

In re:

ASSIGNMENT FOR BENEFIT OF CREDITORS
OF:

PROPER BSD, LLC, a Colorado limited liability
company

Assignor,

To:

NIR GAVRA,

Assignee,

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

Case No. 2023-018976-CA-01
Division: CA44

AMENDED OBJECTION TO CLAIMS OF BSD CARTER PARK CLAIMANTS

Through this Amended Objection, the Assignee is objecting to the proofs of claim filed by the following claimants related to investments in BSD Carter Park, LLC (the “BSD Carter Park Claimants”)

- | | |
|-------------------------|------------------------------------|
| 1) Nadav Lev | 14) Elizabeth Becker |
| 2) Dvir Birger | 15) Natan Ben Zvi |
| 3) Moshe Deckter | 16) Erez Levy |
| 4) Daniel& Orly Zanzuri | 17) Eli Mizrahi |
| 5) Itay Morag | 18) Amnon & Aynat Schur |
| 6) Or Tzion Gamliel | 19) Kobi Boaron |
| 7) Diana Becker | 20) Robert Rath |
| 8) Ofek Ashkenazy | 21) Gavriel Engel |
| 9) David Aboudi | 22) Haim Dahan |
| 10) Dael Levy | 23) Yosi Lechiani & Yaakov
Levi |
| 11) Ori Shoshani | 24) Naomi Wertheimer |
| 12) Gilad Rozenberg | |
| 13) Hagit& Harel Avrech | 25) Yuval Shvartsman |
| | 26) Naama Meyer |
| | 27) Moshe Buch |
| | 28) Jacob Gat |

NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST A HEARING

TO CREDITORS AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that, pursuant to s. 727.113, Florida Statutes, Nir Gavra, Assignee for Proper BSD, LLC files this Objection to Claim of the above-listed BSD Carter Park Claimants on negative notice.

The Court may consider the Objection without further notice or hearing unless a party in interest files an objection within 21 days from the date this paper is served.

If you object to the relief requested in this paper, you must file your objection with the Clerk of the Court at 73 West Flagler Street, Miami, FL 33301 and serve a copy on the Assignee's attorney, Michael S. Hoffman, Esq., 909 North Miami Beach Boulevard, Suite 201, North Miami Beach, FL 33162 and mshoffman@hlalaw.com and any other appropriate person.

If you file and serve an objection within the time permitted, the objection shall be set for hearing. If you do not file an objection within the time permitted, the Assignee and the Court will presume that you do not oppose the granting of the relief requested in the paper and an order may be entered without a hearing.

Nir Gavra (the "Assignee"), as assignee for the benefit of creditors of Proper BSD, LLC (the "Assignor"), by and through undersigned counsel and pursuant to Section 727.113 objects to the Proof of Claim of the above listed BSD Carter Park Claimants and states:

1. Prior to the Petition Date, the principal owners and operators of the Assignors were individuals named Moshe Mann ("Mann") and Moshe Friedman ("Friedman"). Mann and Friedman raised money from individuals in Israel to invest in Florida real estate projects.

2. The investments were generally structured as follows: Israeli investors (the "Investors") entered into partnership agreements with Mann and Friedman's Israeli based entity M.A.M Real Estate Initiation Investments, LTD ("MAM"). The partnerships gave the investor rights to profits and incomes generated from an identified real estate project in Florida. Friedman and Mann used the funds to acquire partial interests in Florida limited liability companies that owned and operated Florida real estate. The membership interests in these entities were held

either by Mann individually or by a Florida entity owned by Mann named S T BSD, LLC (“ST BSD”).

3. The partnerships then entered into agreements with the Assignor pursuant to which the Assignor would manage the investors interests and disburse profits and incomes. Upon receipt of funds, the Assignor would therefor incur obligations to the Israeli partnerships.

4. In relevant part, Mann and Friedman used the Israeli investor funds to acquire interests in the following Florida limited liability companies (the “Florida LLCs”): BSD Viewmax, LLC, BSD 18, LLC, BSD Hallandale, LLC, BSD North Dixie, LLC, BSD North Federal, LLC, BSD Carter Park, LLC, BSD12 Hallandale, LLC, and BSD Madison, LLC.

