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**Kim v. Galasso**, Case No. 2D20-3313 (Fla. 2d DCA 2022).

Trees are generally considered part of the realty, not personalty, and any contract taking planted trees out of the general rule must clearly show an intent the trees be personal property and furthermore must satisfy the statute of frauds.

**Perez v. The Estate of Ofelia Reitman**, Case No. 3D21-1104 (Fla. 3d DCA 2022).

A trial court is required by Florida Statute section 45.032(3)(b) to set an evidentiary hearing to determine entitlement to surplus foreclosure sale proceeds if - prior to the date the clerk reports the surplus as unclaimed - any person other than the owner of record claims an interest in the proceeds or the owner of record files a claim for the surplus but acknowledges there are others that may be entitled.

**RKHub Logistics LLC v. Eastern Auto Motor Corp.**, Case No. 4D21-2665 (Fla. 4th DCA 2022).

Florida Rule of Civil Procedure 1.510 sets a mandatory requirement that a trial court state on the record the reasons it granted or denied a motion for summary judgment.