



PALM BEACH COUNTY BAR ASSOCIATION

BULLE^{IN}

www.palmbeachbar.org

June 2017



YLS will host their 8th Annual Fishing Tournament on June 10th. Proceeds from this event will benefit Legal Aid's Educational Advocacy Project. It's not too late to participate in the fishing and the fun. Please visit our website for more information.

Florida Bar honors PBCBA Judicial Relations Committee



Kara Berard Rockenbach, FL Bar Standing Committee on Professionalism Vice Chair & Chief Judge Jeffery Colbath



Chief Judge Jeffery Colbath & Liz Herman

Chief Judge Jeffrey Colbath and Judicial Relations Committee Chair Liz Herman recently accepted the Florida Bar Professionalism Award for the committee's "Breakfast with the Judges" program. "Breakfast with the Judges" was chosen out of 11 statewide nominees to receive this coveted award and a \$500.00 check. We are so proud of our outstanding judiciary and our hard working committee members who made this program a reality and a beacon for other bar associations across the state. Mark your calendar and join us at our next "Breakfast with the Judges" on Tuesday, June 6 from 7:45 a.m. to 8:30 a.m. at the North End of the Cafeteria at the main Courthouse in West Palm Beach. The program is FREE for PBCBA members! RSVP online @ www.palmbeachbar.org

Last Chance to Register for the Installation Banquet June 17

Please join us for the Bar's annual Installation Banquet scheduled for Saturday, June 17 at the Breakers Hotel in Palm Beach. This special evening is one of our largest and well attended events of the year! Rosalyn Sia Baker-Barnes will be sworn in as the 95th president along with Gregory Huber as president-elect, immediate past-president John R. Whittles and directors Jessica Callow, Lindsey Demmery, Lee McElroy, Ned Reagan, Grasford Smith, Scott Smith, Julia Wyda and Dean Xenick. Also included on the Board are W Scott Mason, North County Section President and Andrea Lewis the Young Lawyers President. Pre-registration is required and can be made online at www.palmbeachbar.org. Deadline to register is June 9

Mark your calendar for upcoming Membership Events

June 10:
YLS Fishing Tournament

June 17:
Installation Banquet

July 14:
YLS Golf Tournament

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THE BULLETIN

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The mission of the Palm Beach County Bar Association is to serve its members, foster professionalism and enhance the public's understanding and awareness of the legal system.

LETTERS TO THE EDITOR

The Palm Beach County Bar Association Bulletin welcomes your comments on topics relating to the law, the legal profession, the Palm Beach County Bar Association or the Bar Bulletin. Letters must be signed, but names will be withheld upon request. The editor reserves right to condense.



Send letters to:
EDITOR Bar Bulletin
Palm Beach County Bar Association
P.O. Box 17726
West Palm Beach, FL 33416

Board Meeting Attendance

	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR	APR
Barnes	X		phone	X	X	X	X	X	X	X
D'Amore	X	X	X	phone	X	X	X	phone	X	
Huber	X	X	X	X	X	X	X	X	X	X
Mason	phone	X	X	X	X	X	X	X	X	X
McElroy	X	X	X	X	X	X	X	X	X	phone
Pressly	X	X	X	X	X		X	X	X	X
Reagan	X	X	X	phone	X	X	X	X		X
Smith, G.	X	X	X	X	X	X	X	X	X	X
Smith, S.	X	X	X	X	X	X	X	X	X	X
Whittles	X	X	X	X	X	X	X	X	X	X
Wilson	X	X	X	X	phone	X	X	phone	X	X
Wyda	X	X	X	X	X		X		phone	phone
Xenick	X	X	X	X	phone	X	phone	X	phone	phone



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Thank You; What a Year!

by John R. Whittles

Time flies. It has been a great year. Although highlights are too numerous to mention all of them, a few are:

New Leadership at Executive Director

When Patience announced to our Board at our March 2016 board meeting that she made the difficult decision to retire and that she would be doing so in a few months, everyone in the room fell out of their respective chairs. When I silently did the math and realized that Patience's thirty-seven years of experience and leadership would be exiting while I was president, I fell out of my chair a second time. Thankfully, our then-president Grier Pressly put together a great selection committee headed by Greg Coleman. That committee and our board carefully considered and systematically culled through almost 100 candidates and wisely chose Carla Tharp Brown and we have never looked back. I am very proud to say I think we got that decision right and the bar will benefit for years from Carla's leadership.

New Judges

We welcomed in several new judges this year, including newly minted County Court Judges Dana Santino and Bradley Harper, new Circuit Court Judges Cymonie Rowe, Lou Delgado, Sherri Collins and James Ferrara and new Fourth DCA Judge Jeffrey Kuntz. These judges come from diverse backgrounds and all share an exuberance for their positions and have hit the ground running. The bench in Palm Beach County seems to be in great shape for years.

Long Term Evaluation of our Bar Association

This year, the Board of Directors implemented a plan to review how we serve our members and conduct business and to make any changes that appear necessary based on a five-year forecast of changing member needs and a changing legal market. We identified areas of study centering on technology, our member needs, our bar leadership and organized committees to assess where we are and where we need to go to maintain our sound financial status and continue to serve our members and the community. The study is underway as we speak and should be completed next year. Any action recommended as a result of that study will be put before the membership soon thereafter.

Fire!

The fire we suffered at the bar office was a major headache and inconvenience for all of us and we are working hard to get the building up and running by the end of 2017. The bad news is the strain this event put on our members and staff. The not-so-bad news is we have good insurance and we learned a valuable lesson regarding testing our emergency plans in a crisis event where nobody was hurt and we made it through ok. Soon, our building will be as good as or better than it was and, in the long run, we will be a better association because of it.

Great Staff and a Great Board

Regarding the staff, meeting the expectations of our bar's business every year (in a normal year) is hard enough. However, in a year like this one – with a new executive director, a so-so president and a building fire – the staff really had to double their efforts to get to the same place as other years. Well, I can tell you they have exceeded all expectations again. Membership events were great, we had great sponsors, and all of our programs went along as normal despite the challenges this year presented. Regarding the board, we have had a great string of boards since I've been around but I have to say this one may be the best. There were varied personalities and strengths and everyone had good ideas and was willing to work. It was a great group to work with.

Great Speakers

We had several great speakers this year, including the former general counsel of Major League Baseball, but Amanda Knox as the key note speaker for the Law Week Luncheon on April 26, 2017, certainly took the cake. For those of you that missed her presentation, you really missed a special event as she was as compelling a speaker as I have heard. Her story and the way she described it was riveting and everyone in the room seemed to be hanging on her every word. Her story as commentary on the concept of justice also fit perfectly with the theme of Law Week.

