

In re:

ASSIGNMENT FOR BENEFIT OF
CREDITORS OF:

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

PROPER BSD, LLC, a Colorado limited
liability company

Assignor,

To:

NIR GAVRA,

Case No. 2023-018976-CA-01

Division: CA44

Assignee

PROOF OF CLAIM

TO RECEIVE ANY DIVIDEND IN THIS PROCEEDING, YOU MUST COMPLETE THIS
PROOF OF CLAIM AND DELIVER IT OT THE ASSIGNEE NO LATER THAN

OCTOBER 25, 2023

THE ASSIGNEE'S NAME AND ADDRESS ARE AS FOLLOWS:

Nir Gavra, Assignee
20900 NE 30th Avenue, Suite 514, Aventura, FL 33180

- | | | |
|----|-----------------------------------|------------------------|
| 1. | CREDITOR NAME (Your name): | Grumer Law PA |
| | ADDRESS: | 2482 Eagle Watch Court |
| | | Weston, Florida 33327 |
| | TELEPHONE NUMBER: | (954) 303-3000 |
| | E-MAIL ADDRESS: | kgrumer@grumerlaw.com |

Please be sure to notify us if you have a change of address.

2. **BASIS FOR CLAIM:**

- | | |
|---|--|
| ☐ Goods Sold | ☐ Wages, Salaries and Compensations |
| ☒ Secured Creditor (Collateral: | Proceeds of BSD Related Party Litigation) |
| ☒ Services Performed | ☐ Taxes |
| ☐ Money Loaned | ☐ Customer Deposit |
| ☐ Shareholder | ☐ Other: _____ |

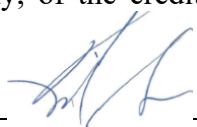
3. **DATE DEBT WAS INCURRED:** 2/2/2022 - Present

4. **AMOUNT OF CLAIM:** \$125,356.47

5. **SUPPORTING DOCUMENTS:** Attach copies of supporting documents, such as promissory notes, purchase order, invoices, itemized statement of running accounts, court judgments, or evidence of security interests. If the documents are not available, explain. If the documents are voluminous, attach a summary.

6. **SIGNATURE:** Sign and print name and title, if any, of the creditor or other person authorized to file this claim:

DATED: 9/1/2023

BY: 

Signature of Claimant or Representative

Keith T. Grumer

Print Name and Title Here

Billing history report (08/27/2023)

Moshe Mann

130114.000: General - Moshe Mann (Gruener, Keith)

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
9	Paid	02/11/2022	\$15,510.00	\$15,510.00	\$0.00	\$0.00
43	Paid	03/18/2022	\$4,305.00	\$4,305.00	\$0.00	\$0.00
115	Paid	04/22/2022	\$2,865.00	\$2,865.00	\$0.00	\$0.00
152	Paid	05/16/2022	\$3,735.00	\$3,735.00	\$0.00	\$0.00
206	Paid	06/15/2022	\$720.00	\$720.00	\$0.00	\$0.00
257	Paid	07/15/2022	\$2,441.60	\$2,441.60	\$0.00	\$0.00
339	Paid	08/19/2022	\$1,500.00	\$1,500.00	\$0.00	\$0.00
358	Paid	09/16/2022	\$2,381.60	\$2,381.60	\$0.00	\$0.00
417	Paid	10/28/2022	\$1,961.69	\$1,961.69	\$0.00	\$0.00
464	Paid	11/18/2022	\$11,880.00	\$11,880.00	\$0.00	\$0.00
522	Paid	12/16/2022	\$8,820.00	\$8,820.00	\$0.00	\$0.00
557	Paid	01/15/2023	\$5,100.00	\$5,100.00	\$0.00	\$0.00
621	Paid	02/15/2023	\$12,370.23	\$12,370.23	\$0.00	\$0.00
690	Paid	03/15/2023	\$40,032.43	\$40,032.43	\$0.00	\$0.00
731	Paid	04/14/2023	\$2,120.00	\$2,120.00	\$0.00	\$0.00
803	Past Due	05/15/2023	\$3,740.00	\$0.00	\$0.00	\$3,740.00
947	Past Due	07/14/2023	\$2,940.00	\$0.00	\$0.00	\$2,940.00
1030	Past Due	08/11/2023	\$3,075.98	\$0.00	\$0.00	\$3,075.98
					Matter Total:	9,755.98
130114.001: BSD Carter Park - Case No. 21-021177 (Gruener, Keith)						

