

IN THE THIRD DISTRICT COURT OF APPEAL  
STATE OF FLORIDA

PIERIC JOEL VAUCHER DE LA CROIX,

*Appellant,*

v.

MARTHA CECILIA HERNANDEZ  
QUINTERO,

*Appellee.*

**CASE No. 3D24-0028**

LT No. 19-2661

**APPENDIX TO  
MOTION TO STRIKE  
APPELLEE'S MOTION FOR ATTORNEYS' FEES**

Appellant, Pieric Joel Vaucher de la Croix, by and through his undersigned counsel, hereby files this Appendix in support of his Motion to Strike Appellee's Motion for Attorneys' Fees.

**INDEX**

DATE	ITEM	PAGE
04/08/24	Notice of Appeal of March 11 and April 8, 2024 Fee Orders (Case No. 3D24-0645)	5-8
05/03/24	Order Vacating and Quashing March 11, 2024 Order Granting Petitioner/Wife Martha Cecilia Hernandez Quintero's Motion for Attorney's Fees, Suit Monies and Costs, and April 8, 2024 Order on Respondent/Husband Pieric Vaucher de la Croix's Motion for Reconsideration and/or Rehearing on Wife's Motion for Attorney's Fees, Suit Monies and Costs	9-12
05/04/24	Notice of Voluntary Dismissal of Appeal.	13-15

Respectfully submitted,

Elliot B. Kula  
Florida Bar No. 03794  
W. Aaron Daniel  
Florida Bar No. 99739  
William D. Mueller  
Florida Bar No. 120124  
KULA & ASSOCIATES, P.A.  
11900 Biscayne Blvd., Ste. 310  
Miami, Florida 33181  
Phone: (305) 354-3858  
[eservice@kulalegal.com](mailto:eservice@kulalegal.com)  
[elliott@kulalegal.com](mailto:elliott@kulalegal.com)  
[aaron@kulalegal.com](mailto:aaron@kulalegal.com)  
[william@kulalegal.com](mailto:william@kulalegal.com)  
*Counsel for Appellant*

By: /s/ W. Aaron Daniel  
W. Aaron Daniel

## CERTIFICATE OF SERVICE

I certify that, on July 3, 2024, pursuant to Fla. R. Gen. Prac. & Jud. Admin. 2.516, this Appendix was served via the Florida courts ePortal on:

Raymond J. Rafool, II, Esq.  
Seth J. Rutman, Esq.  
Rafool, LLC  
900 Biscayne Bay Building  
990 Biscayne Blvd., Ste. O-301  
Miami, Florida 33132  
[Service@Rafool.com](mailto:Service@Rafool.com)  
*Counsel for Appellant*

Luis M. Padron, Esq.  
[pleadings@padronlaw.com](mailto:pleadings@padronlaw.com)  
[Impadron@padronlaw.com](mailto:Impadron@padronlaw.com)  
The Padron Law Group, P.L.L.C.  
135 San Lorenzo Ave., Ste. 650  
Coral Gables, Florida 33146  
*Counsel for Appellant*

Melissa J. Jacobs, Esq.  
Coffey Burlington, P.L.  
2601 South Bayshore Dr., Penthouse  
Miami, Florida 33133  
[mjacobs@coffeyburlington.com](mailto:mjacobs@coffeyburlington.com)  
[yvb@coffeyburlington.com](mailto:yvb@coffeyburlington.com)  
[service@coffeyburlington.com](mailto:service@coffeyburlington.com)

Barbara J. Riesberg, Esq.  
Taylor English Duma LLP,  
601 Brickell Key Dr., Ste. 700  
Miami, Florida 33131  
[briesberg@taylorenghish.com](mailto:briesberg@taylorenghish.com)  
[lhahn@taylorenghish.com](mailto:lhahn@taylorenghish.com)  
[hhtilis@taylorenghish.com](mailto:hhtilis@taylorenghish.com)

Gonzalo R. Dorta, Esq.  
Dorta Law  
334 Minorca Ave.  
Coral Gables, Florida 33134  
[grd@dortalaw.com](mailto:grd@dortalaw.com)  
[jgonzalez@dortalaw.com](mailto:jgonzalez@dortalaw.com)  
*Counsel for Appellee*

Anthony Accetta, Esq.  
Law Offices of Anthony Accetta, P.A.  
135 San Lorenzo Ave.,  
Penthouse 820  
Coral Gables, Florida 33146  
[law@anthonyaccetta.com](mailto:law@anthonyaccetta.com)  
[paralegal@anthonyaccetta.com](mailto:paralegal@anthonyaccetta.com)  
*Counsel for Appellee*