Main Courthouse Named After Judge Hurley

On May 2, 2017, the Palm Beach County Board of Commissioners voted unanimously to name the main state courthouse in West Palm Beach after retired Federal Judge Daniel T.K. Hurley. Judge Hurley previously served as a County Court Judge and Circuit Judge in Palm Beach County before taking the federal bench. Judge Hurley, who was then the Chief Judge of the Fifteenth Judicial Circuit worked tirelessly to lobby for the great courthouse we all take so much pride in. Judge Hurley had a long career as a federal judge and is universally admired and respected for his abilities and also as a person. It is a fitting honor that the courthouse will now bear his name.

Thanks

Thanks to all of the members for allowing me to serve. It has been a really good year despite the challenges and, with Sia Baker-Barnes coming in as next year's President, our Bar Association will be in even better hands. I am looking forward to our association continuing to be the example for other associations around the state.

Judicial Reception

Nearly 300 members attended our Judicial Reception to honor our local judges and their Judicial Assistants. The event was held at the Harriet in West Palm Beach as part of Law Week.



Phil Hutchinson and Judge Lou Delgado



Judge Scott Suskauer and Scott Smith



Steve Fischer and Michael Greenberg



Judicial Assistant Gloria Lozano and Judge Daliah Weiss



Greg Weiss, Sia Baker-Barnes and Alan Rose



Jessica Latour, Judge Ted Booras and Andrea Amigo



**Mariano Garcia,
Michelle Suskauer
and Lloyd Comiter**





So You Want To Be A Business Lawyer: A Few Practical Suggestions For Making The Transition From Student To Practitioner

by Grasford W. Smith

Most business law students find it difficult to transition from student to practicing business lawyer. As a former associate and now law firm partner, I have interviewed dozens of law students from the best law schools around the country and many of them ask for suggestions about what they can do to prepare themselves for a successful transition to practicing law. The truth that most of us know is that law schools traditionally do a poor job of preparing students for the practical challenges of the real world. Yet, there are some basic things that can be done to make the transition more seamless.

First, carefully choose your coursework. If you want to be a business litigator, you should take advanced courses on evidence, procedure, persuasive writing, and everything dealing with contracts. After gaining these fundamental building blocks, I highly encourage students to take a law school clinic and aggressively pursue opportunities to interact with clients and practicing lawyers. Your clinic experience may also inform whether you want to spend the next 40 – 50 years of your life doing a particular kind of work. NYU Law's Civil Litigation Clinic is precisely the right type of clinical education that provides law students with unparalleled access to real world experience, including meeting with clients, drafting pleadings, preparing discovery requests and motions, taking depositions, and appearing in court for hearings or trials.

Second, build your skills outside of law school coursework. For example, while I was a law student at NYU, I participated in a mediation program and mediated small claims cases with real people who were passionate about their issues. Although the dollar amounts of the small claims cases were quite low, I gained soft skills from these experiences that helped me to successfully resolve multi-million dollar cases at mediation in my current law practice. At NYU Law, I also participated in a High School Law Institute Program and taught contracts and constitutional law to high school students. My experience in explaining legal concepts to high school students helped me as a young lawyer to explain difficult legal concepts to law firm partners.

Third, be open to trying different practice areas. I am often amazed when I interview law students who tell me they know precisely what they want to do before they start in the summer program. How do they know for sure? The best approach is to use the summer associate experience to try out as many different areas as the firm will allow. Some firms, such as my first employer Skadden, Arps, Slate, Meagher & Flom, are fairly flexible in allowing students to try several practice areas during the summer program. You will have a much better idea by the end of the summer program which practice group best suits your skills and personal preferences. You may also learn whether the law firm you choose for a

summer program is the best platform to grow your skills and practice as a young lawyer.

Fourth, and perhaps most importantly, find a mentor. This may be the most important advice for law students transitioning to a law practice. A mentor can provide you the exposure that you need to gain experience at the right pace. A well-placed mentor can also advocate for your success within your chosen organization. Remember that a mentor-mentee relationship is a two-way street. Figure out how you can add value for your mentor and do it often.

In conclusion, being a successful business lawyer is as much about your technical skills as it is about your ability to inspire confidence in others. Law students should aggressively pursue opportunities (structured or otherwise) to interact with others and put their substantive knowledge into practice in real-world situations. The more comfortable you are with yourself and your abilities, the more quickly others will feel comfortable relying on you to solve complicated problems.

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The Community Association Law CLE of the
Palm Beach County Bar Association
presents:



28th Annual Community Law Seminar

Friday, June 9, 2017, 7:45a.m. - 1:00p.m.

LOCATION: Fourth District Court of Appeal, 1525 Palm Beach Lakes Blvd., WPB

7:45a.m. - 8:00a.m. **Late Registration and check-in**

8:00a.m. - 8:05a.m. **Welcome:** Tanique G. Lee, Esq., Committee Chair, Gelfand & Arpe, P.A.

8:05a.m. - 8:35a.m. **Lien Priority in Community Associations and Ethical Considerations:**
Steven D. Rubin, Esq., Florida Bar Board Certified Real Estate Lawyer,
Florida Supreme Court Certified Circuit Mediator, Steven D. Rubin, Esq., Law Offices of
Steven D. Rubin

8:35a.m. - 10:10a.m. **Bankruptcy Basics and Impact of Bankruptcy on Associations...**
What Every Association Attorney Should Know: Nadine V. White-Boyd, Esq.,
White-Boyd Law, P.A. and Malinda Hayes, Esq., Markarian, Frank & Hayes, P.A.

10:10a.m. - 10:20a.m. **Break**

10:20a.m. - 11:15a.m. **What's New in Fair Housing, Criminal Record and Marijuana:**
Pamela Guerrier, Esq., Director, Palm Beach County Office of Equal Opportunity

11:15a.m. - 12:00p.m. **Responding to Requests for Reasonable Accommodation:**
A Defense Guide: Kyle T. Berglin, Esq., Boyd Richards Parker & Colonnelli, P.L.

12:00p.m. - 1:00p.m. **Legislative & Case Law Update: Practical and Ethical Implications:**
Michael J. Gelfand, Esq., Florida Bar Board Certified Real Estate Attorney, Florida
Supreme Court Certified Mediator: Civil Circuit Court & Civil County Court, Fellow,
American College of Real Estate Lawyers, Gelfand & Arpe, P.A.

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**Materials will be emailed to
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(6.9 Community law).



The Veterans' Legal Services Framework in Florida – Part II

by James P. Curry

The Veterans' Legal Services This article is the second in a series that briefly describes some institutions of the veterans' legal services framework in

Florida to inspire Palm Beach County Bar

Association attorneys interested in serving veterans to act. The focus of this article is the Palm Beach County Veterans Court, and the Florida Veterans' Foundation, an affiliate of the Florida Department of Veterans' Affairs.

