

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

**COMPLEX BUSINESS DIVISION**

FUQUAN THOMAS,  
LAWONDA BREEDLOVE,  
CATRESA MONTGOMERY,  
LOVESTER MONTGOMERY,  
SHEKITA WHITFIELD, GRECIA  
BOZEMAN and JOANNA MANZI,  
on behalf of themselves and all others  
similarly situated,

CASE NO.: 2023-19490-CA-01

Plaintiffs,

v.

Prestige Management Solutions, Inc.,

Defendant.

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**NOTICE OF CLASS ACTION**  
**(LAWSUIT AGAINST PRESTIGE MANAGEMENT)**

**To All Potential Members of this Class:**

All tenants and others who lawfully resided in a condominium unit at New World Condo on January 28, 2023.

The class expressly excludes the following individuals: Prestige Management Solutions, Inc., the New World Condominium Apartments Condominium Association, Inc., New World Condo unit owners and their spouses, any officers and directors of the Association, together with legal representatives, heirs, successors, or assigns of any of the foregoing, and any judicial officer assigned to this matter and his or her immediate family.

**THIS NOTICE MAY AFFECT YOUR RIGHTS, PLEASE READ IT CAREFULLY.**

**YOU HAVE NOT BEEN SUED.**

Former tenants of New World Condo have sued Prestige Management Solutions Inc. (“Prestige”), the Association’s property management company. Plaintiffs, in a separate class action case, have sued the New World Condominium Apartments Condominium Association Inc. (the “Association”) individually and in its capacity as a representative for the unit owners at the New World Condo. Both lawsuits allege that the Association, its unit owners, and Prestige failed to maintain the property or install adequate fire stops, neglected critical fire safety measures, among other things, and hired an unlicensed contractor whose faulty work caused a devastating fire. Plaintiffs claim that these failures resulted in the destruction of residences, the loss of personal

belongings, and the forced eviction of tenants. Although Plaintiffs have filed two separate cases, any recovery of damages may only be awarded in one case, not both.

This Lawsuit is a **Class Action** on behalf of all tenants and others who lawfully resided in a condominium unit at New World Condo on January 28, 2023, and who suffered damages due to or resulting from the fire. The lawsuit seeks compensation for lost or damaged property as well as relocation expenses caused by or resulting from the fire.

The Court has not yet decided whether Prestige did anything wrong. There is no money available right now. There is no guarantee that there will ever be any money recovered from Prestige. However, your legal rights are affected. **You must decide now whether to remain a member of the Class or to opt-out of the Class.**

Your options are explained in this notice.

**To opt-out, you must act no later than June 27, 2025.**

Unless this case is resolved by settlement, Class Counsel must prove the validity of the claims against Prestige. If money is obtained from Prestige, you will be notified how to obtain your share of the recovery.

Any questions not answered by this Notice of Class Action (the “Notice”) should be directed to Class Counsel and not the Court by following the directions in this Notice.

### **WHY THIS NOTICE WAS SENT TO YOU**

Materials and other information provided to us to date from the Association, Prestige, Florida Power & Light, and the American Red Cross and information found on public sources, indicated that you were a tenant or a lawful occupant of New World Condo on January 28, 2023, and are therefore a prospective member of the Class. This Notice is sent to you pursuant to Florida Rule of Civil Procedure 1.220(d)(2), requiring that all members of the Class who can be identified and located be provided with certain information regarding this Lawsuit and their rights.

### **BACKGROUND OF THE LAWSUIT**

Plaintiffs are former tenants of New World Condo who sued on their own behalf and as representatives of all tenants and lawful occupants on January 28, 2023. Plaintiffs sued Prestige alleging, among other things, that they failed to maintain the property, including fire safety measures, and hired an unlicensed contractor whose faulty work caused a devastating fire. The fire destroyed residences, displaced families, and led to damage or loss of property. The lawsuit seeks damages for lost or damaged property as well as relocation expenses.

Prestige denies the allegations. There is no guarantee money, or any recovery, will ever be obtained. If any money is recovered, you will be notified about how to obtain your share of the recovery.

## **CLASS CERTIFICATION**

On April 23, 2025, Circuit Judge Thomas J. Rebull of the Eleventh Judicial Circuit (Miami-Dade County) determined that this Lawsuit is appropriate as a Class Action. The Class involved is the following: All tenants and others who lawfully occupied a condominium unit at New World Condo on January 28, 2023.

The estimated number of Class Members is at least 140, not including minor children. The persons named at the beginning of this Notice are the Class Representatives. The Class Representatives seek relief on behalf of themselves and all Class Members.

