motion for leave to amend	0.70	\$115.50
	REW	Prepare amended complaint	0.80	\$132.00
	REW	Review defendants' answer filed on August 12th in preparation to identify any allegations that are refuted or challenged in preparation for filing amended complaint	0.60	\$99.00
For professional services rendered			8.00	\$1,326.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JDG	0.10	225.00	\$22.50
REW	7.90	165.00	\$1,303.50

Total amount of this bill

\$1,326.00

Balance due

\$1,326.00

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

August 3, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for July 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of July 2007 and past due invoices in the following matters.

Case Name

MAMC v. Southchase Commerce Center (400-008)
Invoice #1479 dated August 3, 2007

Balance Due

\$ 2,454.14

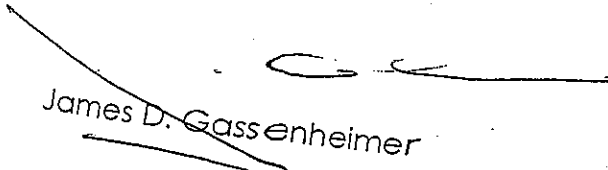
Outstanding Invoices:

Invoice #1270 dated May 3, 2007
Invoice #1330 dated June 11, 2007
Invoice #1427 dated July 10, 2007

\$ 723.50
\$ 5,563.00
\$ 1,093.06

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

August 3, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for July 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of July 2007 and past due invoices in the following matters.

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008)	
Invoice #1479 dated August 3, 2007	\$ 2,454.14
Outstanding Invoices:	
Invoice #1270 dated May 3, 2007	\$ 723.50
Invoice #1330 dated June 11, 2007	\$ 5,563.00
Invoice #1427 dated July 10, 2007	\$ 1,093.06

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

POSTED
8/15/07

James D. Gassenheimer, P.A.

3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

501 Contentental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Berman Mortgage Corporation

Friday, August 03, 2007

File # 400-008

Invoice # 1479

Re: MAMC vs. Southchase Commerce
Center

Professional Services

			<u>Hours</u>	<u>Amount</u>
07/03/2007	REW	Prepare notice of dropping party	0.50	\$82.50
	REW	Contact T.C. Mann to determine status of summons	0.20	\$33.00
07/16/2007	LM	Research division of corporation to obtain update on Southchase Commerce Center	0.50	\$55.00
	LM	Research and autotrack better address for J. Antonucci	1.50	\$165.00
07/18/2007	JDG	Conference with A. Goldberg regarding status	0.40	\$90.00
	REW	Review docket and recent pleadings to determine whether defendants' filed answer	0.40	\$66.00
	REW	Prepare motion for entry of default against Southchase	1.00	\$165.00
	REW	Prepare proposed order as to Southchase	0.70	\$115.50

	REW	Finalize alias summons and cover letter to clerk to issue new summons in light of inability to locate J. Antonucci at previously provided address	0.50	\$82.50
	REW	Prepare proposed order as to Southchase	0.70	\$115.50
	REW	Prepare motion for entry of default against Vantage	1.00	\$165.00
	REW	Prepare proposed order as to Vantage	0.70	\$115.50
07/19/2007	REW	Letter to J. Carello enclosing and describing official dropping of party	0.30	\$49.50
	REW	Prepare motion for entry of default against J. Antonucci	1.10	\$181.50
	REW	Prepare proposed default judgment against J. Antonucci	0.80	\$132.00
07/23/2007	REW	Review FGF Real Properties motion for enlargement of time to respond to complaint	0.30	\$49.50
	REW	Discussion with counsel for FGF in attempt to reach agreement on need for additional time	0.50	\$82.50
	REW	Prepare agreed order on motion for enlargement of time	1.00	\$165.00
	REW	Advise client of tentative offer by FGF to buy mortgage	0.30	\$49.50
	REW	Prepare letter to judge regarding agreed order	0.60	\$99.00
	REW	Prepare letter to FGF counsel regarding proposal confirmation and agreed order	0.60	\$99.00

