

SKATOFF, PA

The Florida Law Firm for Probate

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Dear Clients of Skatoff PA:

The attorney for the Baker Estate has sent out a draft agreement to suspend the time to file an independent action.

To review, under Florida probate procedures, a claimant files a creditor claim against an estate. I have done that on your behalf. An estate can file an objection to the creditor claim, by the later of the filing of the claim or one month after the close of the creditor claims period. The attorney for the Baker Estate filed an objection to your claim. After objection, the creditor has 30 days within which to file the independent action against the Estate.

An independent action is not filed in the probate court, but rather in the general civil jurisdiction of the Collier County Circuit Court or Federal court.

As has been explained, there is no upside to filing a lawsuit against the Estate at the moment. Your primary source of redress will be the investment company. At some point you may need to file a lawsuit against the investment company, but that day has not yet arrived. It will be less expensive to allow the Estate to gain control of the investment company and secure your investment. Unfortunately, I have very little visibility into the efforts of the Estate to secure your investment in the investment company.

The attorney for the Baker Estate took my draft suspension agreement and made some modifications to it. I am satisfied that this agreement adequately protects your rights.

I am recommending that you authorize me to execute and file the suspension agreement on your behalf. Please let me know if you authorize me to do so. The deadline for filing the suspension agreement or filing the independent action is May 21, 2023.

Please call or email with any questions.

Regards,

/s/

Jeffrey H. Skatoff