

**Florida Real Property and Business Litigation Report**  
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**Behr v. Campbell**, Case No. 18-12842 (11th Cir. 2021).

The Rooker-Feldman Doctrine is narrow and applies only when a losing state court litigant calls on a district court to modify or “overturn an injurious state-court judgment”; district courts do not lose subject matter jurisdiction over a claim “simply because a party attempts to litigate in federal court a matter previously litigated in state court.”

**Maas v. HSBC Bank USA, National Association**, Case No. 2D20-253 (Fla. 2d DCA 2021).

A borrower altering an original promissory note in open court by striking through her signature is a not a clear contemptuous act and is not direct criminal contempt.

**Perez v. Jaimot**, Case No. 3D21-1302 (Fla. 3d DCA 2021).

An order of partition is final at such time as the court directs the sale of the property.

**Wells Fargo Bank, N.A. v. Electronic Funds Transfer Corporation D/B/A The EFT Network, Inc.**, Case No. 5D20-655 (Fla. 5th DCA 2021).

A party seeking to impose punitive damages on a business entity based on the actions of a managing agent must prove the agent was more than a middle-level manager or that he was a middle-level manager with more than limited managerial authority.