The Palm Beach County Veterans Court

The Palm Beach County Veterans Court ("PBCVC") is "built upon a unique partnership between the Judiciary, Veterans Administration, West Palm Beach VA Medical Center, State Attorney, Public Defender, Probation (Felony and Misdemeanor), Clerk and Comptroller, Administrative Office of the Court, Sheriff, and other community partners from the criminal justice and treatment communities. It is a program that structures the treatment of veterans around the authority and personal involvement of a single Veterans Treatment Court Judge."¹

The Veterans Treatment Court is "also dependent upon the creation of a non-adversarial courtroom atmosphere where a single judge, dedicated court staff, the treatment team, and the Mentors work together toward the common goals of breaking the cycle of substance abuse and criminal behavior, and addressing mental and physical health issues. An environment with clear and certain rules is created, and each participant's compliance is within his or her own control."²

The PBCVC aims to address the complex needs of veterans in the system, who have a difficult time re-entering the civilian population due to post traumatic stress disorder, injury, disability, substance abuse, other mental health problems, compounded by the lack of jobs, family and housing issues, and other social obstacles have taken their toll on veterans from many wars and conflicts.³

One effective way that the PBCVC addresses the foregoing needs is via its mentoring program, where "each veteran in the program is assigned a mentor, most of the time from the same branch of service. This is the key to the success of the program. The veteran is not alone. His or her mentor is there for them every step of the way. A strong bond is forged between the Mentor and the Veteran. Working together, nearly all veterans are able to successfully complete the mandated program and go back to their lives."⁴

The spirit of the PBCVC is to give veterans who are referred to the court a second chance.⁵ The State Attorney's Office and Public Defender's Office at times have pro bono opportunities for attorneys who are interested in serving the community. Contact them to learn if there are any pro bono opportunities involving the Veterans Court.

¹ <http://www.pbcvti.org/>

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

The Florida Department of Veterans' Affairs and the Florida Veterans' Foundation

By act of the 2008 Florida Legislature, the Florida Department of Veterans' Affairs⁶ ("FDVA") was authorized to establish a direct-support organization to aid, funding, and support for FDVA in carrying out its mission.⁷ The Florida Veterans' Foundation ("FVF"), accordingly, was established.

The FVF is "a Florida non-for-profit corporation established to operate as a direct support organization of the FDVA as provided by section 292.055, Florida Statutes, organized and operated exclusively to obtain funds, request and receive grants, gifts, and bequests of moneys; acquire, receive, hold, invest, and administer in its own name securities, funds, or property; and make expenditures to or for the direct or indirect benefit of FDVA, the veterans of this state, and congressionally chartered veteran service organizations."⁸

The FVF team members are volunteers, and most of the foundation's directors are "retired, military disabled veterans who donate over 40 hours per week of their time to assist and help guide Florida's veterans through a myriad of issues veterans face today. Whether it's access to healthcare, education, jobs, VA benefits or the like, the [FVF] Directors" are available to assist Florida veterans.⁹

Several FVF Directors, as trained Veteran Service Officers, "are familiar with the extent, the meaning and the application of laws that have been passed by Congress in the interests of veterans and their dependents."¹⁰ Further, the Directors are familiar with the various rules and regulations adopted by the Department of Veterans Affairs to clarify and implement those laws.¹¹

The Directors of the FVF welcome all attorneys in the Palm Beach County community who are interested in supporting the FVF mission and helping veterans to contact the FVF to learn about opportunities.

Conclusion

This article briefly describes some institutions of the veterans' legal services framework in Florida and the Palm Beach County community. If you are inspired to learn more about serving veterans, take the initiative and contact one or more of the institutions to find out how you can. Also, work with the PBCBA to aid them in coordinating with the ABA and the Military Affairs Committee of the Florida Bar in enhancing veteran's legal services in the Palm Beach County community.

The next article in this series will focus on United Way MISSION UNITED, the VA accreditation program for attorneys, and fighting veterans homelessness in Palm Beach County.

⁶ <http://floridavets.org/>

⁷ <https://floridaveteransfoundation.org/>

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

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by **Manuel Farach**

Flournoy v. CML-GA WB, LLC, Case No. 16-10073 (11th Cir. 2017).

A landlord rebutting circumstantial claims of racial discrimination in violation of 42 U.S.C. § 1981 must only produce legitimate, non-discriminatory reasons for the treatment.

Edmonds v. U.S. Bank National Association, Case No. 2D15-2590 (Fla. 2d DCA 2017).

A witness must have personal knowledge of a company's regular practice of mailing letters for a court to adopt the rebuttable presumption of mailing as a routine business practice.

Dyck-O'Neal, Inc. v. Meikle, Case No. 4D15-3911 (Fla. 4th DCA 2017).

A court may later acquire jurisdiction over an individual for deficiency suit purposes even if the foreclosure was first conducted by publication, i.e., non-personal service.

Mancinelli v. Davis, Case No. 4D15-4249 (Fla. 4th DCA 2017).

The Intra-Corporate Conspiracy Doctrine applies in Florida as an agent cannot conspire with its principal (the corporation).

JPMorgan Chase Bank National Association v. Jean Pierre, Case No. 4D16-1119 (Fla. 4th DCA 2017).

A witness need not have personal knowledge of a breach letter being sent so long as the witness testifies from the business records and the business records demonstrate the breach letter was sent.

Investor Trustee Services, LLC v. DLJ Mortgage Capital, Inc., Case No. 5D15-3082.

A person who purchases property after the filing of a lis pendens is a purchaser pendente lite and is not entitled to intervene or participate in the pending litigation.

Florida Department of Revenue v. DirecTV, Inc., Case No. SC15-1249 (Fla. 2017).

Florida Statute sec. § 202.12(1), which imposes different taxes on cable and satellite providers, does not violate the dormant Commerce Clause.

Trial Practices, Inc. v. Hahn Loeser & Parks, LLP, Case Nos. 2D13-6051 & 2D14-86 (Fla. 2d DCA 2017).

The Second District adopts the reasoning of *Waverly Las Olas Condominium Ass'n v. Waverly Las Olas, LLC*, 88 So. 3d 386 (Fla. 4th DCA 2012), and holds particular attorney's fees provisions permit an award of fees for seeking fees.

Corrections Corporation of America v. City of Pembroke Pines, Case No. 4D14-4815 (Fla. 4th DCA 2017).

A municipality has no obligation to provide utility services outside its boundaries unless it has contracted to do so or has otherwise assumed the duty to do so by holding itself out as the public utility for the affected area.

Nationstar Mortgage LLC v. Glass, Case No. 4D15-4561 (Fla. 4th DCA 2017).

The Fourth District follows *Bank of New York Mellon Trust Company, N.A. v. Fitzgerald*, 42 Fla. L. Weekly D519 (Fla. 3dDCA Mar. 1, 2017), and holds that a party that successfully defends claiming the plaintiff's lack of standing is not entitled to an award of contractual prevailing party attorney's fees since there is no contract between the parties.

