UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

SEASCAPE OF LITTLE HICKORY ISLAND, INC.,
Plaintiff,

v.

HARTFORD INSURANCE COMPANY OF THE MIDWEST,
Defendant.

CASE NO. 2:26-cv-01330-KCD-KRH

STATE OF Florida)
)ss.:
COUNTY OF Lee)

Notary Public State of Florida
Tyler Daniel Ingram
My Commission HH 385812
Expires 4/12/2027

DECLARATION OF RON GEORGE

Pursuant to 28 U.S.C. 1746, I, Ron George, declare, under the penalty of perjury that the following are true and correct:

1. I am over the age of eighteen; I am competent to testify to the matters contained herein, which I offer as testimony based upon my personal knowledge and upon a review of the files of Seascape of Little Hickory Island, Inc. ("Seascape")

2. I am the President of the Board of Directors of Seascape of Little Hickory, Inc. I have been the President since approximately the fall of 2021 and was the President at the time of Hurricane Ian and its aftermath.

3. I provide this declaration for the limited purpose of responding to the Motion to Dismiss filed by Hartford Insurance Company of the Midwest in the

above action, and it does not contain all information I may have regarding the Hurricane, the damage, or the insurance claim.

4. My counsel has provided me three letters, each addressed to "SEASCAPE OF LITTLE HICKORY" and dated June 11, 2023, June 17, 2023, and June 18, 2023. Copies of these letters are attached here as Exhibits A, B, and C.

5. Prior to my counsel showing me these letters in July 2026, I had never seen them.

6. I have reviewed, and directed Seascape's property manager to review, the files held by Seascape and have not found any of these letters in our files.

7. During this claims period, we worked closely with a public adjuster, Dennis Niland, associated with a company called Swerling Milton Winnick.

8. Any time the Association would receive correspondence relating to the claim, it would be sent to him and myself.

9. We have reviewed records of emails during the June and July 2023 period and found no evidence that these letters were ever emailed to Mr. Niland. If we had received them, they would have been scanned and immediately sent to Mr. Niland.

10. In fact, not long after these letters were purportedly sent, we received checks relating to the claim. These were scanned and immediately sent to Mr. Niland.

11. I can state confidently that the Association never received these letters. Accordingly, we dispute the authenticity of these documents.

12. I do not know, and cannot know, whether the letters were sent. We would have preserved them and sent copies to Mr. Niland had we received them.

13. Although only speculation, I note that in the wake of Hurricane Ian, mail service in the areas affected by the Hurricane was massively disrupted.

14. For years, mail was not actually delivered to Seascape. It was only in approximately early 2025 that regular and reliable mail service resumed (and it remains imperfect). During the 2023 period, mail would be held at the Post Office and picked up periodically. But if "Manager" or similar was not identified as the recipient of the mail, it may not have made it to us.

15. To summarize, the plaintiff insured (Seascape of Little Hickory) never received the documents attached as Exhibits A, B, and C. We have reviewed our records and confirmed they are not in those records. We have also reviewed contemporaneous email correspondence and found that they were never provided to our public adjuster, which would have occurred as a matter of course had they been receipt.

Under penalty of perjury, I declare that I have read the foregoing Declaration and all referenced documents therein and that the facts stated in them are true.

Ron George 17 Aug 2026

Ron George

Notary Public State of Florida
Tyler Daniel Ingram
My Commission HH 385812
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