

# Real Property, Financial Services, & Title Insurance Update: Week Ending June 11, 2021

June 11, 2021

## Real Property Update

- **Residential Landlord-Tenant / Non-Payment of Rent:** Landlords' counterclaim for non-payment of rent in action brought by tenants was not barred by res judicata or the rule against splitting causes of action because landlords could not have brought such a claim in their prior summary eviction action - [Amiri v. McGreal](#), No. 2D20-953 (Fla. 2d DCA June 11, 2021) (reversed and remanded)
- **Foreclosure / Post-Bid Objections:** Borrowers' post-sale objections to judicial foreclosure sale were facially deficient - [Volynsky v. Park Tree Invs. 21, LLC](#), No. 3D19-2197 (Fla. 3d DCA June 9, 2021) (affirmed)

## Financial Services Update

No cases of interest to report.

## Title Insurance Update

No cases of interest to report.

## Related Practices

[Real Property Litigation](#)

[Consumer Finance](#)

[Title Insurance](#)

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