

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

IN RE:

MV Realty PBC, LLC, *et al.*,

Debtors.

CASE NO. 23-17590-EPK

Chapter 11  
(Jointly Administered)

MV Realty PBC, LLC, *et al.*,

Plaintiffs,

v.

Office of the Attorney General State  
of Florida, Department of Legal  
Affairs, *et al.*,

Defendants.

Adv. Proc. No. 23-01211-EPK

**NOTICE OF APPEARANCE AND**  
**DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that James A. Timko, Esquire and A. Felipe Guerrero, Esquire of the firm of Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A., 420 South Orange Avenue, Suite 700, Orlando, Florida 32801, file this Notice of Appearance as counsel of record in this proceeding for Non-Party, PENNSYLVANIA ASSOCIATION OF REALTORS, and Non-Party FLORIDA ASSOCIATION OF REALTORS and pursuant to Fed. R. Bankr. P. 2002 and 9010(b) and Local Rule 2002-1, requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be provided to and served upon the following:

James A. Timko, Esq.  
A. Felipe Guerrero, Esq.  
**DEAN, MEAD, EGERTON, BLOODWORTH,  
CAPOUANO & BOZARTH, P.A.**

420 S. Orange Avenue, Suite 700  
Orlando, Florida 32801  
Phone: (407) 613-2588  
Fax: (407) 423-1831  
Primary E-mails: [jtimko@deanmead.com](mailto:jtimko@deanmead.com)  
[fguerrero@deanmead.com](mailto:fguerrero@deanmead.com)  
Secondary E-mails: [mcodek@deanmead.com](mailto:mcodek@deanmead.com)  
[smarshall@deanmead.com](mailto:smarshall@deanmead.com)

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned case and proceedings therein.

Neither this Notice of Appearance and Request for Service of Papers, nor any later appearance, pleading, claim, or suit shall waive any: (1) right to have final orders in non-core matters entered only after de novo review by a District Judge; (2) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which the Creditor are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies are expressly reserved.

Respectfully submitted,

/s/ James A. Timko, Esq.

James A. Timko, Esq.

Florida Bar No. 0088858

A. Felipe Guerrero

Florida Bar No.: 022589

**DEAN, MEAD, EGERTON, BLOODWORTH,  
CAPOUANO & BOZARTH, P.A.**

420 S. Orange Avenue, Suite 700

Orlando, Florida 32801

Telephone: 407-841-1200

Facsimile: 407-423-1831

Email: jtimko@deanmead.com

***Counsel for Pennsylvania Association of Realtors  
and Florida Association of Realtors***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served electronically through the Court's CM/ECF system upon all parties registered to receive Notices of Electronic Filing on this 2<sup>nd</sup> day of January, 2024.

/s/ James A. Timko

JAMES A. TIMKO