Andrew S. Berman, Esq.  
Amber B. Glasper, Esq.  
Young Berman Karpf & Karpf, P.A.  
825 Brickell Bay Dr., Tower III  
Suite 1748  
Miami, Florida 33131  
[amber@ybkklaw.com](mailto:amber@ybkklaw.com)  
[eservice@ybkklaw.com](mailto:eservice@ybkklaw.com)

Tyler A. Mamone, Esq.  
Mamone Villalon  
100 Southeast 2<sup>nd</sup> St., Ste. 2000  
Miami, Florida 33131  
[tyler@mclawpll.com](mailto:tyler@mclawpll.com)  
[ramsey@mvlawpll.com](mailto:ramsey@mvlawpll.com)  
[yetian@mvlawpll.com](mailto:yetian@mvlawpll.com)

Christian C. Kohlsaat, Esq.  
Buchanan Ingersoll & Rooney, PC  
One Biscayne Tower  
2 South Biscayne Blvd., Ste. 1500  
Miami, Florida 33131  
[christian.kohlsaad@bipc.com](mailto:christian.kohlsaad@bipc.com)  
[patricia.delgado@bipc.com](mailto:patricia.delgado@bipc.com)

Jim Montalvo, Esq.  
Montalvo Law, P.A.  
848 Brickell Ave., Ste. 310  
Miami, Florida 33131  
[jim@montalvopa.com](mailto:jim@montalvopa.com)

Lazaro Vazquez, Esq.  
Law Office of Lazaro Vazquez, P.A.  
145 Almeria Ave.  
Coral Gables, Florida 33134  
[lazaro@vazquezpa.com](mailto:lazaro@vazquezpa.com)

By: /s/ W. Aaron Daniel  
W. Aaron Daniel

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

CASE NO. 2019-002661-FC-04  
FAMILY DIVISION

IN RE: THE MARRIAGE OF:

MARTHA CECILIA HERNANDEZ QUINTERO,

*Petitioner/Wife,*

and

PIERIC JOEL VAUCHER DE LA CROIX,

*Respondent/Husband.*

\_\_\_\_\_/

MARTHA CECILIA HERNANDEZ QUINTERO,

*Plaintiff,*

and

PIERIC J. VAUCHER DE LA CROIX  
REVOCABLE QDOT TRUST, *et al.*<sup>1</sup>

*Defendants.*

**NOTICE OF APPEAL**

Notice is hereby given that Respondent/Husband, PIERIC JOEL VAUCHER DE LA CROIX, by and through undersigned counsel, appeals to the Third District

<sup>1</sup> EURIDICE, LLC, a Florida limited liability company, HYPNOS HOLDING, LLC, a Florida limited liability company, NEREUS HOLDING, LLC, a Florida limited liability company, THANATOS, LLC, a Florida limited liability company, ORPHEUS, LLC, a Florida limited liability company, and HIPPOLYTE, LLC, a Florida limited liability company.

Court of Appeal from this Court’s “ORDER GRANTING PETITIONER/WIFE MARTHA CECILIA HERNANDEZ QUINTERO’S MOTION FOR ATTORNEY’S FEES, SUIT MONIES AND COSTS” (hereinafter the “Fee Order”) entered on March 11, 2024, and the “ORDER ON RESPONDENT/HUSBAND PIERIC JOEL VAUCHER DE LA CROIX’S MOTION FOR RECONSIDERATION AND/OR REHEARING ON WIFE’S MOTION FOR ATTORNEY’S FEES, SUIT MONIES AND COSTS [D.E. 1371]” by which the Court maintains its ruling but corrects certain calculations in the amount of fees awarded (hereinafter the “Corrected Fee Order”) entered on April 8, 2024. The Fee Order and the Corrected Fee Order are attached as Exhibit A and Exhibit B, respectively.

The March 11<sup>th</sup> Fee Order and the April 8<sup>th</sup> Corrected Fee Order are tandem non-final orders, each of which is independently appealable pursuant to Florida Rule of Appellate Procedure 9.130(a)(3)(C)(iii)a because it is an order entered in a “family law matter[]” that “determine[]s” “the right to immediate monetary relief.” *Accord, e.g., Sanz v. Saenz*, 366 So. 3d 1173, 1174 (Fla. 3d DCA 2023).

