

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

CASE NO: 2021-026520-CA-01 CA44

STEPHEN EZEKIEL JOSEPH *et. al.*,

CBL Division

Plaintiffs,

v.

Daily Bread, LLC,

Defendant.

UNOPPOSED MOTION TO AMEND ORDER GRANTING APPOINTMENT OF RECEIVER
[SEEKING TO ADJUST FREQUENCY OF “MONTHLY” STATUS REPORTS]

Scott M. Dimond, as Receiver of Daily Bread, LLC, pursuant to the Court’s December 14, 2021 Order Granting Plaintiffs’ Emergency Motion for Appointment of Receiver, (the “Receiver”) hereby files this Unopposed Motion to Amend Order Granting Appointment of Receiver [Seeking to Adjust Frequency of “Monthly” Status Reports].

1. On December 14, 2021, this Court entered its Order Granting Plaintiffs’ Emergency Motion for Appointment of Receiver (the “Order”).

2. The Receivership Order provides that the Receiver shall file a report with the Court every thirty days regarding the status of his activities and any assets he is holding. *See* Order at ¶3.

3. Since the date of the Court’s entry of the Order, the Receiver has complied with the Order and has submitted seven monthly status reports.

4. In short, as set forth in those Status Reports, the Receivership Estate’s creditor class has been identified and the majority of the promptly ascertainable assets available to eventually compensate the creditor class have been identified and seized.

5. So, at present, the Receiver is focused on safeguarding the recovered assets and otherwise expects the ensuing months to concern the evaluation of claims against individuals and entities and their prospective litigation.

6. Consequently, the pace of activities has considerably slowed down since the date of the Receiver's appointment by the Court, and the Receiver expects future activity to occur on a less frequent basis for the time being in contrast to the months following his appointment.

7. As such, the Receiver seeks to amend the Order to adjust the frequency with which he is required to file his Status Report from every thirty days to every ninety days as of the date of the submission of his Seventh Status Report.

8. The Receiver has conferred with counsel for the Plaintiffs and the Intervenors, and they do not object to Court's amendment of the Order to permit the Receiver to file his Status Report every ninety days as of the date of the submission of his Seventh Status Report.

WHEREFORE, the Receiver respectfully requests the Court enter an order amending the Order such that the Receiver shall submit his Status Report every ninety days as of the date of the submission of his Seventh Status Report and granting such further relief as the Court deems just and proper.

Respectfully submitted,

By: s/ Lorenz Michel Prüss

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Counsel for Receiver

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on July 13, 2022, a true and correct copy of the foregoing document titled: UNOPPOSED MOTION TO AMEND ORDER GRANTING APPOINTMENT OF RECEIVER [SEEKING TO ADJUST FREQUENCY OF "MONTHLY" STATUS REPORTS] was filed with the Clerk of Court and served via e-mail upon counsel of record.

By: /s Lorenz Michel Prüss

Lorenz Michel Prüss