

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

Claudia Umana v. MRG Glazing Contractors, Inc.

No. 3D25-0189 (Fla. 3d DCA May 20, 2026) · No. No. 3D25-0189; Lower Tribunal No. 23-988-CA-01 ·
Decided May 20, 2026

SUMMARY

The Third District Court of Appeal of Florida affirmed an attorney’s fee award in a final judgment of foreclosure of a construction lien. The court held that, because the appellant did not provide a transcript of the fee hearing, she failed to demonstrate reversible error regarding the requested fees and contingency fee multiplier.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	Fernandez; Logue; Lobree
JURISDICTION	Florida Third District Court of Appeal
DECIDED	May 20, 2026
DOCKET	No. 3D25-0189; Lower Tribunal No. 23-988-CA-01
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an award of attorney's fees included in a final judgment of foreclosure of a construction lien.
STANDARD OF REVIEW	An award of attorney's fees is reviewed for abuse of discretion. Whether claims are inextricably intertwined is reviewed de novo. The appellant bears the burden of demonstrating error.
PRECEDENTIAL VALUE	published
PARTIES	Claudia Umana v. MRG Glazing Contractors, Inc.

TOPICS

- appellate procedure
- standard of review
- mechanics liens
- foreclosure
- remedies

PRACTICE AREAS

- appellate procedure
- construction law
- real estate remedies

QUESTIONS PRESENTED

1. Whether the attorney's-fee award should be reversed because the amount of fees and use of a contingency-fee multiplier were allegedly unsupported by competent, substantial evidence when the appellant did not provide a transcript of the fee hearing.
2. What standards of review apply to an attorney's-fee award and to the determination whether claims are inextricably intertwined.

HOLDINGS

1. The appellate court affirmed the attorney's-fee award because Umana did not furnish a transcript of the fee hearing and therefore did not demonstrate reversible error.
2. An award of attorney's fees is reviewed for abuse of discretion.
3. Whether claims are inextricably intertwined is a question of law reviewed de novo.

KEY QUOTATIONS

“This Court reviews an award of attorney’s fees for abuse of discretion. A trial court’s determination of whether claims are inextricably intertwined is a question of law reviewed de novo.” (at 1)

“Even when based on erroneous reasoning, a conclusion or decision of a trial court will generally be affirmed if the evidence or an alternative theory supports it” (at 1-2)

FACTUAL BACKGROUND

MRG Glazing Contractors, Inc. obtained a final judgment of foreclosure of a construction lien that included an award of attorney's fees. Umana challenged the amount of fees requested and the use of a contingency fee multiplier, arguing that those matters were not supported by competent, substantial evidence. The appellate record did not include a transcript of the attorney's-fee hearing.

PROCEDURAL HISTORY

The Circuit Court for Miami-Dade County entered a final judgment of foreclosure of a construction lien that included an award of attorney's fees. Umana appealed, challenging the amount of fees and the use of a contingency fee multiplier. The Third District Court of Appeal affirmed because Umana did not provide a transcript of the fee hearing.

DISPOSITION

affirmed

CASES CITED

- Aquastar Holdings LLC v. Avant Design Grp., Inc., 421 So. 3d 767, 770 n.3 (Fla. 3d DCA 2025)
- Shelly L. Hall, M.D., P.A. v. White, 97 So. 3d 907, 909 (Fla. 1st DCA 2012)
- Val v. Gentera Ctr. for Plastic Surgery, LLC, 419 So. 3d 793 (Fla. 3d DCA 2025)
- Applegate v. Barnett Bank of Tallahassee, 377 So. 2d 1150, 1152 (Fla. 1979)

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