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
10	Paid	02/11/2022	\$19,296.79	\$19,296.79	\$0.00	\$0.00
44	Paid	03/18/2022	\$30,272.25	\$30,272.25	\$0.00	\$0.00

116	Paid	04/22/2022	\$35,104.03	\$35,104.03	\$0.00	\$0.00
153	Paid	05/16/2022	\$12,666.80	\$12,666.80	\$0.00	\$0.00
207	Paid	06/15/2022	\$30,725.00	\$30,725.00	\$0.00	\$0.00
258	Paid	07/15/2022	\$17,345.00	\$17,345.00	\$0.00	\$0.00
340	Paid	08/19/2022	\$27,335.00	\$27,335.00	\$0.00	\$0.00
359	Paid	09/16/2022	\$2,460.00	\$2,460.00	\$0.00	\$0.00
418	Paid	10/28/2022	\$1,920.00	\$1,920.00	\$0.00	\$0.00
465	Paid	11/18/2022	\$2,640.00	\$2,640.00	\$0.00	\$0.00
523	Paid	12/16/2022	\$120.00	\$120.00	\$0.00	\$0.00
558	Paid	01/15/2023	\$1,020.00	\$1,020.00	\$0.00	\$0.00
948	Past Due	07/14/2023	\$300.00	\$0.00	\$0.00	\$300.00
1031	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.002: BSD Fillmore - Case No. 21-021314 (Gruener, Keith)						Matter Total: 375.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
11	Paid	03/03/2022	\$2,595.59	\$2,595.59	\$0.00	\$0.00
45	Paid	03/18/2022	\$1,108.00	\$1,108.00	\$0.00	\$0.00
117	Paid	04/22/2022	\$7,427.50	\$7,427.50	\$0.00	\$0.00
154	Paid	05/16/2022	\$3,808.70	\$3,808.70	\$0.00	\$0.00
208	Paid	06/15/2022	\$585.00	\$585.00	\$0.00	\$0.00
304	Paid	08/15/2022	\$660.00	\$660.00	\$0.00	\$0.00
360	Paid	09/16/2022	\$180.00	\$180.00	\$0.00	\$0.00
949	Past Due	07/14/2023	\$300.00	\$0.00	\$0.00	\$300.00
1032	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.003: BSD12 Hallandale - Case No. 21-021236 (Gruener, Keith)						Matter Total: 375.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
12	Paid	03/03/2022	\$5,021.09	\$5,021.09	\$0.00	\$0.00
46	Paid	03/18/2022	\$778.00	\$778.00	\$0.00	\$0.00