Respectfully submitted,

Raymond J. Rafool  
Florida Bar No. 0897670  
Seth J. Rutman  
Florida Bar No. 125289  
RAFOOL, LLC  
900 Biscayne Bay Building  
990 Biscayne Blvd., Suite O-301  
Miami, Florida 33132  
Telephone: (305) 567-9400  
Facsimile: (305) 567-9401  
[Service@Rafool.com](mailto:Service@Rafool.com)  
*Counsel for Respondent/Husband, Pieric  
Joel Vaucher de la Croix*

By: /s/ **RAYMOND J. RAFOOL**  
RAYMOND J. RAFOOL

Elliot B. Kula  
Florida Bar No. 003794  
KULA & ASSOCIATES, P.A.  
11900 Biscayne Boulevard, Suite 310  
Miami, Florida 33181  
Telephone: (305) 354-3858  
Facsimile: (305) 354-3822  
[eservice@kulalegal.com](mailto:eservice@kulalegal.com)  
[elliott@kulalegal.com](mailto:elliott@kulalegal.com)  
*Limited Appearing Appellate Counsel  
for Respondent/Husband, Pieric Joel  
Vaucher de la Croix*

By: /s/ **ELLIOT B. KULA**  
ELLIOT B. KULA

### CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on **April 8, 2024**, pursuant to Fla. R. Gen. Prac. & Jud. Admin. 2.516, this Notice of Appeal was served via the Florida courts ePortal on counsel of record as follows: **GONZALO R. DORTA, ESQUIRE**, [jgonzalez@dortalaw.com](mailto:jgonzalez@dortalaw.com); [grd@dortalaw.com](mailto:grd@dortalaw.com), Dorta Law, 334 Minorca Avenue, Coral Gables, Florida 33134; **ANTHONY ACCETTA, ESQUIRE**, [law@anthonyaccetta.com](mailto:law@anthonyaccetta.com); [paralegal@anthonyaccetta.com](mailto:paralegal@anthonyaccetta.com), Law Offices of Anthony Accetta, P.A., 135 San Lorenzo Avenue, Penthouse 820, Coral Gables, Florida 33146; **AMBER B. GLASPER, ESQUIRE**, [amber@ybkklaw.com](mailto:amber@ybkklaw.com); [eservice@ybkklaw.com](mailto:eservice@ybkklaw.com), Young Berman Karpf & Karpf, P.A., 825 Brickell Bay

Drive, Tower III, Suite 1748, Miami, Florida 33131; **LAZARO VAZQUEZ, ESQUIRE**, [lazaro@vazquezpa.com](mailto:lazaro@vazquezpa.com), Law Office of Lazaro Vazquez, P.A., 145 Almeria Avenue, Coral Gables, Florida 33134; **LUIS M. PADRON, ESQUIRE**, [pleadings@padronlaw.com](mailto:pleadings@padronlaw.com); [mpadron@padronlaw.com](mailto:mpadron@padronlaw.com), The Padron Law Group, P.L.L.C., 135 San Lorenzo Avenue, Suite 650, Coral Gables, Florida 33146; **MELISSA J. JACOBS, ESQUIRE**, [mjacobs@coffeyburlington.com](mailto:mjacobs@coffeyburlington.com); [yvb@coffeyburlington.com](mailto:yvb@coffeyburlington.com); [service@coffeyburlington.com](mailto:service@coffeyburlington.com), Coffey Burlington, P.L., 2601 South Bayshore Drive, Penthouse, Miami, Florida 33133; **BARBARA J. RIESBERG, ESQUIRE**, [briesberg@taylorenghish.com](mailto:briesberg@taylorenghish.com); [lhahn@taylorenghish.com](mailto:lhahn@taylorenghish.com); [hilis@taylorenghish.com](mailto:hilis@taylorenghish.com), Taylor English Duma LLP, 601 Brickell Key Drive, Suite 700, Miami, Florida 33131; **JIM MONTALVO, ESQUIRE**, [jim@montalvopa.com](mailto:jim@montalvopa.com), Montalvo Law, P.A., 848 Brickell Avenue, Suite 310, Miami, Florida 33131; **TYLER A. MAMONE, ESQUIRE**, [tyler@mclawpll.com](mailto:tyler@mclawpll.com); [ramsey@mvlawpll.com](mailto:ramsey@mvlawpll.com); [yetian@mvlawpll.com](mailto:yetian@mvlawpll.com), Mamone Villalon, 100 Southeast 2<sup>nd</sup> Street, Suite 2000, Miami, Florida 33131; and **CHRISTIAN C. KOHLSAAT, ESQUIRE**, [christian.kohlsaat@bipc.com](mailto:christian.kohlsaat@bipc.com); [patricia.delgado@bipc.com](mailto:patricia.delgado@bipc.com), Buchanan Ingersoll & Rooney, PC, One Biscayne Tower, 2 South Biscayne Boulevard, Suite 1500, Miami, Florida 33131, on this **22nd** day of December, 2023.

