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The PDF of this week's Update can be read [here](#).

Please contact Manuel Farach at for past issues of this Update.

Cases of interest this week include:

Crusaw v. Crusaw, --- So. 3d ---- 2015 WL 7444186 (Fla. 1st DCA 2015).

A court cannot order the sale of portioned property if no party requested a sale.

Gordin v. Estate of Maisel, --- So. 3d ---- 2015 WL 7566353 (Fla. 4th DCA 2015).

A trial court cannot appoint a curator of an estate without revoking or suspending letters issued to the personal representatives.

Sanchez v. SunTrust Bank, --- So. 3d ---- 2015 WL 7568555 (Fla. 4th DCA 2015).

A witness must be familiar with how the particular business records sought to be introduced were created in order to satisfy the Business Records Exception.

Guzman v. Deutsche Bank Nat. Trust Co., -- So. 3d ---- 2015 WL 7568558 (Fla. 4th DCA 2015).

Standing is determined at time of filing suit, and an amended complaint does not relate back for standing purposes.

MIA Real Holdings, LLC v. Nolan, --- So. 3d ---- 2015 WL 7571468 (Fla. 4th DCA 2015).

An estimate prepared in anticipation of trial testimony is not a business record as it is not kept in the ordinary course of business.

Bank of New York v. Von Houtman, --- So. 3d ---- 2015 WL 7571489 (Fla. 4th DCA 2015).

A motion for attorneys' fees under Florida Rule of Appellate Procedure 9.100 (k) must be filed within twenty days after responding to a petition for original jurisdiction otherwise the claim for fees is waived.