

ROBERT L. KAYE, B.C.S.*
MICHAEL S. BENDER, B.C.S.*
JEFFREY A. REMBAUM, B.C.S.*
DEBORAH S. SUGARMAN
ANDREW B. BLACK, B.C.S.*
PETER C. MOLLENGARDEN, B.C.S.*
JEFFREY D. GREEN, B.C.S.**
EMILY E. GANNON
DANIELLE M. BRENNAN, B.C.S.*
KERSTIN HENZE
ALAN SCHWARTZSEID, B.C.S.*
LAUREN T. SCHWARZFELD
JAY S. LEVIN
STUART M. SMITH
BENJAMIN L. HEYDLAUFF
JOSEPH C. STAYANOFF
ZACHARY S. MORSE
CHRISTOPHER B. POSNER
DAVID DILTS
ANTHONY J. RENALDO
MICHAEL A. GOLDSTEIN, B.C.S.*
LORI B. HILL
ERIC J. ALPERT
MELISSA HOWELL
CECILE F. COCHRAN
LISA A. MAGILL, B.C.S.*, OF COUNSEL



KBRLegal.Com

MAIN OFFICE:
1200 PARK CENTRAL BLVD SOUTH
POMPAHO BEACH, FL 33064
TEL. (954) 928-0680
FAX (954) 772-0319
(800) 974-0680

WITH ADDITIONAL OFFICES IN:
PALM BEACH GARDENS
ORLANDO
TAMPA
MIAMI

*BOARD CERTIFIED SPECIALIST IN
CONDOMINIUM AND PLANNED
DEVELOPMENT LAW

**BOARD CERTIFIED SPECIALIST IN
CONSTRUCTION LAW

June 26, 2026

**Sent via E-mail: manager@plazadelprado.net
Plaza Del Prado Condominium Association, Inc.
c/o Board of Directors**

**RE: Plaza Del Prado Condominium Association, Inc.
Statement of Pending Litigation**

Pursuant to the Board's recent request for a summary of pending lawsuits for Plaza Del Prado Condominium Association, Inc., ("Plaza Del Prado") the following is a summary of the pending non-foreclosure litigation cases:

1. Plaza Del Prado Condominium Association, Inc. adv. Steven Herschenhorn, as Parent and Natural Guardian of I.H., a minor, Miami-Dade Circuit Court Docket No. 2025-005156-CA-01. The Complaint is for damages for an alleged trip and fall on potholes, uneven concrete and/or disrepaired portions of the parking lot which occurred on or about April 5, 2023. Plaintiff alleges that due to Plaza Del Prado's failure to maintain and warn of a dangerous condition she has been damaged in excess of \$50,000.00. Plaza Del Prado submitted this matter to its insurance carrier, which is defending the case through the law firm of TorresVictor. Plaintiff filed their Motion for Leave to File Amended Complaint on November 7, 2025 to add the property management company to the lawsuit. The parties have exchanged written discovery and scheduled depositions. The Court issued an Order re-noticing the trial to October of 2026.
2. Plaza Del Prado Condominium Association, Inc. adv. Lisa Schwartzberg, Miami-Dade Circuit Court Docket No. 2026-004684-CA-01. The Complaint was served on March 18, 2026. Plaintiff has filed a lawsuit claiming negligence and declaratory judgment for a water leak caused by Co-Defendant Otto Hernandez in Unit 1701 that occurred on or about July 25, 2024 and lead to damage of Plaintiff's unit.

Plaintiff alleges that her damages exceed \$29,999.00, exclusive of interest and costs. Plaza Del Prado submitted this matter to its insurance carrier, which is defending the case through the law firm of Luks, Santaniello, Petrillo, Cohen & Peterfreund. The projected trial date is January 19, 2027.

Further information on this matter can be located at the online clerk's website for the Miami-Dade court at <https://www2.miami-dadeclerk.com/ocs/Search.aspx>.

We are unable to provide any opinion on the sufficiency or adequacy of any insurance coverage, the materiality of any impact any lawsuit may have on the community or its budget, the possible outcome of any pending Litigation or claim, the structural integrity of any building or unit, or the sufficiency of any repairs or other work.

I trust that the above and attached are responsive to your inquiry.

Very truly yours,

JEFFREY D. GREEN, ESQ.

JDG/jn