/s/ ELLIOT B. KULA  
ELLIOT B. KULA

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL  
CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

CASE NO: 2019-002661-FC-04

SECTION: FC28

JUDGE: Samantha Ruiz Cohen

**Hernandez Quintero, Martha Cecilia**

Petitioner(s)

vs.

**Vaucher De La Croix, Pieric Joel**

Respondent(s)

\_\_\_\_\_ /

**ORDER VACATING AND QUASHING MARCH 11, 2024 ORDER GRANTING  
PETITIONER/WIFE MARTHA CECILIA HERNANDEZ QUINTERO'S MOTION FOR  
ATTORNEY'S FEES, SUIT MONIES AND COSTS, AND APRIL 8, 2024 ORDER ON  
RESPONDENT/HUSBAND PIERIC VAUCHER DE LA CROIX'S MOTION FOR  
RECONSIDERATION AND/OR REHEARING ON WIFE'S MOTION FOR ATTORNEY'S  
FEES, SUIT MONIES AND COSTS**

**THIS CAUSE** came before the Court on the Petitioner/Wife Martha Cecilia Hernandez Quintero and the Respondent/Husband Pieric Joel Vaucher De La Croix's April 30, 2024, Attorneys' Fees, Costs And Suit Money Settlement Agreement that was filed with the Court on the same date, the parties' agreement and the Court is duly advised in the premises.

Accordingly, it is **ORDERED and ADJUDGED** as follows:

1. The Court's March 11, 2024 Order Granting Petitioner/Wife Martha Cecilia Hernandez Quintero's Motion for Attorney's Fees, Suit Monies and Costs, and the Court's April 8, 2024 Order on Respondent/Husband Pieric Vaucher De La Croix's Motion for Reconsideration and/or Rehearing on Wife's Motion for Attorney's Fees, Suit Monies and Costs (together, "Prior Fees Orders") are hereby vacated and quashed and of no further affect ab initio;
2. No party shall utilize any of the findings and holdings in the Prior Fee Orders for any

purpose; and

3. The Court reserves jurisdiction to enforce the intents and purposes of this Order.

**DONE and ORDERED** in Chambers at Miami-Dade County, Florida on this 3rd day of May, 2024.



2019-002661-FC-04 05-03-2024 11:38 PM

Hon. Samantha Ruiz Cohen

**CIRCUIT COURT JUDGE**

Electronically Signed

No Further Judicial Action Required on **THIS MOTION**

CLERK TO **RECLOSE** CASE IF POST JUDGMENT

**Electronically Served:**

Albert G. Caruana, acaruana@coffeyburlington.com  
Albert G. Caruana, service@coffeyburlington.com  
Amber B Glasper, amber@ybkklaw.com  
Amber B Glasper, sandra@ybkklaw.com  
Amber B Glasper, eservice@ybkklaw.com  
Amber B. Glasper, amber@ybkklaw.com  
Amber B. Glasper, eservice@ybkklaw.com  
Amber Glasper, Esquire, eservice@glasperlaw.com  
Anthony Accetta, Esq., law@anthonyaccetta.com  
Anthony Accetta, Esq., yanelly@anthonyaccetta.com  
Anthony Accetta, Esq., paralegal@anthonyaccetta.com  
Anthony Accetta, Esquire, charles@anthonyaccetta.com  
Barbara J. Riesberg, briesberg@taylorenghish.com  
Barbara J. Riesberg, lhahn@taylorenghish.com  
Barbara J. Riesberg, Esquire, htillis@taylorenghish.com  
Christian C. Kohlsaas, Esquire, christian.kohlsaas@bipc.com  
Christian C. Kohlsaas, Esquire, patricia.delgado@bipc.com  
Christian Kohlsaas, christian.kohlsaas@bipc.com  
Christian Kohlsaas, patricia.delgado@bipc.com  
Cynthia J Dienstag, cjdpa1@aol.com  
David Macey, dm@davidmacey.com

