

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

Douglas J. Von Allmen, *et al.*,

Case No.:

Plaintiffs,

v.

William R. Scherer Jr., *et al.*,

Defendants.

/

Plaintiffs' Emergency Motion to Appoint Receiver for Conrad & Scherer, LLP

Douglas J. Von Allmen (“Von Allmen”) and Linda Von Allmen, Julie Steurer and Laura Strasser as co-trustees for the Von Allmen Dynasty Trust (collectively, the “VA Trustee”) (Von Allmen and the VA Trustee are “Plaintiffs”) seek on an emergency basis an Order from this Court appointing a receiver for Conrad & Scherer. In support, Plaintiffs state the following:

Introduction

Conrad & Scherer, LLP (“Conrad & Scherer”) borrowed \$25,000,000 from its client to fund the expenses incurred by the firm in the Rothstein litigation. William Scherer Jr. (“Scherer”) personally guaranteed this debt. And although the firm received tens of millions of dollars in fees for its work, somehow, under the stewardship of Scherer, the firm mismanaged its finances to the point that it still owes Plaintiffs \$19,700,000 excluding interest, attorneys’ fees, and costs.

With a flagrant and arrogant disregard for the Florida Rules of Professional Conduct, Conrad & Scherer largely drafted the documents evidencing this sizeable debt. To secure this debt, Conrad & Scherer provided Plaintiffs a security interest in its only meaningful asset: all of the firm’s accounts receivable. The firm also acknowledged multiple times in the documents it drafted and executed that this debt was not, and is not, subject to, claim, setoff, or defense. Even

PERLMAN, BAJANDAS, YEVOLI & ALBRIGHT, P.L.

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