Nationstar Mortgage Company v. Levine, Case No. 4D16-615 (Fla. 4th DCA 2017).

Parol evidence is generally not admissible to explain a patent ambiguity, but may be employed to explain a latent ambiguity or to explain a patent ambiguity when the identity, capacity or the parties' relationship with one another is at issue.

Paul v. Avrahami, Case No. 4D16-1456 (Fla. 4th DCA 2017).

The Supplementary Proceedings statute, Florida Statute section 56.29, provides only for an award of fees or costs to the judgment debtor and does not provide for an award against the implied defendant.

Busch v. Lennar Homes, LLC, Case No. 5D16-1626 (Fla. 5th DCA 2017).

A "punch list" clause may extend "completion" of the sales contract beyond the closing date, and accordingly, may extend the running of the statute of limitations and the statute of repose.

Goodyear Tire & Rubber Co. v. Haeger, Case No. 15-1406 (2017).

A federal court exercising its inherent authority to sanction for misconduct is limited to imposing sanctions in the amount of the damage caused by the misconduct.

Hill v. Suwannee River Water Management District, Case No. 1D16-3343 (Fla. 1st DCA 2017).

The actions of a governmental entity in draining a pond and flooding fields are not quasi-judicial in nature, and therefore, the governmental entity is not entitled to quasi-judicial immunity for its actions.

Cohen v. Jain, Case Nos. 3D16-281 & 3D16-1297 (Fla. 3d DCA 2017).

A promissory note which provides only for simple, not compound, interest will allow only a final judgment containing simple and not compound interest.

Fouche v. Pilot Catastrophe Services, Inc., Case No. 5D16-848 (Fla. 5th DCA 2017).

A trial court granting a motion to compel arbitration should, pursuant to Florida Statute section 682.03(7) stay and not dismiss the trial court proceedings pending the decision of the arbitral panel.

Santa Monica Beach Property Owners Association, Incorporated v. Acord, Case No. 1D16-4782 (Fla. 1st DCA 2017).

The manner in which property is used, i.e., used for residential or business purposes, determines whether a "no businesses" restriction is violated. Accordingly, short-term home rentals do not violate a "no businesses" association restriction because the use of the property is residential.

The Bank Of New York Mellon v. Glenville, Case No. 2D15-5198 (Fla. 2nd DCA 2017).

A claimant to surplus funds under Florida Statute section 45.031(7)(b) must file their claim within sixty (60) days of the foreclosure sale and not within sixty days of the issuance of the certificate of title; conflict certified with *Straub v. Wells Fargo Bank, N.A.*, 182 So. 3d 878, 881 (Fla. 4th DCA 2016).

Highlands-In-The-Woods, L.L.C. v. Polk County, Case No. 2D15-2801 (Fla. 2nd DCA 2017).

Requiring a developer to connect to a reclaimed water system is a permissible development exaction that satisfies the *Nollan/Dolan* test as using reclaimed water is a legitimate state interest.



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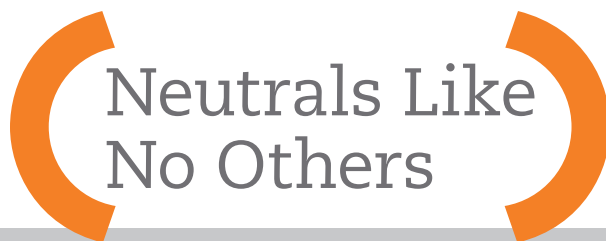


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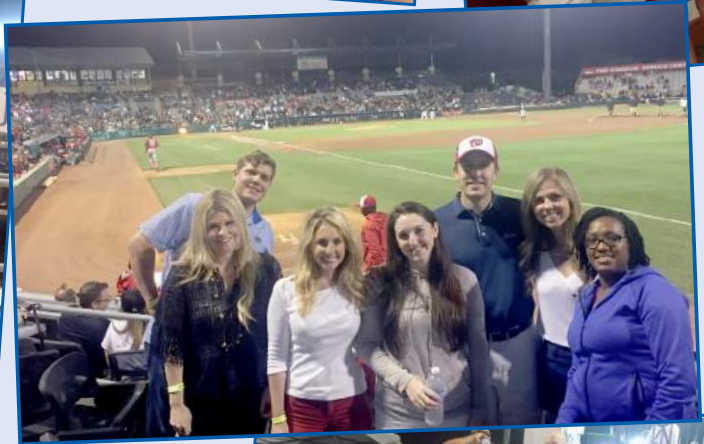
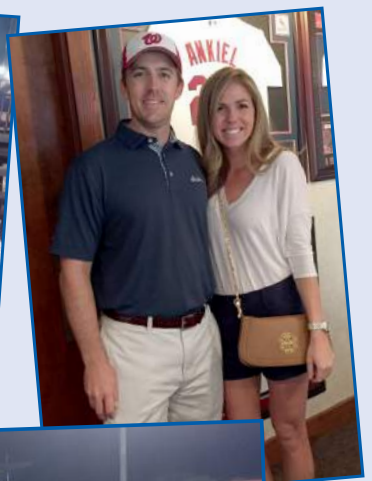
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The Appellate Practice Committee of the
Palm Beach County Bar Association
presents:



Preservation of Error for Trial Attorneys

Thursday, June 8, 2017, 2:45 p.m. - 5:00 p.m.

Fourth District Court of Appeal, 1525 Palm Beach Lakes Boulevard

2:45 - 3:00 p.m.

Late Registration/Check In

3:00 - 4:00 p.m.

This highly interactive presentation will review the steps needed to create an appealable record in a variety of situations including jury selection, evidence, directed verdicts, jury instructions, and closing argument. Bring a cell phone or other internet connected device to participate. Following the overview, a panel of appellate and trial experts will discuss the practicalities of making the record and answer your questions.

Panelists

**Donna Eng, Esq., Sue-Ellen Kenny, Esq.,
Kara Berard Rockenbach, Esq., and Rebecca Mercier Vargas, Esq.**

4:00 p.m. - 5:00 p.m.

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Equitable Liens On Homestead Property

by David M. Garten

Fla. Const. Art. X, § 4 reads in relevant part: “§4. Homestead; exemptions (a) There shall be exempt from forced sale under process of any court, and no judgment, decree or execution shall be a lien thereon, except for the payment of taxes and assessments thereon, obligations contracted for the purchase, improvement or repair thereof, or obligations contracted for house, field or other labor performed on the realty, the following property owned by a natural person: (1) a homestead...”

Where equity demands it, the courts are not hesitant to permit equitable liens to be imposed on homesteads beyond the literal language of the Florida Constitution. An equitable lien may be awarded against homestead property: (a) when the proceeds from fraudulent or reprehensible conduct are used to invest in, purchase, or improve homestead property, or (b) to **prevent unjust enrichment**. See *Havoco of Am., Ltd. v. Hill*, 790 So. 2d 1018 (Fla.2001); *Zureikat v. Shaibani*, 944 So.2d 1019 (Fla. 5th DCA 2006); *Palm Beach Savings & Loan Ass’n v. Fishbein*, 619 So. 2d 267 (Fla. 1993); *Flinn v. Doty*, 2017 Fla. App. LEXIS 3103 (Fla. 4th DCA 3/8/17).