David Young, 11thfc12@jud11.flcourts.org  
David Young, 11thFC12@jud11.flcourts.org  
Elliot B Kula, elliot@kulalegal.com  
Elliot B Kula, eservice@kulalegal.com  
Gonzalo R Dorta, grd@dortalaw.com  
Gonzalo R Dorta, jpedraza@dortalaw.com  
Gonzalo R Dorta, jgonzalez@dortalaw.com  
Hon Maria Espinosa Dennis, 11thFC07@jud11.flcourts.org  
Jeffrey B Crockett, jrockett@coffeyburlington.com  
Jeffrey B Crockett, bdiaz@coffeyburlington.com  
Jeffrey B Crockett, service@coffeyburlington.com  
Jim Montalvo, jim@montalvopa.com  
Jim Montalvo, hjm\_135@yahoo.com  
Jose C. Bofill Esq, bofill@bofilllaw.com  
Jose C. Bofill Esq, bofill@Bofilllaw.com  
Jose C. Bofill Esq, Bofillj@icloud.com  
Joseph S. Rosenbaum, jsr@rosenbaumacevedolaw.com  
Joseph S. Rosenbaum, ka@rosenbaumacevedolaw.com  
Joseph S. Rosenbaum, cv@rosenbaumacevedolaw.com  
Lazaro Vazquez, lazaro@vazquezpa.com  
Lillie Tejera, lillie@ybkklaw.com  
Lillie Tejera, lillie@ybkklaw.com  
Lillie Tejera, lillie@ybkklaw.com  
Luis M Padron, pleadings@padronlaw.com  
Luis M Padron, abeitra@padronlaw.com  
Luis M Padron, francie@padronlaw.com  
Marchelle Wiley, mw@wileyassociates.net  
Marchelle Wiley, service@wileyassociates.net  
Marchelle Wiley, thewfirm@outlook.com  
Marisol Rodriguez Basulto, eservice@brlawyers.com  
Marisol Rodriguez Basulto, service@brlawyers.com  
Matthew O'Brien, mobrien@dortalaw.com  
Melissa A Rodriguez, MAcosta@arpalaw.com  
Melissa A Rodriguez, melissa.acostarodriguez@bipc.com  
Melissa A Rodriguez, soraya.hamilton@bipc.com  
Melissa J. Jacobs, mjacobs@coffeyburlington.com  
Melissa J. Jacobs, YVB@coffeyburlington.com  
Melissa J. Jacobs, service@coffeyburlington.com  
Melissa J. Jacobs, mjacobs@coffeyburlington.com  
Melissa J. Jacobs, lmaltz@coffeyburlington.com  
Melissa J. Jacobs, service@coffeyburlington.com  
Melissa J. Jacobs, mjacobs@coffeyburlington.com  
Paola Rueda, prueda.hublot@gmail.com  
Raquel A Rodriguez, raquel.rodriguez@bipc.com  
Raquel A Rodriguez, soraya.hamilton@bipc.com  
Raquel A Rodriguez, eservice@bipc.com  
Raymond J Rafool II, SERVICE@RAFOOL.COM

Sonia Viola, sv@davidmacey.com

The Honorable Samantha Ruiz Cohen, 11thFC28@jud11.flcourts.org

Tyler A. Mamone, Esquire, tyler@mvlawpll.com

Tyler A. Mamone, Esquire, ramsey@mvlawpll.com

Tyler A. Mamone, Esquire, yetian@mvlawpll.com

**Physically Served:**

IN THE THIRD DISTRICT COURT OF APPEAL  
STATE OF FLORIDA

PIERIC JOEL VAUCHER DE LA CROIX,

*Appellant,*

v.

MARTHA CECILIA HERNANDEZ  
QUINTERO,

*Appellee.*

**CASE No. 3D24-0645**

LT No. 19-2661

**NOTICE OF VOLUNTARY DISMISSAL OF APPEAL**

Appellant, Pieric Joel Vaucher de la Croix, pursuant to Fla. R. App. P. 9.350(b), hereby notices the voluntary dismissal of this appeal, based upon a settlement, with each side to be responsible for their own fees and costs.

