

**Florida Real Property and Business Litigation Report**  
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**Manuel Farach**

**City of Chicago v. Fulton**, Case No. 19–357 (2021).

The mere retention of estate property after the filing of a bankruptcy petition does not violate the automatic stay under 11 U.S.C. §362(a)(3) of the Bankruptcy Code.

**United States of America ex rel Bibby v. Mortgage Investors Corporation**, No. 19-12736 (11th Cir. 2021).

The False Claims Act, 31 U.S.C. § 3729(a)(1)(A)–(B), does not impart standing Article III to claimants seeking avoidance of fraudulent claims.

**R.J. Reynolds Tobacco Company v. Bessent-Dixon**, Case No. 1D19-1995 (Fla. 1st DCA 2021).

A claimant seeking to prove the intentional tort of conspiracy to fraudulently conceal information must prove she relied to her detriment on a false statement by the defendant.

**Ramos v. Mississippi Real Estate Dispositions, LLC**, Case No. 3D19-2513 (Fla. 3d DCA 2021).

Despite the equitable powers granted to judgment creditors by Florida Statute section 56.29(6), a judgment creditor executing a judgment on a judgment debtor’s interest in a multi-member limited liability is constrained by Florida Statute section 605.0503 and may only levy a charging lien.

**National Medical Imaging, LLC v. Lyon Financial Services, Inc.**, Case No. 3D20-730 (Fla. 3d DCA 2021) (en banc).

The Third District recedes from *Shop in the Grove, Ltd. v. Union Federal Savings & Loan Ass’n of Miami*, 425 So. 2d 1138 (Fla. 3d DCA 1982), and holds that the automatic stay under 11 U.S.C. 362 applies even when the bankruptcy debtor is the appellant.

**Amezcua v. Cortez**, Case No. 3D20-1649 (Fla. 3d DCA 2021).

Florida recognizes international foreign judgments pursuant to Florida Statute section 55.064 while general principles of comity allow for the discretionary enforcement of certain interlocutory rulings.