For example, in *Fishbein*, supra a bank took a mortgage on the marital residence after the husband forged his wife’s signature on loan documents. The bank was entitled to an equitable lien against the homestead, which was awarded to the wife in the divorce decree, to the extent that the bank’s funds were used to satisfy preexisting mortgages and taxes on the property, even though the wife had not been a party to the fraud. The court determined that to hold otherwise would have given the wife a windfall of nearly one million dollars and that the homestead exemption is to serve as a shield and not a sword.

In *Jones v. Carpenter*, 90 Fla. 407, 106 So. 127 (Fla. 1925), the trustee of a bankrupt company was entitled to an equitable lien against the homestead of the company’s former president where he embezzled corporate funds to make improvements on the homestead. The Court concluded that the trustee’s claims fell within the lien exception because the funds involved in this litigation were all spent for labor and improvements on the house.

In *Craven v. Hartley*, 135 So. 899 (Fla. 1931), a lender loaned money to the buyer so that she could complete the purchase of her homestead. The buyer promised the lender that she would execute a mortgage for the loan amount. However, after the buyer secured the deed, she refused to execute the mortgage. The lender was entitled to an equitable lien against the homestead for the amount of the loan.

In *LaMar v. Lechliders*, 185 So. 833 (Fla. 1939), the Plaintiffs were entitled to an equitable lien on the homestead where they made valuable improvements to the defendant’s homestead with the understanding that they were acquiring an interest in the property.

In *Sonneman v. Tuszyński*, 191 So. 18 (Fla. 1939), plaintiff advanced the defendant money and domestic services which the defendant used to purchase and operate a tourist camp with the understanding that he would take care of the plaintiff for the remainder of her life. The defendant reneged on his promise and Plaintiff was allowed an equitable lien against the defendant’s tourist camp equal to the amount of money and

sweat equity she invested in the property.

In *Flinn v. Doty*, supra, the parents executed quit claim deeds to their daughter (“D”) on several properties. After the mother died and the father was declared incapacitated, the father’s guardian filed suit against D to recover the properties and monies she took from the sale of some of the properties, alleging both that the father had lacked mental capacity when he executed the deeds and that D had exercised undue influence over her parents in securing the properties. In one count, the guardian sought to impose an equitable lien on D’s property for the amount she used to pay off the mortgage on the property. D answered, but did not raise the fact that the property was her homestead. After a lengthy trial, the trial court found that the father lacked the capacity to execute the deeds. Among other relief, it imposed an equitable lien in the amount of \$206,000 on D’s property, i.e., the amount that she used to pay off the mortgage on her property. It also declared an equitable lien in the amount of \$185,000 for additional monies received by D from the sale of the parents’ properties. After the father died, his personal representative sought to foreclose on the equitable lien. The complaint alleged that the estate had an equitable lien in the amount of \$206,000 against D’s property. D answered and again failed to raise her homestead exemption. The court conducted a trial and entered a final judgment foreclosing liens totaling \$390,000 (the two liens combined), entered judgment for \$421,428, including interest on both liens, and set a foreclosure sale. Several days after the final judgment was entered, D moved to cancel the sale and for the first time asserted that the property was her homestead. The court denied the motion, and D appealed.

On appeal, D alleged that the court erred in imposing an equitable lien on her homestead as it is exempt from forced sale pursuant to under Article X, section 4, of the Florida Constitution. The appellate court, citing *Fishbein*, supra, held that the lower court did not err in foreclosing on the equitable lien of \$206,000 because it was imposed to prevent unjust enrichment by D, who used the proceeds of the sale of her parents’ property to pay off her pre-existing mortgage on her home. In response to D’s argument that there still must be a showing of egregious conduct on her part, the court held that *Fishbein* clearly rejects such a finding and that **unjust enrichment is sufficient in these circumstances to permit an equitable lien against her homestead**. However, the lower court did err in including the \$185,000 lien as part of the foreclosure proceeding. First, the complaint did not seek to impose a lien against D’s home; it only alleged that it was entitled to enforce the \$206,000 lien. And second, the \$185,000 lien did not satisfy any pre-existing obligations on the home. In fact, it appears to be unrelated to the home. Therefore, the court held that it could not be imposed under *Fishbein*.

Practice Pointer: In *Havoco of Am., Ltd. v. Hill*, the Florida Supreme Court re-affirmed its limitation on the exception allowing an equitable lien on homestead to those cases where the owner of the property used the proceeds from **fraud or reprehensible conduct** to either invest in, purchase, or improve the homestead. Therefore, if your client intends to pursue an equitable lien on homestead property, he/she should allege some facts in support of fraudulent or reprehensible conduct used to invest in, purchase, or improve homestead property.

Welcome New Members!

The following represents each new member's name, law school, date of admission to The Florida Bar, and law firm association.

Jacqueline A. Bain: State University of N.Y, 2008, Delray Beach

Pamela Buchmeyer: Affiliate Membership, Palm Beach Gardens

Paul E. Carson: Brooklyn Law School; 2016; Office of Criminal Conflict, West Palm Beach

Luis Cartaya: University of Louisville, 2013; Associate in Weisberg and Associates, Boca Raton

Katrina Castillo: Valparaiso University, 2013; Department of Children and Families, West Palm Beach.

Shane A. Chernoff: Florida State University, 2016; Associate in Wicker, Smith, O'Hara, McCoy, & Ford, P.A., West Palm Beach.

Clara Crabtree Ciadella: University of Florida, 2013; Associate in Ciklin Lubitz & O'Connell, West Palm Beach.

R. Scott Clayton: Florida Coastal University, 2004; Associate in Conroy Simberg, West Palm Beach.

Thomas J. Cunningham: DePaul University, 1993; Associate in Locke Lord, LLP, West Palm Beach.

Stephanie Alexandra Eady: UCLA, 2014; Associate in Jones, Foster, & Stubbs, P.A., West Palm Beach.

Leeza Danielle Gotkin: Nova Southeastern University, 2014; Associate in Ciklin Lubitz & O'Connell, West Palm Beach.

Derek Harris: Georgetown University, 2002; Associate in Carlton Fields, P.A., West Palm Beach.

Joshua L. Heller: Stetson University, 2015; Associate in Gordon & Doner, P.A., Stuart.

Cassandra Ashley Jelincic: Louisiana State University, 2013; Associate in Ciklin Lubitz & O'Connell, West Palm Beach.

Milana Kamenezki: Florida Coastal University, 2016; Associate in Derrevere, Stevens, Black and Cozad, West Palm Beach.