For professional services rendered

13.60 \$2,158.00

Timekeeper Summary

Name	Hours	Rate	Amount
IDG	0.40	225.00	\$90.00
LM	2.00	110.00	\$220.00
REW	11.20	165.00	\$1,848.00

Additional Charges

	Amount
7/6/2007 FedEx (All 3)	\$75.05
7/10/2007 Process Service fee to be served upon: Vantage Southchase, LLC	\$30.00
Process Service fee to be served upon: Omar Botero	\$30.00
7/11/2007 Issuance and Service of Process upon Defendant James Antonucci	\$20.00
7/13/2007 Process Service fee to be served upon: Gesenia Romero	\$59.00
Process Service fee to be served upon: James Antonucci	\$59.00
7/31/2007 FedEx	\$23.09
Total costs	\$296.14
Total amount of this bill	\$2,454.14
Balance due	\$2,454.14

05/24/07	FEDEX #791303327863 MIAMI MAMG v. Southchas 33133 TO: The Gassenheimer Law Firm FL FROM: Clerk, Circuit Court 32801 001 PRIORITY PAK 2LB AWB791303327863 YOUR FEDEX CUSTOM DISCOUNT IS \$2.42 ROC No. 1303327863	FL	400-008	24.18
06/04/07	FEDEX #798187962668 MIAMI MAMG v. Southchas 32801 TO: Orange County Courthouse FL FROM: Paynie E. Walsh, Esq. 33133 001 PRIORITY LTR 3LB AWB798187962668 YOUR FEDEX CUSTOM DISCOUNT IS \$2.56 ROC No. 8187962668	FL	400-008	26.15
06/19/07	FEDEX #792997180660 MIAMI MAMG v. Southchas 33133 TO: The Gassenheimer Law Firm FL FROM: Clerk, Circuit Court 32801 001 PRIORITY LTR 2LB AWB792997180660 YOUR FEDEX CUSTOM DISCOUNT IS \$2.42 ROC No. 2997180660	FL	400-008	24.72

TOTAL \$ 75.05

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 5, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: July 2, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon:
Omar Botero
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$30.00
Invoice No.: 5289-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez
Deliver To: Josie Pereira
Please Mail To:
Approval:

Attorney

Accounting

JDG

Billable

☒

Non-Billable

☐

INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: RAYMIE E. WALSH, ESQ.

INVOICE No.: 5289-07

JUL 02, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) OMAR BOTERO

\$30.00

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 5, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: June 27, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon:
Vantage Southchase, LLC
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$30.00
Invoice No.: 4987-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney

Accounting


JDC

Billable



Non-Billable



INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: RAYMIE E. WALSH, ESQ.

INVOICE No.: 4987-07

JUN 27, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) VANTAGE SOUTHCHASE, LLC

\$30.00

6/28/07
FILED

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 10, 2007
Needed By: ASAP
Client Name: MAMC vs. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: Volusia County Sheriff's Office
Date Expense Incurred: July 11, 2007
(and/or to incur):
Individual Incurring Expense: James D. Gassenheimer, Esq.
Reason for Expense: Issuance & Service of Process upon Def., James Antonucci
Location of Expense: Volusia County Sheriff's Office
P.O. Box 569
Deland, FL 32721

TOTAL: \$20.00

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: LP for Raymie E. Walsh, Esq./James D. Gassenheimer, Esq.
Deliver To: Lourdes Ponce
Please Mail To:

Approval:

