

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,

**AMENDED OBJECTION TO CLAIMS OF MOSHE MANN, MOSHE FRIEDMAN,
M.A.M REAL ESTATE INITIATION INVESTMENTS, LTD, AND
EMINENCE GROUP, INC. AND ASHER TUVAL CPA**

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 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 Proofs of Claim of Moshe Mann, Moshe Friedman, M.A.M Real Estate Initiation Investments, LTD, and Eminence Group, Inc., and Asher Tuval and states:

Claimant	Amount Claimed	Basis for Objection	Proposed Allowed Claim
Moshe Mann	Unknown	The Claimant does not provide a claim amount or a basis for the claim. Further, any claims of Claimant should be set off by claims Claimant owes the Assignor and/or the estate.	\$0.00. The Assignee requests this claim be disallowed in its entirety.
Moshe Friedman	Unknown	The Claimant does not provide a claim amount or a basis for the claim. Further, any claims of Claimant should be set off by claims Claimant owes the Assignor and/or the estate.	\$0.00. The Assignee requests this claim be disallowed in its entirety.
M.A.M Real Estate Initiation Investments, LTD	Unknown – the claim amount is not legible.	The Claimant does not identify the basis or calculation for this Claim. Under the Claimant's partnership agreements with Israeli investors, the Claimant only has a claim to profits. The venture did not generate profits. Additionally, the claims of MAM are duplicative of the claims filed by the Israeli investors.	\$0.00. The Assignee requests this claim be disallowed in its entirety.

Eminence Group, Inc.	\$90,000	The Assignor's books and records do not reflect this debt and the Claimant attaches no loan documents.	\$0.00. The Assignee requests this claim be disallowed in its entirety.
Asher Tuval CPA	\$33,326	The Assignor's books and records do not reflect this debt and the Claimant attaches no invoices, statements or retainer agreements.	\$0.00. The Assignee requests this claim be disallowed in its entirety.

WHEREFORE, the Assignee respectfully requests that this Court enter an Order (i) sustaining this objection; (ii) disallowing the above claims; and (iii) granting such other relief this Court deems just and proper.

Dated: January 22, 2025

Respectfully submitted,

/s/ Michael S. Hoffman
Michael S. Hoffman, Esq.
HOFFMAN, LARIN & AGNETTI, P.A.
Counsel for the Assignee
909 North Miami Beach Boulevard
Suite 201
North Miami Beach, FL 33162
T. 305.653.5555
E. mshoffman@hlalaw.com