Respectfully submitted,

Elliot B. Kula  
Florida Bar No. 03794  
W. Aaron Daniel  
Florida Bar No. 99739  
KULA & ASSOCIATES, P.A.  
11900 Biscayne Blvd., Ste. 310  
Miami, Florida 33181  
Phone: (305) 354-3858  
[eservice@kulalegal.com](mailto:eservice@kulalegal.com)  
[elliott@kulalegal.com](mailto:elliott@kulalegal.com)  
[aaron@kulalegal.com](mailto:aaron@kulalegal.com)  
*Counsel for Appellant*

By: /s/ Elliot B. Kula  
Elliot B. Kula

## CERTIFICATE OF SERVICE

I certify that, on May 4, 2024, pursuant to Fla. R. Gen. Prac. & Jud. Admin. 2.516, this Notice of Voluntary Dismissal was served via the Florida courts ePortal on:

Raymond J. Rafool, II, Esq.  
Seth J. Rutman, Esq.  
Rafool, LLC  
900 Biscayne Bay Building  
990 Biscayne Blvd., Ste. O-301  
Miami, Florida 33132  
[Service@Rafool.com](mailto:Service@Rafool.com)  
*Counsel for Appellant*

Luis M. Padron, Esq.  
[pleadings@padronlaw.com](mailto:pleadings@padronlaw.com)  
[Impadron@padronlaw.com](mailto:Impadron@padronlaw.com)  
The Padron Law Group, P.L.L.C.  
135 San Lorenzo Ave., Ste. 650  
Coral Gables, Florida 33146  
*Counsel for Appellant*

Melissa J. Jacobs, Esq.  
Coffey Burlington, P.L.  
2601 South Bayshore Dr., Penthouse  
Miami, Florida 33133  
[mjacobs@coffeyburlington.com](mailto:mjacobs@coffeyburlington.com)  
[yvb@coffeyburlington.com](mailto:yvb@coffeyburlington.com)  
[service@coffeyburlington.com](mailto:service@coffeyburlington.com)

Gonzalo R. Dorta, Esq.  
Dorta Law  
334 Minorca Ave.  
Coral Gables, Florida 33134  
[grd@dortalaw.com](mailto:grd@dortalaw.com)  
[jgonzalez@dortalaw.com](mailto:jgonzalez@dortalaw.com)  
*Counsel for Appellee*

Anthony Accetta, Esq.  
Law Offices of Anthony Accetta, P.A.  
135 San Lorenzo Ave.,  
Penthouse 820  
Coral Gables, Florida 33146  
[law@anthonyaccetta.com](mailto:law@anthonyaccetta.com)  
[paralegal@anthonyaccetta.com](mailto:paralegal@anthonyaccetta.com)  
*Counsel for Appellee*

Andrew S. Berman, Esq.  
Amber B. Glasper, Esq.  
Young Berman Karpf & Karpf, P.A.  
825 Brickell Bay Dr., Tower III  
Suite 1748  
Miami, Florida 33131  
[aberman@ybkklaw.com](mailto:aberman@ybkklaw.com)  
[amber@ybkklaw.com](mailto:amber@ybkklaw.com)  
[eservice@ybkklaw.com](mailto:eservice@ybkklaw.com)

Barbara J. Riesberg, Esq.  
Taylor English Duma LLP,  
601 Brickell Key Dr., Ste. 700  
Miami, Florida 33131  
[briesberg@taylorenghish.com](mailto:briesberg@taylorenghish.com)  
[lhahn@taylorenghish.com](mailto:lhahn@taylorenghish.com)  
[hilis@taylorenghish.com](mailto:hilis@taylorenghish.com)

Christian C. Kohlsaas, Esq.  
Buchanan Ingersoll & Rooney, PC  
One Biscayne Tower  
2 South Biscayne Blvd., Ste. 1500  
Miami, Florida 33131  
[christian.kohlsaas@bipc.com](mailto:christian.kohlsaas@bipc.com)  
[patricia.delgado@bipc.com](mailto:patricia.delgado@bipc.com)

Lazaro Vazquez, Esq.  
Law Office of Lazaro Vazquez, P.A.  
145 Almeria Ave.  
Coral Gables, Florida 33134  
[lazaro@vazquezpa.com](mailto:lazaro@vazquezpa.com)

Tyler A. Mamone, Esq.  
Mamone Villalon  
100 Southeast 2<sup>nd</sup> St., Ste. 2000  
Miami, Florida 33131  
[tyler@mclawpll.com](mailto:tyler@mclawpll.com)  
[ramsey@mvlawpll.com](mailto:ramsey@mvlawpll.com)  
[yetian@mvlawpll.com](mailto:yetian@mvlawpll.com)

Jim Montalvo, Esq.  
Montalvo Law, P.A.  
848 Brickell Ave., Ste. 310  
Miami, Florida 33131  
[jim@montalvopa.com](mailto:jim@montalvopa.com)

By: /s/ Elliot B. Kula  
Elliot B. Kula