Attorney

Accounting

JDG

Billable

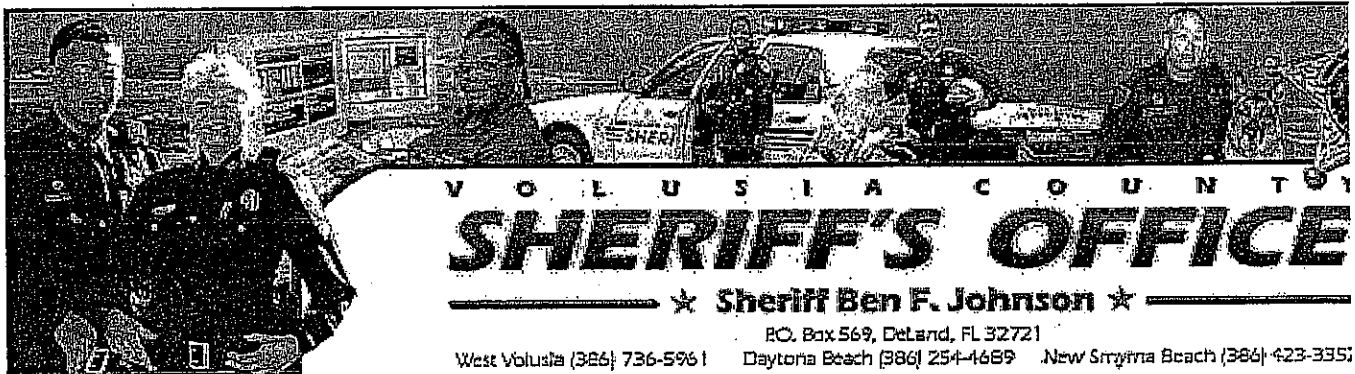


Non-Billable



Josie Pereira**To:** Lourdes Ponce**Subject:** Regarding: MAMC v. Southchase Commerce Center (File #: 400-008)**Caseld:** 204**oCaseld:** 204

LOURDES, the problem was (TC Mann Explained) that there are counties in Florida that will not accept private service of process unless they have a Motion & Order. Deland belong to Volusia which happens to be one of those counties. Just do a check request for \$20.00 to Volusia County Sheriff and submit attached Summ/Comp. for service upon James Antonucci, personally, to the below PO box with a letter and the check. You already have the necessary copies:
JOSIE



(386) 736-5961

7/10/2007

CRIME STOPPERS
Anonymous Tip Line:
(888) 277-TIPS

**VOLUSIA COUNTY'S
MOST WANTED**

**SOLVED
CASES**

**DEPARTMENT
NEWSLETTER**

NEIGHBORHOOD WATCH

E-MAIL US

*Turned
in 11/10/07*

Send to

Sheriff

T. C. Mann

[Signature]

*Not a
Order*

G. ADAMS

JOSIE PEREIRA, Legal Assistant
James D. Gassenheimer, Esq.
THE GASSENHEIMER LAW FIRM
3250 Mary Street, Suite 307
Coconut Grove, FL 33133
Tel: (305)938-0075 (Ext. 113)
Fax: (305)777-8814
E-Mail: jp@gassenheimerlaw.com

THE GASSENHEIMER LAW FIRM

James D. Gassenheimer
Board Certified Civil Trial Lawyer

Andrew D. Craven
Kevin D. Franz
Monica F. Klein
Shana K. Rahavy
Raymie E. Walsh

DRAFT

July 10, 2007

VIA FEDEX OVERNIGHT

VOLUSIA COUNTY SHERIFF'S OFFICE

% Civil Process Dept.

Post Office Box 569

Deland, Florida 32721

**RE: Filing of M.A.M.C. Inc., et al. vs. Southchase Commerce Center, et al.,
Lawsuit and Recording of Notice of Lis Pendens**

Dear Deputy:

Enclosed herewith please find an original and two copies of a Summons for Defendant, James Antonucci, as an Individual Guarantor; along with the Amended Complaint to be served upon said Defendant, James Antonucci. Additionally, we have enclosed our check (#____) in the amount of \$20.00, for the service of process.

Accordingly, please return a copy of the summons with the affidavit of return of service of process in the enclosed self-addressed, stamped envelope provided for your convenience.

Should you have any questions or comments, please do not hesitate to contact our office immediately in order to avoid delay.

Thank you in advance for your prompt attention and cooperation in this matter.

Sincerely,

James D. Gassenheimer

JDG/lmp

Enclosures

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 11, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: July 6, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon: James Antonucci
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$59.00
Invoice No.: 5428-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez
Deliver To: Josie Pereira
Please Mail To:
Approval:

Attorney

Accounting

JDC

Billable



Non-Billable



INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: JAMES D. GASSENHEIMER, ESQ.

