



# Christopher M. Paolini

SHAREHOLDER

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CONNECT

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## Overview

Chris Paolini is a trial attorney who represents property owners, insurers, local governments, businesses, lenders, and loan servicers in a wide range of matters that impact his clients' core operations. He litigates contract, tort, and statutory claims in federal and state court arising from property ownership and acquisition, property insurance, and enforcement of security interests. He also provides counsel in connection with contract risk, preparation, and enforcement.

Additionally, Chris handles unfair trade practice claims, foreclosures, premises liability disputes, first party and statutory bad faith insurance claims, and consumer protection matters, including federal TCPA, FDCPA, TILA, RESPA, FCRA, and RICO actions, as well as claims brought under statutory state law counterparts. He has tried jury and nonjury cases to verdict and final judgment.

## Experience

- Represented the lender of a \$15 million loan in a commercial foreclosure involving a failed planned development. Successfully obtained an injunction preventing the borrower from committing waste to the lender's collateral, an order appointing a receiver to manage the property, a final judgment of foreclosure, and an eight-figure deficiency judgment against the guarantors.
- Represented a major league sports team in connection with its acquisition of real property for the development and construction of a stadium, involving issues with purchase money and secondary construction financing, environmental remediation, and quasi-judicial challenges to the stadium.
- Represented national banks, state-chartered banks, trustees, securitized trusts, and loan servicers in numerous foreclosures and lender liability lawsuits involving TCPA, FDCPA, TILA, RESPA, FCRA, and RICO claims.
- Represented a property owner in a quiet title dispute involving a series of fraudulently recorded forged deeds and a subsequent conveyance of the property to a third-party purchaser. Obtained a final judgment quieting title in favor of the client following trial.
- Represented the lender and servicer of a \$12.1 million commercial loan secured by a retail complex in foreclosure litigation and a subsequent loan workout and payoff transaction with a third-party purchaser.
- Represented a leading national wireless telephone company in a series of

breach of contract, intellectual property, and unfair trade lawsuits filed in federal courts throughout Florida, Texas, and California. Obtained permanent injunctions and final judgments exceeding \$10 million in damages against multiple defendants.

- Represented the lender of a \$1.6 million commercial loan secured by aluminum recycling equipment in a replevin lawsuit. Obtained prejudgment writ of replevin and final judgment of replevin as to the underlying collateral and negotiated a post-judgment workout with the borrower.
- Represented the lender and servicer of a \$10.4 million loan in a commercial foreclosure involving an apartment complex. Successfully obtained an order appointing a receiver to manage the property and negotiated settlement of the litigation and a sale of property.
- Represented an insurance broker in a breach of contract action involving the misappropriation of client revenue. Obtained a final judgment recovering all damages at trial for the client.
- Represented vehicle manufacturers in numerous manufacturing and design defect cases throughout Florida.

## All Insights

03.25.2015 Stripping of Unsecured Second Mortgages in Chapter 7 Bankruptcies in the Crosshairs

## Professional & Community Involvement

- American Bar Association
- Mortgage Bankers Association
- The Florida Bar
- Orange County Bar Association

## Speaking Engagements

- "Through the Gate of Local Government," ACC Central Florida, Orlando, FL (February 15, 2018)
- "Who You Gonna Call? Compliance Under the Telephone Consumer Protection Act (TCPA)," ACC Central Florida (April 12, 2017)

## Credentials

### EDUCATION

- University of Florida Fredric G. Levin College of Law (J.D., with honors, 2003)
  - Chester H. Ferguson Scholar
- University of North Carolina at Chapel Hill (B.A., with distinction, 1998)

### COURT ADMISSIONS

- U.S. District Court, Middle District of Florida
- U.S. District Court, Northern District of Florida
- U.S. District Court, Southern District of Florida
- U.S. District Court, Northern District of Texas

- Florida State Courts

#### BAR ADMISSIONS

- Florida

### **Areas of Focus**

#### PRACTICES

- Construction Litigation
- Creditors' Rights and Bankruptcy
- Life, Annuity, and Retirement Litigation
- Litigation and Trials
- Real Property Litigation
- Telecommunications
- Telephone Consumer Protection Act

#### INDUSTRIES

- Banking, Commercial, and Consumer Finance
- Construction
- Real Estate