

**Florida Real Property and Business Litigation Report**  
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**Siegel v. Fitzgerald**, Case No. 21–441 (2022).

Congressional enactment of different bankruptcy fee structures for different states violates the uniformity requirement of the Constitution.

**Doral Collision Center, Inc. v. Daimler Trust**, Case No. 3D21-1385 (Fla. 3d DCA 2022).

The requirements of Florida Statute section 713.585 (enforcement of mechanic's lien by sale of motor vehicle) are mandatory and failure to strictly comply with the statute voids a lien claimed under the statute.

**100 Emerald Beach Way LC v. Thornton**, Case Nos. 4D20-2792 and 4D21-508 (Fla. 4th DCA 2022).

The Fourth District follows its prior precedent and holds that Florida Rule of Appellate Procedure 9.130(a)(3) authorizes review of pre-judgment contempt orders; conflict certified with the opinions of the First, Second, Third, and Fifth Districts which hold review of such orders is by certiorari.

**Lloyd S. Meisels, P.A. v. Dobrofsky**, Case No. 4D21-2397 (Fla. 4th DCA 2022).

A trial court does not abuse its discretion by treating the facts in a moving party's motion for summary judgment as undisputed when the non-moving party fails to comply with Florida Rule of Civil Procedure 1.510.