INVOICE No.: 5428-07

JUL 6, 2007

CASE NO.: 07-CA-5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CENTER, LLC., ET, AL

1) JAMES ANTONUCCI

(ORANGE)

\$59.00

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: July 11, 2007
Needed By: July 2007
Client Name: MAMC v. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To: T.C. Mann, Inc.
Date Expense Incurred: July 9, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Process Service fee to be served upon: Gesenia Romero
Location of Expense: T.C. Mann, Inc.
1001 N America Way, Suite 107
Miami, FL 33132-2029

TOTAL: \$59.00
Invoice No.: 5542-07

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez
Deliver To: Josie Pereira
Please Mail To:
Approval:

Attorney

Accounting

JDG

Billable



Non-Billable



INVOICE

T. C. MANN, INC.

1001 N. AMERICA WAY, SUITE 107

MIAMI, FLORIDA 33132-2029

TELEPHONE: (305) 577-0220

Fed. Tax I.D. 59-2618358

BILL TO: THE GASSENHEIMER LAW FIRM

ATTORNEY: JAMES D. GASSENHEIMER, ESQ.

INVOICE No.: 5542-07

JUL 9, 2007

CASE NO.: 07 CA 5869

M.A.M.C., INC., ET, AL VS:
SOUTHCHASE COMMERCE CTR, LLC, ET, AL

1) GESENIA ROMERO

(ORLANDO) \$59.00



FedEx Billing Online

400-008

FedEx Billing Online
Express Tracking ID Detail

Tracking ID Summary

Tracking ID Number : 791347525394
Account Number : 3419-0990-2
Total Billed : 23.09
Status : Paid CC

Shipment refused by recipient.
FedEx has audited this shipment
1st attempt Jul 20, 2007 at 09:46
Distance Based Pricing, Zone 3
Fuel Surcharge - FedEx has applied
The package weight exceeds the

Sender Information

Raymie E. Walsh, Esq.
The Gassenheimer Law Firm

307 Continental Plaza
COCONUT GROVE FL 33133
US

Recipient Information

Default Clerk Circuit/Civil Di
Orange County Courthouse
425 North Orange Avenue

ORLANDO, FL 32801
US

Original Reference

Customer Reference# MAMC v. Southchase
Department#
RMA#
Reference #2
Reference #3

Shipment Details

Shipment Date 07/19/2007
Payment Type Shipper
Service Type FedEx Priority Overnight
Region Code 03
Package Type FedEx Pak
Pieces 1
Rated Weight 1.0 lbs
Bundle ID 0
Meter No 9763855
Declared Value 0.00

Charges

Transportation Charge 22.60
Fuel Surcharge 2.75
Weekday Delivery 0.00
Automation Bonus Discount -2.26
Total Charges USD \$ 23.09

Proof of Delivery

Delivery Date 07/20/2007 16:21
Service Area Code A1
Signed By T.BUFFORD

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

July 10, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for June 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of June 2007 and *past due* invoices in the following matters.

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008) Invoice #1427 dated July 10, 2007	\$ 1,093.06
Outstanding Invoice: Invoice #1270 dated May 3, 2007	\$ 723.50
Invoice #1330 dated June 11, 2007	\$ 5,563.00

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

POSTED
7/25/07

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

c/o The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Berman Mortgage Corporation

Tuesday, July 10, 2007

File # 400-008

Invoice # 1427

Re: MAMC vs. Southchase Commerce
Center

Professional Services

			<u>Hours</u>	<u>Amount</u>
06/01/2007	JDG	Analyze strategy regarding service and estoppel issue	1.00	\$225.00
	JDG	Various emails reporting to client	0.50	\$112.50
	REW	Finalize amended complaint	0.60	\$99.00
	REW	Correspondence with A. Delaney on payoff and service issues	0.40	\$66.00
06/08/2007	REW	Contact judicial assistant in Seminole County; discussion on status of amended complaint and summons	0.30	\$49.50
	REW	Contact opposing counsel in attempt to reach agreement	0.10	\$16.50
06/13/2007	REW	Discussion with Rueben on named defendants' and Carello's assignment	0.30	\$49.50

