

**IN THE COUNTY COURT OF THE FIFTH JUDICIAL CIRCUIT
IN AND FOR MARION COUNTY, FLORIDA**

<div style="background-color: black; height: 40px; width: 100%;"></div> <div style="background-color: black; height: 40px; width: 100%;"></div> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <div style="background-color: black; height: 40px; width: 100%;"></div> <div style="background-color: black; height: 40px; width: 100%;"></div> <p style="text-align: center;">Defendants.</p>	<p>Case No.: <div style="background-color: black; width: 100px; height: 1.2em; display: inline-block;"></div></p>
--	---

**DEFENDANTS [REDACTED] AND [REDACTED]'S OFFER OF
JUDGMENT TO [REDACTED] AS TRUSTEE OF THE
[REDACTED] TRUST**

[REDACTED] (" [REDACTED] ") and [REDACTED] (" [REDACTED] "), (collectively, the "Defendants"), by and through the undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.442 and Florida Statute § 768.79, hereby serve this Offer of Judgment to Plaintiff [REDACTED] as Trustee of the [REDACTED] Trust [REDACTED] [REDACTED] (" [REDACTED] ") on the following terms and conditions:

1. This Offer of Judgment is being made by [REDACTED] and [REDACTED] to [REDACTED].
2. This Offer of Judgment is intended to fully and finally resolve all of damages, including [REDACTED]'s claimed attorneys' fees and costs, that would otherwise be awarded in a final judgment against [REDACTED] and [REDACTED] in the above-styled action in which this Offer of Judgment is served, subject to subdivision 7, below.



to Defendant ██████████ and \$44,500.00 is attributable to Defendant ██████████. Defendants shall be bound by the terms set forth in paragraph 5, above, and ██████████ shall be bound by the terms set forth in paragraphs 3, 9-10, herein.

9. To accept this Offer of Judgment, ██████████ shall follow the applicable provisions of Florida Rule of Civil Procedure 1.442(f)(1). Within five (5) business days of ██████████'s counsel's receipt of the Settlement Payment, ██████████ shall file the notice of voluntary dismissal with prejudice in accordance with Florida Rule of Civil Procedure 1.420, as stated in paragraph 3, above, providing that all parties shall bear their own attorneys' fees and costs.

10. Pursuant to Florida Rule of Civil Procedure 1.442(f), this Offer of Judgment shall be deemed rejected unless accepted by delivery of written notice of acceptance within thirty (30) days after the service of this Offer of Judgment. No oral communication constitutes an acceptance, rejection, or counteroffer of this Offer of Judgment.

Dated: August 27, 2024.

Respectfully submitted,

BARAKAT + BOSSA PLLC

Counsel for Defendants ██████████ and ██████████

2701 Ponce de Leon Blvd., Suite 202
Coral Gables, Florida 33134
Telephone (305) 444-3114
Facsimile (305) 444-3115

By: /s/ Jocelyne A. Macelloni

JOCELYNE A. MACELLONI

Florida Bar No. 92092

jmacelloni@b2b.legal

service@b2b.legal

dsimon@b2b.legal

MATTHEW AKIBA

Florida Bar No. 1031198

makiba@b2b.legal

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was served upon counsel of record for ██████████

██████████, ██████████, at ██████████ and ██████████ in accordance with

Fla. R. Gen. Prac. & Jud. Admin. 2.516, on this 27th day of August, 2024.

By: /s/ Jocelyne A. Macelloni
JOCELYNE A. MACELLONI