

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

CASE NO.: 07-43672 CA 09

STATE OF FLORIDA, OFFICE OF
FINANCIAL REGULATION,

Plaintiff,

v.

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

Defendants,

and,

DB ATLANTA, LLC, a Florida limited liability
company, et al.

Relief Defendants.

INTERVENOR IRA SUKOFF'S
NOTICE OF FILING OBJECTION TO RECEIVER'S
MOTION FOR COURT ORDER AUTHORIZING AN INTERIM PAYMENT
OF REASONABLE ATTORNEYS' FEES AND RECEIVER FEES IN CONJUNCTION
WITH THE NORMANDY HOLDINGS, II, LLC PROJECT

Intervenor, **IRA SUKOFF**, by his undersigned counsel, files this, his Objection to Receiver's Motion for Court Order Authorizing an Interim Payment of Reasonable Attorneys' Fees and Receiver Fees in Conjunction with the Normandy Holding, II, LLC

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Project dated November 13, 2008, on the basis that there has been no evidence that the **RECEIVER** has done anything beneficial whatsoever in this matter. Specifically, it has not been established that **NORMANDY HOLDINGS, II, LLC** ("**NORMANDY**") is a proper relief defendant in this proceeding and it is premature for this Court to consider this fee application.

Indeed, it appears that the claims raised by the **RECEIVER** have nothing to do with **NORMANDY** and that the **RECEIVER** is intentionally failing to join the proper parties to this proceeding.

WHEREFORE, Intervenor **IRA SUKOFF** requests that this Court deny this fee application in its entirety, together with such other and further relief this Court deems just and proper.

Respectfully submitted,

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By: _____

HOWARD N. KAHN, ESQ.
Fla. Bar No: 0724416

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail and facsimile to: **Cristina Saenz, Esq.**, Assistant General Counsel, State of Florida, Office of Financial Regulation, 401 N.W. 2nd Avenue, Suite N-708, Miami, Florida 33128; **Alan M. Sandler, Esq.**, Counsel for Defendants Joel and Deborah Sokol, Darlene Levasser, Robert Dzimidas IRA, Lawrence Meyer IRA, Lawrence Meyer Roth IRA and Mary Joe Meyer Roth IRA, of Sandler & Sandler, 117 Aragon Avenue, Coral Gables, Florida 33134; **Allan A. Joseph, Esq.**, Counsel for The Amid Companies and Amedia Family Investors, David & Joseph, P.L., 1001 Brickell Bay Drive, Suite 2002, Miami, Florida 33131; **Richard R. Robles, Esq.**, Counsel for the Four Ambassadors Association, Inc., Law Offices of Richard R. Robles, P.A., 905 Brickell Bay Drive, Tower II, Mezzanine, Suite 228, Miami, Florida 33131; **Lawrence M. Shoot, Esq.**, Counsel for USA Funding Mortgage, Inc., 4830 S.W. 92nd Avenue, Miami, Florida 33165; **James D. Gassenheimer, Esq.**, Counsel for the Receiver, Michael I. Goldberg, Berger Singerman, 200 S. Biscayne Boulevard, Suite 1000, Miami, Florida 33131; and **Daniel Kaplan, Esq.**, Counsel for Defendant Berman, 2875 N.E. 191st Street, Suite 600, Aventura, Florida 33180; this 17 day of November, 2008.



HOWARD N. KAHN

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