

**IN THE CIRCUIT COURT OF THE 16TH JUDICIAL CIRCUIT
FOR THE STATE OF FLORIDA, IN AND FOR MONROE COUNTY**

Case No. 44-2023-CA-000370-A0-01PK

UPPER KEYS DIVISION

STEWART TILGHMAN FOX & BIANCHI, P.A.,
WILLIAM C. HEARON, P.A., and
TODD S. STEWART, P.A.,

Plaintiffs,

vs.

HARLEY N. KANE, MICHELLE J. KANE,
SHECHTER & EVERETT, LLP, and
DAVID L. MANZ PROFESSIONAL
ASSOCIATION d/b/a THE MANZ LAW FIRM,

Defendants.

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**STIPULATION BY DEFENDANT SHECHTER & EVERETT FOR ENTRY OF
JUDGMENT**

Plaintiffs, Stewart Tilghman Fox & Bianchi, P.A. et al, and Defendant Shechter & Everett, LLP (“Shechter”), by and through their undersigned counsel, stipulate as follows:

1. Shechter stipulates that, to the extent that it possesses a lien or encumbrance of any description on that certain real property (“Property”) located at 107 Hilson Ct., Tavernier, FL, as more particularly described in paragraph 2 of the complaint (“Complaint”) in this action, such lien is subordinate and inferior to (i) the lien “(Judgment Lien)” of the 2023 Judgment described in paragraph 10 of the Complaint and to (ii) any equitable lien (“Equitable Lien”) on the Property established in this action in favor of Plaintiffs.

2. Shechter consents to the entry of a judgment on Counts I and II of this action, foreclosing the Judgment Lien and Equitable Lien and, specifically, foreclosing any lien or

interest that Shechter may possess against the Property, for any amounts established by Plaintiffs in this action.

3. Plaintiffs and Schechter agree that Plaintiffs have no monetary claim against Shechter and that they seek no remedy against Shechter in this action other than foreclosure of the Judgment Lien and Equitable Lien.

4. This Stipulation relates only to Shechter's interest in the Property and not to any other property. Except as provided in Paragraphs 1 through 3 above, this Stipulation is without prejudice to any claims, rights, liens, damages, or remedies that Shechter possesses against Harley N. Kane, Michelle J. Kane, or any real, personal, or intangible property (other than the Property described above), and Shechter expressly reserves all such rights and remedies.

DATED: January 22, 2024.

KOZYAK TROPIN & THROCKMORTON, LLP
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/s/ Melissa S. Chames
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of January, 2024, a true and correct copy of the foregoing was electronically served in compliance with Rule 2.516(a) and Administrative Order 13-49 through Florida Courts E-filing Portal via Email on Michelle Kane at shellybythesea16@gmail.com, Harley N. Kane at Harley.N.Kane@gmail.com, David L. Manz at dln@gmpalaw.com and Melissa S. Chames at melissachames@outlook.com.

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