## **CLASS COUNSEL**

The Class Counsel (Lawyers) are **Kozyak Tropin & Throckmorton LLP (Dwayne A. Robinson, Benjamin J. Widlanski, and Abe Andrew Bailey)**, and **Stewart Tilghman Fox Bianchi & Cain, P.A. (Michael E. Levine)**.

## **RIGHT TO SEPARATE COUNSEL**

You have the right to hire your own lawyer. Unless you retain your own lawyer to enter an appearance on your behalf, you will be represented by Class Counsel if you do not opt out of the class. If you choose to hire your own lawyer, you are responsible for your lawyer's legal fees and costs.

## **ATTORNEYS' FEES**

As a Class Member, you will not be directly charged by Class Counsel to represent you in this Lawsuit. In the event of a judgment or a settlement in favor of the Class in this Lawsuit, Class Counsel will apply to the Court for payment of reasonable attorneys' fees and costs that will be deducted from the funds recovered before net proceeds are distributed to the Class Members.

## **YOUR OPTIONS**

The purpose of this Notice is to advise you of the Lawsuit and how it may affect your rights. You must decide whether to opt-out of the Class. You must make your decision no later than **June 27, 2025**, by following the instructions below.

<b>DO NOTHING</b>	By doing nothing you will remain a member of the Class. Your interests will be represented by Class Counsel. You will be bound by the outcome of this Lawsuit. In the event of a favorable judgment, you will share in the recovery. In the event of an unfavorable judgment, you will be precluded from bringing the same or similar claims against Prestige Management Solutions Inc., on your own behalf. Any judgment, whether favorable or not, will include all class members who do not opt-out. You are entitled to notice and opportunity to be heard regarding any proposed settlements or dismissal of this Lawsuit. You will be entitled to share in settlement proceeds obtained on behalf of the Class.
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	<p><b>If you want to remain a member of the Class, you should NOT SIGN the “Request for Exclusion from Class” form.</b></p>
<b>OPT-OUT</b>	<p>By opting out of the Class, your interests will not be represented by Class Counsel. You will not be bound by the outcome of this Lawsuit unless you seek to intervene in the Lawsuit. In the event of a favorable judgment, you will not share in the recovery. In the event of an unfavorable judgment, you may still assert the same or similar claims you may have against Prestige Management Solutions, Inc., if any. You are not entitled to notice of or an opportunity to be heard regarding any proposed settlement or dismissal of the Lawsuit. You are not entitled to share in any settlement proceeds obtained on behalf of the Class.</p> <p><b>If you want to be excluded from the Class, you must complete the enclosed Opt-Out Form (“Request for Exclusion from Class”) and return it by U.S. Postal Service mail, postmarked no later than June 27, 2025, to:</b></p> <p><b>Kozyak Tropin &amp; Throckmorton LLP</b>  <b>Attention: New World Association Class Action</b>  <b>2525 Ponce de Leon Blvd., 9th Floor</b>  <b>Coral Gables, Florida 33134</b></p> <p>If you request exclusion on behalf of any person or entity other than yourself, you must state your legal authority to execute the request of that other person or entity. Any individual who timely requests to opt out of the class will be excluded out of the class.</p>

### **FURTHER COURT PROCEEDINGS**

You may communicate with Class Counsel if you have any evidence you believe is helpful to establish the Class claims. You may be asked by the parties to provide information relevant to the Lawsuit.

If it becomes necessary to hold a trial to resolve this Lawsuit, there is no guarantee the Plaintiffs will win, or that they will recover any money for the Class. You do not need to attend the trial. Class Counsel will represent the Class Representatives and the Class Members. The law firm of Daniels, Rodriguez & Cruz, PA, will represent Prestige. You or your own lawyers can attend any court proceedings at your own expense. Any person who does not request to opt-out may make a separate appearance with the Clerk of Court, Eleventh Judicial Circuit, no later than **June 27, 2025**.

### **ADDITIONAL INFORMATION**

If the Class Representatives obtain any money or benefits as a result of this Litigation, you will be notified how to participate in the recovery. We do not know how long this will take.

Any questions you have concerning the matters contained in this Notice MUST NOT be made to the Court, but should be directed in writing and mailed to:

**Kozyak Tropin & Throckmorton LLP**  
**Attention: New World Association Class Action**  
**2525 Ponce de Leon Blvd., 9th Floor**  
**Coral Gables, Florida 33134**

### **REMINDERS AS TO TIME LIMIT**

If you wish to be excluded (Opt-Out) from the Class, you must return the Completed “Request for Exclusion from Class” Opt-Out Form to Class Counsel by U.S. Postal Service mail **postmarked by June 27, 2025.**

Dated: \_\_\_\_\_