

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT IN AND FOR  
MIAMI-DADE COUNTY, FLORIDA

FAMILY DIVISION  
CASE NO. 2022-009944-FC (18)

IN RE: THE MARRIAGE OF  
LEONARD M. HOCHSTEIN,  
Petitioner/Husband,  
and

LISA MACCALLUM HOCHSTEIN,  
Respondent/Wife.

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**WIFE'S MOTION FOR TEMPORARY ATTORNEY'S FEES AND COSTS**

COMES NOW, the Respondent/Wife, **LISA MACCALLUM HOCHSTEIN**, by and through her undersigned counsel, hereby files her *Motion for Temporary Attorney's Fees and Costs*, and as grounds therefore states:

1. This matter arises out of the filing of a Petition for Dissolution of Marriage by the Husband.
2. The parties have two (2) children together.
3. There is no question the Husband is the financial breadwinner and provider for the family. The Husband earns millions of dollars each and every year.
4. While the Husband has paid his professionals, including his predecessor and current law firm and forensic accountant, well in excess of \$100,000.00, the Husband has not advanced an initial retainer to the Wife's forensic accountant and is not paying the professional fees of the Wife.
5. The Wife has a need for payment of professional fees and costs. The Husband certainly has the greater ability to pay the Wife's professional fees.

6. Pursuant to Florida Statutes, 61.16, after considering the parties' financial resources, the Court may order a party to pay a reasonable amount of attorney's fees, suit monies, and costs to the other party. The purpose of this Statute is to ensure that both parties to a dissolution case have similar access to counsel and that neither has an unfair ability to obtain legal assistance because of the others financial advantage. Young v. Young, 898 So.2d 1076, 1077 (Fla. 3<sup>rd</sup> DCA 2005). Section 61.16, as implemented, is to ensure that both parties to a dissolution proceeding have similar access to counsel and can fight the action on a nearly equal footing. Nichols v. Nichols, 519 So.2d 620 (Fla. 1998).
7. It is undisputed the Husband has the greater ability to pay the Wife's professional fees, suit monies, and costs including her attorney's fees and accounting fees.
8. Accordingly, the Wife shall be severely prejudiced should the Court not award her attorney's fees and costs including an allocation for accounting fees.

WHEREFORE, the Respondent/Wife, LISA MACCULLUM HOCHSTEIN, respectfully requests that this Honorable Court enter an Order awarding her temporary attorney's fees, suit monies, and costs, including, but not limited to attorney's fees and costs, and any such other and further relief as this Court deems reasonable and just.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the above and foregoing was electronically served in compliance with Rule 2.516(a) and Administrative Order 13-49 through Florida Courts E-filing Portal this 13<sup>th</sup> day of OCTOBER, 2022, on:

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By  /s/PAUL S. LEINOFF  
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