Scott Allan Kantor: Nova Southeastern University, 2010; Associate in Roberts, Reynolds, Bedard & Tuzzio, West Palm Beach.

Riley Kennedy: University of Florida, 2016; Associate in Adams, Coogler, Watson West Palm Beach

Russell A. Kerr Russell: University of Baltimore, 2002; Kerr, P.A. Solo Practitioner, Juptier

Michael Kessler: Marquette University, 2015; Associate in Cole, Scott & Kissane, P.A. West Palm Beach.

Sarah Nall: Florida State University, 1983; Solo Practitioner, Jupiter

Aaron M. Papero: Nova Southeastern University, 2008; Associate in Roberts, Reynolds, Bedard & Tuzzio, West Palm Beach.

Olga Patterson: Florida Registered Paralegal Membership, West Palm Beach.

Cristina Luiza Sabbagh: Nova Southeastern University, 2015, Associate in Schlesinger Law Offices, P.A., Ft. Lauderdale.

Erica Lester Sadowski: Washington University, 2004; Of Counsel, Mrachek, Fitzgerald, Rose, West Palm Beach.

Thomas Slaughter: Florida Coastal University, 2012; Associate in Cole, Scott & Kissane, P.A., West Palm Beach.

Ivan Tarasuk: Nova Southeastern University, 2005; Associate in Cole, Scott & Kissane, P.A. West Palm Beach.

Richard L. Thayer: Law Student Membership, Royal Palm Beach.

Jodi-Ann Tillman: Nova, Law Student Membership, Ft. Lauderdale

Dominique J. Torsiello: University of Florida, 2016; Associate in Chapman Law Group, Wellington

Lawrence M. Weisberg: University of Miami, 1992; Partner in Weisberg and Associates Boca Raton



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Law Week 2017 – Thank You Volunteers!



Mariano Garcia spoke to a group of 4th graders at Belvedere Elementary School, 90% of whom learned English as a second language, about coming to the USA for a better life, furthering their education and pursuing a profession.



Law Week concludes with a busy five days including two full days of Shadow A Judge and 39 volunteers visiting elementary, middle and high school classes throughout the county.

High school seniors from Inlet Grove High School participated in Shadow A Judge. Part of their visit to the Courthouse included watching closing arguments on a trafficking in drugs and resisting arrest without violence case.



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The Business Litigation CLE Committee of the
Palm Beach County Bar Association
presents:



LLC Member Disputes

Friday, June 16, 2017, 8:30a.m. - 1:30p.m.

LOCATION: Fourth District Court of Appeal, 1525 Palm Beach Lakes Blvd, West Palm Beach

- 8:30a.m. - 8:35a.m. **Welcome and Introductions:** Kent Frazer, Esq., Akerman, Chair, Business Litigation CLE Committee
- 8:35a.m. - 9:10a.m. **Rights and Duties of Managers and Members in LLC Member Disputes:** Adam Rabin, McCabe Rabin, P.A., Board Certified in Business Litigation
- 9:10a.m. - 9:45a.m. **Litigation & Remedies in LLC Disputes:** Joseph Galardi, Esq., Beasley Kramer & Galardi, P.A.
- 9:45a.m. - 10:00a.m. **Break**
- 10:00a.m. - 10:35a.m. **Key Issues and Clauses in LLC Operating Agreements:** James Dodrill, Esq., James Dodrill, P.A.
- 10:35a.m. - 11:10a.m. **Appraisal Rights and Valuing a Minority Member's Interest** Christopher Kammerer, Esq., Kammerer Mariani PLLC
- 11:10a.m. - 11:45a.m. **Taking and Defending the Corporate Representative Deposition of an LLC** Joanne O'Connor, Jones Foster Johnston & Stubbs, P.A., Board Certified in Business Litigation
- 11:45a.m. - 11:55a.m. **Working Lunch**
- 11:55a.m. - 12:30p.m. **Professionalism Expectations and Contentious Cases:** D. Culver "Skip" Smith, III, Culver Smith, III, P.A.
- 12:30p.m. - 1:30p.m. **Judicial Panel:** Fourth DCA Judge Jeffrey Kuntz; 15th Judicial Circuit Judge Meenu Sasser and 15th Judicial Circuit Judge Jeffrey Gillen. Moderator: Kent Frazer, Chair, Business Litigation CLE Committee.

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(6.16 Business Lit seminar)



The Business Litigation Committee of the
Palm Beach County Bar Association
presents:



E-Discovery Cost Shifting

Thursday, June 29, 2017, 11:30 a.m. - 1:00 p.m.

Fourth District Court of Appeal, 1525 Palm Beach Lakes Blvd., West Palm Beach

11:30 a.m. - 11:55 a.m.

Late Registration / Lunch

11:55 a.m. - 12:00 p.m.

Welcome and Opening Remarks

Kent Frazer, Esq., Akerman; Business Litigation CLE Chair

12:00 p.m. - 1:00 p.m.

Guest Speaker: Gregory S. Weiss, Esq.,

Mrachek, Fitzgerald, Rose, Konopka, Thomas & Weiss, P.A.

- **2012 E-Discovery Amendments to Florida Rules of Civil Procedure**
- **Case Law Interpreting Florida E-Discovery Amendments**
- **Federal Rules Addressing E-Discovery**
- ***Zubulake*: Landmark Decision in the Area of E-Discovery**
- **Cost-Shifting Pursuant to Federal Rules**
- **Florida Post-*Zubulake***
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The Bankruptcy CLE Committee of the Palm Beach County Bar Association
Presents

**FROM THE HORSE'S (ER, JUDGE'S) MOUTH:
AN AFTERNOON WITH THE HONORABLE ERIK P. KIMBALL
UNITED STATES BANKRUPTCY JUDGE FOR THE SOUTHERN DISTRICT OF FLORIDA**



Thursday, June 1, 12:30 p.m. - 6:00 p.m.
Fourth District Court of Appeal, 1525 Palm Beach Lakes Blvd, West Palm Beach



- 12:30 p.m. – 12:55 p.m. Lunch / Check In / Registration
- 12:55 a.m. – 1:00 p.m. Welcome: Eric Rosen, Esq., Bankruptcy CLE Committee Chair
- 1:00 p.m. – 1:50 p.m. Put Your Best Foot Forward: How to Educate Your Judge
- 1:50 p.m. – 2:40 p.m. Technology Now: How to Get Large Amounts of Evidence Kept In Electronic Format Before The Court, Confidentiality, Redacting, etc.
- 2:40 p.m. – 2:50 p.m. Break
- 2:50 p.m. – 3:40 p.m. Evidentiary Hearings/Trials: Local Rules, Conferring With Counsel, "The Rule", Evidence and Ethical Considerations
- 3:40 p.m. – 4:30 p.m. Houston, We Have A Problem: Motions To Recuse/Disqualify
- 4:30 p.m. - 5:00 p.m. Question and Answer Session
- 5:00 p.m. - 6:00 p.m. Reception

