

IN THE CIRCUIT COURT OF THE 17<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE No: 12-34121 (07)  
Complex Litigation Unit

P&S ASSOCIATES, GENERAL  
PARTNERSHIP, a Florida limited partnership;  
*et al.*

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE TRUST,  
a charitable trust, et al.

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**PLAINTIFFS' RESPONSES AND OBJECTIONS TO DEFENDANT, HOLY GHOST  
FATHERS HG-MOMBASA'S FIRST REQUEST FOR ADMISSIONS DIRECTED TO  
PLAINTIFFS**

Pursuant to Florida Rule of Civil Procedure 1.370, Plaintiffs, by and through their undersigned counsel, hereby respond and object to Defendant, Holy Ghost Fathers HG-Mombasa's Requests for Admission to Plaintiffs.

**RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS**

1. Holy Ghost Fathers HG-Mombasa was never a partner in S&P Associates, General Partnership, a Florida Limited Partnership.

Response: Plaintiffs admit that Holy Ghost Fathers HG-Mombasa was never a partner in S&P Associates General Partnership, a Florida Limited Partnership.

2. Holy Ghost Fathers HG-Mombasa received a distribution from P&S Associates on January 23, 2008.

Response: Plaintiffs deny that Holy Ghost Fathers HG-Mombasa received a distribution from P&S Associates on January 23, 2008.

3. Holy Ghost Fathers HG-Mombasa has not received a distribution from P&S Associates since January 23, 2008.

Response: Plaintiffs deny that Holy Ghost Fathers HG-Mombasa has not received a distribution from P&S Associates since January 23, 2008 because Holy Ghost Fathers HG-Mombasa received a distribution at least on June 30, 2008.

4. Holy Ghost Fathers HG-Mombasa has not contributed any money to P&S Associates since September 4, 2007.

Response: Plaintiffs admit that Holy Ghost Fathers HG-Mombasa has not contributed any money to P&S Associates since September 4, 2007.

5. As of January 23, 2008, the balance in Holy Ghost Fathers HG-Mombasa's capital account in P&S Associates was zero dollars.

Response: Plaintiffs deny that as of January 23, 2008, the balance in the Holy Ghost Father HG-Mombasa's capital account in P&S Associates was zero dollars because the account balance as of that date was negative \$80,000.

6. There has been no activity in the capital account of Holy Ghost Fathers HG-Mombasa since January 23, 2008.

Response: Plaintiffs deny that there has been no activity in the capital account of Holy Ghost Fathers HG-Mombasa since January 23, 2008 because Holy Ghost Fathers HG-Mombasa received a distribution at least on June 30, 2008.

7. P&S Associates has never provided Holy Ghost Fathers HG-Mombasa with annual partnership records.

Response: Plaintiffs object to Request for Admission Number 7 because the undefined term "annual partnership records" is vague and unclear.

8. P&S Associates has not provided Holy Ghost Fathers HG-Mombasa with annual partnership records for any period after 2008.

Response: Plaintiffs object to Request for Admission Number 8 because the undefined term “annual partnership records” is vague and unclear.

9. P&S Associates provided Holy Ghost Fathers HG-Mombasa with annual partnership records for 2008.

Response: Plaintiffs object to Request for Admission Number 9 because the undefined term “annual partnership records” is vague and unclear.

10. P&S Associates provided Holy Ghost Fathers HG-Mombasa with annual partnership records for 2009.

Response: Plaintiffs object to Request for Admission Number 10 because the undefined term “annual partnership records” is vague and unclear.

11. P&S Associates provided Holy Ghost Fathers HG-Mombasa with annual partnership records for 2010.

Response: Plaintiffs object to Request for Admission Number 11 because the undefined term “annual partnership records” is vague and unclear.

12. P&S Associates provided Holy Ghost Fathers HG-Mombasa with annual partnership records for 2011.

Response: Plaintiffs object to Request for Admission Number 12 because the undefined term “annual partnership records” is vague and unclear.

13. P&S Associates provided Holy Ghost Fathers HG-Mombasa with annual partnership records for 2012.

Response: Plaintiffs object to Request for Admission Number 13 because the undefined term “annual partnership records” is vague and unclear.

14. P&S Associates provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 Schedule K-1 for 2008.

Response: Plaintiffs admit that P&S Associates provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 Schedule K-1 for 2008.

15. P&S Associates never provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 Schedule K-1 for any period after 2008.

Response: Plaintiffs deny Request for Admission Number 15 because P&S Associates provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 K-1 for periods after 2008.

16. P&S Associates has not provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 Schedule K-1 since 2009.

Response: Plaintiffs deny that P&S Associates has not provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 Schedule K-1 since 2009 because P&S Associates provided Holy Ghost Fathers HG-Mombasa with Partnership Form 1065 K-1 since 2009.

17. Holy Ghost Fathers HG-Mombasa is dissociated from P&S Associates.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa’s responses to Plaintiffs’

discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 17.

18. Holy Ghost Fathers HG-Mombasa was dissociated from P&S Associates as of January 23, 2008.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 18.

19. Holy Ghost Fathers HG-Mombasa was dissociated from P&S Associates in 2008.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 19.

20. Holy Ghost Fathers HG-Mombasa was dissociated from P&S Associates in 2009.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 20.

21. Holy Ghost Fathers HG-Mombasa was dissociated from P&S Associates on November 13, 2012.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 21.

22. Holy Ghost Fathers HG-Mombasa was dissociated from P&S Associates in 2013.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 22.

23. Holy Ghost Fathers HG-Mombasa had no role in the affairs of P&S Associates after December 31, 2008.

Response: Plaintiffs object to Request for Admission Number 23, because the undefined terms "role" and "affairs" are vague and unclear.

24. Holy Ghost Fathers HG-Mombasa had no role in the affairs of P&S Associates in 2009.

Response: Plaintiffs object to Request for Admission Number 24, because the undefined terms "role" and "affairs" are vague and unclear.

25. Holy Ghost Fathers HG-Mombasa had no role in the affairs of P&S Associates in 2010.

Response: Plaintiffs object to Request for Admission Number 25, because the undefined terms “role” and “affairs” are vague and unclear.

26. Holy Ghost Fathers HG-Mombasa had no role in the affairs of P&S Associates in 2011.

Response: Plaintiffs object to Request for Admission Number 26, because the undefined terms “role” and “affairs” are vague and unclear.

27. Holy Ghost Fathers HG-Mombasa had no role in the affairs of P&S Associates in 2012.

Response: Plaintiffs object to Request for Admission Number 27, because the undefined terms “role” and “affairs” are vague and unclear.

28. There has been no communication between Holy Ghost Fathers HG-Mombasa and P&S Associates from the time of issuance of the last Partnership Form 1065 Schedule K-1 until the November 13, 2012 letter sent by plaintiffs.

Response: Plaintiffs have made a reasonably inquiry but because Plaintiffs are in the process of reviewing and obtaining all of the documents in relation to P&S Associates, including without limitation waiting for Holy Ghost Fathers HG-Mombasa’s responses to Plaintiffs’ discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 28.

Respectfully submitted,

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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon counsel identified below registered to receive electronic notifications and regular U.S. mail upon *Pro Se* parties this 10th day of January, 2014 upon the following:

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