118	Paid	04/22/2022	\$1,505.50	\$1,505.50	\$0.00	\$0.00
155	Paid	05/16/2022	\$360.00	\$360.00	\$0.00	\$0.00
305	Paid	08/15/2022	\$900.00	\$900.00	\$0.00	\$0.00
950	Past Due	07/14/2023	\$300.00	\$0.00	\$0.00	\$300.00
1033	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.004: BSD North Federal - 21-021444 (Gruener, Keith)						Matter Total: 375.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
13	Paid	03/03/2022	\$8,655.74	\$8,655.74	\$0.00	\$0.00
47	Paid	03/18/2022	\$345.00	\$345.00	\$0.00	\$0.00
119	Paid	04/22/2022	\$820.00	\$820.00	\$0.00	\$0.00
156	Paid	05/16/2022	\$1,640.50	\$1,640.50	\$0.00	\$0.00
209	Paid	06/15/2022	\$345.00	\$345.00	\$0.00	\$0.00
306	Paid	08/15/2022	\$180.00	\$180.00	\$0.00	\$0.00
361	Paid	09/16/2022	\$180.00	\$180.00	\$0.00	\$0.00
951	Past Due	07/14/2023	\$270.00	\$0.00	\$0.00	\$270.00
1034	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.005: BSD18, LLC - 21-027928 (Gruener, Keith)						Matter Total: 345.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
14	Paid	03/03/2022	\$1,511.09	\$1,511.09	\$0.00	\$0.00
48	Paid	03/18/2022	\$419.00	\$419.00	\$0.00	\$0.00
120	Past Due	04/22/2022	\$8,460.00	\$6,703.01	\$0.00	\$1,756.99
157	Past Due	05/16/2022	\$7,603.80	\$0.00	\$0.00	\$7,603.80
210	Past Due	06/15/2022	\$3,337.00	\$0.00	\$0.00	\$3,337.00
259	Past Due	07/15/2022	\$8,795.00	\$0.00	\$0.00	\$8,795.00
307	Past Due	09/09/2022	\$16,155.00	\$0.00	\$0.00	\$16,155.00
362	Past Due	09/16/2022	\$33,522.70	\$0.00	\$0.00	\$33,522.70
419	Past Due	10/28/2022	\$5,710.00	\$0.00	\$0.00	\$5,710.00

466	Past Due	11/18/2022	\$615.00	\$0.00	\$0.00	\$615.00
524	Past Due	12/16/2022	\$450.00	\$0.00	\$0.00	\$450.00
559	Past Due	01/15/2023	\$420.00	\$0.00	\$0.00	\$420.00
130114.006: BSD PEMBROKE - Case No. 21-021694 (Gruener, Keith)						Matter Total: 78,365.49

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
15	Paid	03/03/2022	\$941.09	\$941.09	\$0.00	\$0.00
121	Paid	04/22/2022	\$644.90	\$644.90	\$0.00	\$0.00
158	Paid	05/16/2022	\$1,423.90	\$1,423.90	\$0.00	\$0.00
211	Paid	06/15/2022	\$315.00	\$315.00	\$0.00	\$0.00
308	Paid	08/15/2022	\$180.00	\$180.00	\$0.00	\$0.00
363	Paid	09/16/2022	\$180.00	\$180.00	\$0.00	\$0.00
1035	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.007: BSD Madison I and II (Gruener, Keith)						Matter Total: 75.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
16	Paid	03/03/2022	\$9,000.00	\$9,000.00	\$0.00	\$0.00
49	Paid	03/18/2022	\$22,470.00	\$22,470.00	\$0.00	\$0.00
122	Paid	04/22/2022	\$2,353.00	\$2,353.00	\$0.00	\$0.00
159	Paid	05/16/2022	\$345.00	\$345.00	\$0.00	\$0.00
309	Paid	08/15/2022	\$180.00	\$180.00	\$0.00	\$0.00
952	Past Due	07/14/2023	\$270.00	\$0.00	\$0.00	\$270.00
1036	Past Due	08/11/2023	\$75.00	\$0.00	\$0.00	\$75.00
130114.008: ST BSD, LLC v. Eli Ran CACE-22-003558 (Gruener, Keith)						Matter Total: 345.00

Invoice #	Status	Due Date	Amount	Payments	Credit Notes	Balance
123	Paid	04/22/2022	\$4,075.94	\$4,075.94	\$0.00	\$0.00
160	Paid	05/16/2022	\$2,894.50	\$2,894.50	\$0.00	\$0.00

212	Paid	06/15/2022	\$1,305.00	\$0.00	\$0.00
364	Paid	09/16/2022	\$1,560.00	\$0.00	\$0.00
953	Past Due	07/14/2023	\$270.00	\$0.00	\$270.00
1037	Past Due	08/11/2023	\$75.00	\$0.00	\$75.00
Matter Total:					345.00
Client Total:					90,356.47
Total:					90,356.47

Grand Totals

Amount:
Payments:
Credit Notes:

\$480,600.94
\$390,244.47
\$0.00

Balance:

\$90,356.47

+ 20,000.00

Advances to
M. Mend

work in progress

+ 15,000

\$125,356.47