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(6.1 Bankruptcy seminar)



Brunner is Forward Looking (so to speak)

by Jason S. Rigoli

Student debt is not dischargeable by an individual in bankruptcy with one very narrow exception where the debtor can show an “undue hardship” resulting from repayment of the student loans. 11 U.S.C. § 523(a)(8). “Undue hardship” is not defined in the Bankruptcy Code, however, the majority of courts, including the Eleventh Circuit¹, have adopted the test set forth in *Brunner v. New York State Higher Educ. Svcs. Corp.*, 831 F.2d 395 (2d Cir. 1987) (the “Brunner test”), which is:

- 1) That the debtor cannot maintain, based on current income and living expenses, a “minimal” standard of living for herself and her dependents if forced to repay the loans;
- 2) That additional circumstances exist indicating that this state of affairs is likely to persist for a significant portion of the repayment period of the student loans; and
- 3) That the debtor has made good faith efforts to repay the loans.

Brunner, at 396.

In *ECMC v. Acosta-Conniff* (*In re Acosta-Conniff*), the Eleventh Circuit, among other issues, addressed the “time periods” the three prongs of the *Brunner* test consider: (1) the first prong looks at the debtor’s current ability to pay; (2) the second prong looks to the debtor’s ability to repay the student loans in the future; and (3) the debtor’s past conduct to determine whether the debtor has manifested a good faith effort to repay the loans. Case No. 16-12884, – Fed.Appx –, 2017 WL1396164 *1 (11th Cir. April 19, 2017).

¹ See *Helman Ins. Corp. v. Cox* (*In re Cox*), 338 F.3d 1238, 1241–42 (11th Cir. 2003).

Acosta-Conniff focuses on the second prong, *Id.* at *2, where the District Court reversed the Bankruptcy Court’s decision discharging the student debts and focusing on facts other than the future ability to repay the loans. Concentrating on the District Court’s opining that “Conniff has only herself to blame for incurring student debt in the pursuit of multiple degrees that she should have known would not lead to an increase in income sufficient to cover the debt”:

Although she is not satisfied with the pay the advanced degrees ultimately have yielded, Conniff chose to earn four degrees, funded primarily by student loans, in her preferred career path of education with a general understanding of the benefits she would obtain from the degrees versus the costs. She admits specifically that she decided to obtain another student loan to earn her pinnacle Ph.D in special education and agreed to repay it, knowing how the cost of the Ph.D compared with the increase in pay it would provide. (Doc. #2-11, at 31.) Conniff finds herself in circumstances largely of her own informed decision-making, which although not dispositive, is a consideration. See *In Re Brightful*, 267 F.3d at 328.

Acosta-Conniff, at *3 (quoting District Court opinion, Case Nos. 2:15-cv-00220-WKW, 2:12-bkc-31448-WRS).

The Eleventh Circuit held that the recklessness or foolishness in a debtor obtaining student loans is not a factor in the analysis under the second prong. *Acosta-Conniff*, at *3.

The opinion addresses several other issues as well, including the applicable standard of review in appeals under the

Brunner test which is a mixed question of law and fact: (1) “[a] bankruptcy court’s findings as to each of the three prongs of the *Brunner* test are factual findings that should be reviewed by the district court for clear error; not under a *de novo* standard of review; (2) [b]y contrast, a bankruptcy court’s interpretation of any legal question pertinent to its fact finding, including whether or not a debtor is entitled to discharge based on its findings as to the three Brunner prongs, is a legal conclusion subject to *de novo* review.” *Id.* at *2.

The Eleventh Circuit vacated the district court’s opinion and remanded for further review consistent with the circuit court’s opinion. However, the circuit court noted that the district court may remand down to the bankruptcy court for further findings of fact as the bankruptcy court’s opinion was lacking sufficient detail regarding several issues in the case. This is an important case to watch regarding the future application of *Brunner* in this circuit.

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The PBCBA's first Cannabis Law Summit

April 20, 2017





Retention of Foreign Body

by Ted Babbitt

Florida Statute 766.102(3)(b) states:

The discovery of the presence of a foreign body, such as a sponge, clamp, forceps, surgical needle, or other paraphernalia commonly used in surgical, examination, or diagnostic procedures, shall be prima facie evidence of negligence on the part of the health care provider.

The Supreme Court of Florida in *Dockswell v Bethesda Memorial Hospital, Inc.*, 210 So. 3d 1201 (2017) was faced with an opinion in the Fourth District Court of Appeal in *Dockswell v. Bethesda Memorial Hospital, Inc.*, 177 So. 3d 270 (Fla. 4th DCA 2015) in which the Fourth District Court of Appeal held that when evidence of direct evidence exists the plaintiff is not entitled to the presumption of negligence in the above-quoted statute.

The case arose in Palm Beach County when a nurse attempted to remove a drainage tube from the plaintiff and it was later discovered that four and a quarter inches of the tube was inadvertently left in the plaintiff's body.

After the foreign body was discovered, suit was filed alleging that the nurse who removed it was negligent in removing it too quickly and in the failure to measure it after removal in order to discover the missing section.

At the charge conference the plaintiff sought the giving of Florida Standard Jury Instruction 403.4c which provides:

[Negligence is the failure to use reasonable care.] The presence (name of foreign body) in (patient's) body establishes negligence unless (defendant(s)) prove(s) by the greater weight of the evidence that [he] [she] [it] was not negligent.

The trial court found that the instruction was inapplicable, reasoning that because plaintiff was able to identify the person who left the foreign object

inside the plaintiff's body, the instruction was inapplicable.

The trial court also found that because the above statute uses the words "the discovery" it implies a situation where the plaintiff is unable to identify who had committed the tort.

After a verdict for the defendant, the plaintiff appealed to the Fourth District Court of Appeal which affirmed the trial court's finding that neither the statute nor the instruction applied.

The Fourth District Court of Appeal found that the statute was a codification of the doctrine of *res ipsa loquitur* which did not apply when direct evidence of negligence exists.

The Supreme Court reversed at Page 1205. The Court held

The issue in this case involved the interpretation of the foreign-body presumption, as codified in section 766.102(3)(b), specifically whether, in a medical malpractice case involving a foreign body left in a patient, the burden of proof shifts to the defendant to provide that no medical negligence occurred. We conclude that, unlike the common law doctrine of *res ipsa* where direct evidence of negligence may defeat its application, the only prerequisite to applying the foreign-body presumption and Instruction 402.4c is the "discovery of the presence of a foreign body" in the patient's body. § 766.102(3)(b), Fla. Stat.

While the Fourth District relied upon an analogy to the doctrine of *res ipsa loquitur* requiring its exclusion when the existence of direct evidence is presented, the *Supreme Court in South Florida Hospital Corp. v. McCrea*, 118 So. 2d 25 (Fla. 1960) held that evidence of direct negligence does not preclude the application of the doctrine of *res ipsa loquitur*.

