



## FRAZIER & BOWLES

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*Via United States and Electronic Mail*

December 14, 2022

George Harder, Esq.  
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RE: Copper Ridge/Brandon Homeowners' Association, Inc. v. Catchings, et. al.  
Motion for Sanctions Pursuant to Fla. Stat. s. 57.105

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Mr. Harder:

Attached please find a Motion to Dismiss and Motion for Sanctions being served with twenty one (21) days notice pursuant to Fla. Stat. s. 57.105.

As you will see, you have overlooked fundamental conditions precedent and black letter law and brought claims on behalf of your client in your Counter-Complaint and Request for Damages per Fla. Stat. 720.303 despite those requirements.

This is of course after your office caused my clients to be served with a stricken pleading from a closed case. This is of course after your office had an arbitration petition *sua sponte* dismissed by the DBPR. This is after you have threatened a defamation against one of the directors for asking a question to a member which even if viewed as a statement, was a true statement and not subject to defamation liability. This is after your clients have engaged in a completely baseless smear campaign against the Association, it's management company and directors.

At some point, your clients and office need to be held accountable for the money being wasted in defense of these meritless and improperly postured claims. As such, I have attached the Motion to Dismiss and Motion for Sanctions that will be filed on January 5, 2023 if the Counter-Complaint and "Request" are not voluntarily dismissed and withdrawn respectively. Please note that such voluntary dismissal will **not** result in the Association waiving any rights to attorneys' fees collectible against your clients and secured by their homes and subject to foreclosure. It is just that

your office won't be held jointly and severally liable per statute if the claims are voluntarily dismissed as they should be.

Thank you in advance for your attention to this matter.

Sincerely,

/s/Gregory S. Grossman  
Gregory S. Grossman, Esq.  
**FRAZIER & BOWLES, PLLC**