5. In 2021 disputes arose between Mann and Ran concerning the management of the Florida LLCs. Mann filed a series of lawsuits against Ran in Broward County Circuit Court.

6. On January 31, 2023, Mann, Ran and other interested parties entered into a Settlement Agreement and Full and Final Release of Claims (the “Settlement Agreement”) to settle all disputed matters between them. Under the terms of the Settlement Agreement, the real estate owned by the Florida LLCs was to be sold and the proceeds to be distributed to Mann, ST BSD, Ran and the other equity partners according to an agreed formula. The Settlement Agreement further resolved disputes related to the various parties’ capital contributions and loans and provided for payment of various management fees and commissions to Ran and Mann.

7. Following the Settlement Agreement, Mann and/or ST BSD received net sale proceeds of \$ \$1,347,672.91 from the liquidation of BSD Carter Park LLC. From this amount, BSD Carter Park Claimants were paid \$971,878, representing . Each BSD Carter Park Claimant has a claim for its proportional share of the remaining \$375,794.91.

8. The Assignee objects to each of BSD Carter Park Claimants claims to the extent

that it exceeds the amount that would have been received by such Claimant had the Assignor distributed the proceeds of BSD Carter Park proceedings in accordance with the Assignor's agreements with MAM.

9. Attached as Exhibit A is a calculation detailing the name of each BSD Carter Park Claimant, the percentage of the total investments of each BSD Carter Park Claimant in BSD Carter Park, LLC and the proposed allowed claim for each BSD Carter Park, LLC claimant in this assignment for the benefit of creditors proceeding.

WHEREFORE, the Assignee respectfully requests that this Court enter an Order (i) sustaining this objection; (ii) allowing the claim of each BSD Carter Park Claimant in the amount set forth in the "Proposed Allowed Claim" Column in Exhibit A; and (iii) granting such other relief this Court deems just and proper.

Dated: February 19, 2025

Respectfully submitted,

/s/ Michael Hoffman

Michael S. Hoffman, Esq.

Florida Bar No. 41161

LESSNE HOFFMAN, PLLC

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EXHIBIT A: PROPOSED ALLOWED CLAIM

Name of BSD Carter Park Claimant	Share of BSD Carter Park Claimant's Investment in BSD Carter Park, LLC	Proposed Allowed Claim¹
Nadav Lev	3.87%	\$14,553.45
Dvir Birger	0.77%	\$2,910.69
Moshe Deckter	3.87%	\$14,553.45
Daniel& Orly Zanzuri	2.20%	\$8,261.41
Itay Morag	2.19%	\$8,248.27
Or Tzion Gamliel	2.32%	\$11,314.89
Diana Becker	2.24%	\$8,411.90
Ofek Ashkenazy	4.36%	\$29,106.91
David Aboudi	7.75%	\$14,883.24
Dael Levy	3.96%	\$19,285.48
Ori Shoshani	2.28%	\$8,557.43
Gilad Rozenberg	1.33%	\$4,986.30
Hagit& Harel Avrech	4.68%	\$17,580.57
Elizabeth Becker	3.87%	\$18,858.15
Natan Ben Zvi	3.30%	\$12,392.27

¹ The Proposed Allowed Claim is calculated by multiplying the share of each BSD Carter Park, LLC's Claimant's investment in BSD Carter Park, LLC by the \$375,795 remaining proceeds from the sale of BSD Carter Park LLC following the Settlement Agreement

Erez Levy	3.31%	\$16,131.64
Eli Mizrahi	7.75%	\$29,106.91
Amnon & Aynat Schur	4.84%	\$18,191.82
Kobi Boaron	1.84%	\$6,898.34
Robert Rath	3.72%	\$13,971.32
Gavriel Engel	5.41%	\$26,332.02
Haim Dahan	3.49%	\$13,098.11
Yosi Lechiani & Yaakov Levi	2.64%	\$12,857.11
Naomi Wertheimer	2.19%	\$8,240.17
Yuval Shvartsman	1.16%	\$5,547.81
Naama Meyer	7.64%	\$36,615.57
Moshe Buch	3.88%	\$18,600.31
Jacob Gat	0.77%	\$3,698.54