	REW	Review letter from Sexton Reality advising of interest in property	0.30	\$49.50
	REW	Contact potential buyers of mortgage	0.40	\$66.00
06/19/2007	REW	Telephone discussion with P. Sexton of Sexton Advisors regarding potential buy out of note	0.50	\$82.50
	REW	Letter to client advising of offer and options	0.30	\$49.50
	REW	Follow up letter to P. Sexton confirming conversation	0.50	\$82.50
06/25/2007	REW	Discussion with process server on summons	0.40	\$66.00
	REW	Discussion with P. Sexton on potential assignment offer	0.30	\$49.50

For professional services rendered

5.90 \$1,063.50

Timekeeper Summary

Name	Hours	Rate	Amount
JDG	1.50	225.00	\$337.50
REW	4.40	165.00	\$726.00

Additional Charges

	Amount
6/15/2007 Postage for Demand letter to Korshak & Associates	\$5.38
6/21/2007 FedEx	\$24.18
Total costs	\$29.56
Total amount of this bill	\$1,093.06
Balance due	\$1,093.06

THE GASSENHEIMER LAW FIRM

CHECK REQUEST FORM

Date: June 5, 2007
Needed By: June 2007
Client Name: MAMC vs. Southchase Commerce Center
Matter No.: 400-008
Make Check Payable To:
Date Expense Incurred: May 19, 2007
(and/or to Incur):
Individual Incurring Expense: James D. Gassenheimer
Reason for Expense: Postage for Demand letter to Korshak & Associates
Location of Expense: Miracle Mile Postal Store
Miami, FL 33134

TOTAL: \$5.38

ALL RECEIPTS MUST BE ATTACHED TO THIS FORM

Requested By: Vanessa Alvarez

Deliver To: Josie Pereira

Please Mail To:

Approval:

Attorney

Accounting



JDG

Billable



Non-Billable



*Revised
(2nd K)
HANC v. Southchase
Demand Ltr to Korshak & Assoc.*

MIRACLE MILE POSTAL STORE
MIAMI, Florida
331349997

1158540188 -0096
05/19/2007 (800)275-8777 11:41:04 AM

Sales Receipt

Product Description	Sale Qty	Unit Price	Final Price
---------------------	----------	------------	-------------

ORLANDO FL 32819 Zone-3			\$0.58
-------------------------	--	--	--------

First-Class Letter			
--------------------	--	--	--

1.30 oz.			
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Return Rcpt (Green Card)			\$2.15
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Certified			\$2.65
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Label #:	70060810000473557874		
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Customer Postage			
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Subtotal:			<u>\$5.38</u>
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			<u>\$0.00</u>
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Issue PVI:			\$0.00
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Total:			<u>\$0.00</u>
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Paid by:

Order stamps at USPS.com/shop or call
1-800-Stamp24. Go to USPS.com/clicknship
to print shipping labels with postage.
For other information call 1-800-ASK-USPS.

Bill #: 1000402042286
Clerk: 16

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

Customer Copy

05/18/07 FEDEX #792989660722 MIAMI FL 24-18
MAMC v. Southchris 32801
TO: Orange County Courthouse FL
FROM: Raymie E. Walsh, Esq. 33133
001 PRIORITY PAK 2LB AWB792989660722
YOUR FEDEX CUSTOM DISCOUNT IS \$2.42
HOC No: 2989660722

400-008

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

June 11, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for May 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of May 2007 and past due invoice in the following matters.

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008) Invoice #1330 dated June 11, 2007	\$ 5,563.00

Outstanding Invoice:	1270
Invoice Date:	May 3, 2007
Period Covered:	April 2007
Past Due Amount:	\$ 759.00
Less Clerk of Court Refund:	\$ 33.50
Balance Due:	\$ 725.50

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

James D. Gassenheimer, P.A.

