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**MEMORANDUM**

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**TO:** Members of Mainlands Seven Maintenance Corporation, Inc.  
**FROM:** Lisa A. Magill, Esq., for the Firm  
**DATE:** July 15, 2012  
**RE:** April 5, 2012 Process Service Memorandum and Motion (aka "fake" lawsuit)

Attention Members:

Apparently there has been a lot of talk and email correspondence about documents received by the president of the association in early April of this year. These documents were ostensibly intended to convince the board of directors there was a lawsuit filed against the association to remove two members from the board.

The President provided this Law Firm with the paperwork she received. It just so happens that she received the paperwork the same day the board had a scheduled private attorney-client meeting with Attorney Jonathan Wilinsky to discuss pending collection and foreclosure lawsuits. Mr. Wilinsky only discussed the collection and foreclosure matters, he did not discuss this paperwork.

The documents received did not reflect compliance with the recall or removal procedures in the Homeowners' Association Act. We researched the court files (both at the circuit level and the county level) and found that the case number written on the paperwork was assigned to a completely unrelated litigation matter. The Broward County Clerk's Office had no information about this "lawsuit" either.

Consequently, it was not necessary for the association to take any action. It was required to file any motions with the court or engage in any litigation activities.

Later, the board was told that these documents were forged and not issued by LIS Holdings, LLC. The association received a letter from the attorney for LIS Holdings, LLC notifying it that the paperwork was fabricated and of no legal force or effect. The attorney for LIS Holdings said he was working with the sheriff's office to try to uncover the person or persons responsible for the motion and other paperwork. He asked whether the board could help identify the person or

persons responsible, since none of the members of the board of directors had any knowledge whatsoever as to who prepared those documents, this Law Firm sent a letter in response thanking him for the information and advising it could not help at that time.

The Board of Directors properly considers the "motion" and fake lawsuit matter completely closed. There is absolutely no reason to dwell on something that has no legal impact.

If anyone has any information that may help Mr. Savir in his effort to identify the person or persons responsible for these documents, please contact him or his attorney directly. It is inappropriate for the association to get involved or conduct any investigation. That task must be performed by law enforcement.

Please be reminded that the members are invited to attend all meetings of the board of directors, other than meetings between the board and its attorney to discuss pending legal matters or proposed litigation. Despite what you may have heard, there is no lawsuit against the association for a million dollars, but there is a lot of misinformation being communicated to and by members. The Board of Directors encourages you to learn the facts for yourself and not engage in back-door discussions. All association financial records, including owner delinquency records, are available for inspection by members upon notice and appointment because there is nothing to hide. The Board of Directors encourages you to participate in association operations, rather than rely on rumors.

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