In *Dockswell, supra*, the Supreme Court finds that in any foreign body

case, regardless of the existence or lack of existence of negligence, the statutory presumption exists.

Notwithstanding whether the trial court or Fourth District were correct to conclude that direct evidence of negligence existed, it is clear that the drainage tube fragment was not intended to remain in Mr. Dockswell and was, therefore, a foreign body within the meaning of section 766.102(3)(b). And the injuries caused by its existence were not within the scope of treatment. *See Kenyon*, 756 So. 2d at 136-37; *Borghese*, 402 So. 2d at 475. Therefore, as we explained above, the foreign-body presumption and Instruction 402.4c were applicable to Dockswells' case as a mandatory presumption, unavoidable by evidence. Thus, the jury should have been instructed to determine whether Bethesda Memorial Hospital sufficiently refuted the presumption of negligence, as provided by section 766.102(3)(b).

This case clarifies the application of the foreign body presumption contained within Fla. Stat. 766.102(3)(b) and resolves any conflict relative to its use and the use of the accompanying instruction 402.4c in all foreign body cases.

Law Day Softball

Dennis Koehler Annual Judges vs Lawyers Softball Game

13 – 8

The lawyers pull off another victory by scoring 5 more runs than the judges during our annual Dennis Koehler Judges vs Lawyers Softball game. The friendly match was recently held at Mirasol Park in Palm Beach and included lunch sponsored by Lesser, Lesser, Landy and Smith and Peterson Bernard Attorneys at Law. And, best of all, no one was sent to the emergency room!



Magistrate Sara Alijewicz and (ret) Judge Richard Wennet were on the injured list



Front left to right: Jacob Noble, Brian Balaguera, Judge Kirk Volker, Judge Lou Delgado and Scott Wartman
Standing left to right: Bill Pruitt, Braedyn Pruitt, Sara Alijewicz, Jeff Martz, Judge James Martz, Judge Richard Offedal, Carl Cascio, Dalida Lalor, Chief Judge Jeffrey Colbath, Heather Wallace-Bridwell, Tanique Lee, Chad Hastings, David Prather and Judge Frank Castor



Brian Balaguera



Judge Kirk Volker



David Prather



Scott Wortman

A special "thank you" to
our Law Week Chairperson
Heather Wallace-Bridwell
(pictured with her daughter)

YLS Go-Green Happy Hour

Our Young Lawyers hosted its Happy Hour this month at Busch Wildlife Sanctuary in Jupiter. The purpose for the event was to promote the Young Lawyers new recycling project. Stop by the Bar Office with old inkjet cartridges, video games, cell phones, digital cameras, kindles, iPods and any other small electronics you may no longer use.



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Vote from May 22 to June 12, 2017

Ballots from the "Election Services Co." will be sent to your email May 22.
Some lawyers will also receive a paper ballot.

Law Day Luncheon Speaker Recounts Her Years in Prison

Amanda Knox took the stage and captivated the ears of nearly 300 members during our annual Law Day Luncheon held at the Embassy Suites Hotel in West Palm Beach. You could hear a pin drop as Knox spoke of her 4 years being locked up in an Italian prison for the murder of her roommate. A crime she did not commit.



Jason Weiss and Judge Daliah Weiss



PBCBA President John Whittles and Amanda Knox



Gael Beriro and Eric Christu



Amanda graciously signed her books for members who won them as door prizes



Jon Mann and Grace Streicher



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HEARSAY



Rosenthal, Levy, Simon & Ryles announces that **Jonathan Levy** was selected by his peers for inclusion in the 2017 Super Lawyers list.



Jones, Foster, Johnston & Stubbs, P.A. announces that **David E. Bowers** received the Gerald T. Hart Outstanding Tax Attorney of the Year Award at the annual meeting of The Florida Bar Tax Section at the Breakers Hotel in Palm Beach



Palm Beach attorney **Carl Domino** has been reappointed by The Florida Bar to a three-year term on the board of The Florida Bar Foundation, a statewide charitable organization whose mission is to provide greater access to justice.



Gunster, is pleased to announce that on March 31 shareholder **Gregor J. Schwinghammer** was reappointed by Gov. Rick Scott to the Judicial

Nominating Commission for the 15th Judicial Circuit, serving Palm Beach County. His current term runs from March 31, 2017, through July 1, 2020.



Cohen Milstein is proud to announce that attorney **Michael Dolce** received a surprise and unannounced award for his “Dedicated Service and Commitment to Promoting Independence for People with Disabilities through Advocacy and Victim Support Services.”





PALM BEACH COUNTY BAR ASSOCIATION

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CALENDAR June 2017

Thursday, June 1

12:30pm – 05:30pm

Bank Seminar

4th DCA

Saturday, June 3

6:00pm – 9:00pm

Legal Aid Pro Bono

Recognition

Tuesday, June 6

7:30am – 8:00am

UMC Coffee

with the Judges

North End Cafeteria

Wednesday, June 7

Worker's Comp Seminar

4th DCA

Wednesday, June 7,

12:00pm – 1:00pm

Professionalism

Committee Meeting

Akerman LLP 777 South

Flagler Drive, Suite 100

Thursday, June 8

3:00pm – 5:30pm

Appellate Seminar

4th DCA

Friday, June 9,

Community Law Seminar

4th DCA

Saturday, June 10

YLS Fishing Tournament

Palm Beach Yacht Club

Tuesday, June 13

12:00pm – 1:00pm

YLS Board Meeting

Thursday, June 15

12:00pm – 12:30pm

Professionalism

Committee Meeting

Thursday, June 15

5:30pm – 7:00pm

YLS Happy Hour

Friday, June 16

8:30am – 12:30pm

Business Litigation Seminar

4th DCA

Saturday, June 17

7:00pm – 11:30pm

Installation Banquet

Breakers Hotel

Monday, June 19

12:00pm – 1:00pm

Committee Chair

Planning Meeting

515 Flagler Dr.

Monday, June 19

12:00pm – 1:00pm

CDI Meeting

Planning Meeting

515 Flagler Dr.

Wednesday – Saturday

June 21-24

Annual Florida Bar

Convention

Boca Raton Resort & Club

Wednesday, June 21

11:45am – 1:00pm

FAWL Membership

Luncheon

Kravis Center

Cohen Pavilion

Friday, June 23

1:00pm – 5:00pm

FBVL Meeting

Boca Raton

Tuesday, June 27

5:30pm – 7:00pm

Legal Aid Board Meeting

Legal Aid Office

Wednesday, June 28

12:00pm – 1:00pm

YLS Sidebar Series

Judge Sasser's Courtroom

Thursday, June 29

11:30am – 1:00pm

Business Litigation Seminar

4th DCA