3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

c/o The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Monday, June 11, 2007

File # 400-008

Invoice # 1330

Re: MAMC vs. Southchase Commerce
Center

Professional Services

			<u>Hours</u>	<u>Amount</u>
05/01/2007	REW	Edit and finalize demand letter	0.30	\$49.50
	REW	Research Orange County recording and filing requirements	0.40	\$66.00
	REW	Review loan modification terms to determine all proper parties for notification of default	0.70	\$115.50
	REW	Research and identify all derivations of limited liability company designation and registered agent for sufficient notification	0.80	\$132.00
05/03/2007	REW	Review loan documents and discuss simultaneous filing of notice and complaint issues: need for internally consistent loan document language	0.30	\$49.50
05/04/2007	REW	Letter to A. Goldberg updating status	0.20	\$33.00
05/06/2007	REW	Review loan documents, modifications, and business entity formations in preparation for complaint	2.10	\$346.50

	REW	Review loan documents, time, costs, and estoppel; prepare letter to opposing counsel regarding payoff amounts	0.40	\$66.00
05/31/2007	JDG	Review and revise complaint	0.50	\$112.50
	REW	Review and finalize amended complaint	0.30	\$49.50
For professional services rendered			<u>35.40</u>	<u>\$5,272.50</u>

Timekeeper Summary

Name	Hours	Rate	Amount
JDG	2.90	225.00	\$652.50
LM	13.50	110.00	\$1,485.00
REW	19.00	165.00	\$3,135.00

Additional Charges

	Amount
5/31/2007 Filing Complaint	<u>\$290.50</u>
Total costs	<u>\$290.50</u>
Total amount of this bill	<u>\$5,563.00</u>
Balance due	<u>\$5,563.00</u>

MAMC v. Southchase

Pl: Filing Complaint; NOLP.

Paid
ck# 1937
5/18/07

Official Receipt
LYDIA GARDNER

ORANGE CTY CLERK OF
CIRCUIT CIVIL DIVI

MAY 23, 2007 03:26 P.M.

Receipt No. 00409156
Check/Acct# 1937
pgonza Register Loc 63

JDG
2007-CA-005869-0

MUNIC CD

PARCEL/PET:
CASE NM: M A M C INC -V- SOUTH
CHASE COMMERCE CE

CHECK	Rec.	\$290.50
Change		\$0.00

Fee Type	Amount
Art V state DOR F	\$50.00
DOCKET FEE - CIRC	\$195.00
Art V MED/ARB TF	\$1.00
Art V Court Opera	\$5.00
COURT ED TF - CIR	\$4.00
OVERPAYMENT > \$5-	\$35.50

Total Applied \$290.50

Balance Due \$0.00

Case Status :

Case Status Date: 04-18-2007

James D. Gassenheimer, P.A.
3250 Mary Street, Suite 307
Coconut Grove, FL 33133

May 9, 2007

VIA HAND DELIVERY

Hal Gassenheimer, CFO
The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Re: James D. Gassenheimer, P.A. Invoices for April 2007
MAMC v. Southchase Commerce Center (400-008)

Dear Hal:

Enclosed please find invoices for rendered services for the month of April 2007 in the following matters.

Case Name	Balance Due
MAMC v. Southchase Commerce Center (400-008) Invoice #1270 dated May 3, 2007	\$ 759.00

We ask that these invoices be placed in line for payment.

Sincerely,


James D. Gassenheimer

JDG/va
Enclosures

James D. Gassenheimer, P.A.

3250 Mary Street, Suite 307
Coconut Grove, FL 33133

Invoice submitted to:

c/o The Berman Group
501 Continental Plaza
3250 Mary Street
Coconut Grove, FL 33133

Thursday, May 03, 2007

Invoice # 1270

File # 400-008

Re: **MAMG v. Southchase Commerce Center**

Professional Services

			<u>Hours</u>	<u>Amount</u>
04/30/2007	REW	Review loan documents in preparation for filing demand letter to determine sufficient notice before accelerating note.	1.80	\$297.00
	REW	Prepare demand letter and notice of default	1.50	\$247.50
	REW	Prepare notice of intent to enforce assignment of rents and leases	1.30	\$214.50
		For professional services rendered	4.60	\$759.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
REW	4.60	165.00	\$759.00

Total amount of this bill

\$759.00

Balance due

\$759.00
