

IN THE CIRCUIT COURT OF THE 17th
JUDICIAL CIRCUIT, IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO: 12-34121(07)

Complex Litigation Unit

PHILIP J. VON KAHLE, as Conservator of
P&S ASSOCIATES, GENERAL
PARTNERSHIP, and S&P ASSOCIATES,
GENERAL PARTNERSHIP,

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE
TRUST, et al,

Defendants.

DEFENDANTS JUDDS' RESPONSE TO PLAINTIFFS' MOTION TO COMPEL

Plaintiffs' Motion to Compel should be denied for several reasons:

1. Plaintiffs know that Defendants Judds' Motion to Stay Proceedings was pending before the Court (Exhibit A attached hereto).
2. Plaintiffs' counsel had been told that James Judd would not be available . Furthermore, he is presently out of the country and not scheduled to return to the United States until the week of Thanksgiving. James Judd's Affidavit is attached hereto as Exhibit B.
3. Plaintiffs have repeatedly ignored this Court's rulings and directions in regard to discovery – for example, on August 18, 2014, Plaintiffs' Counsel Hyman was instructed to respond to Defendants Judd Third Interrogatories within 15 days (the amount of time that Hyman requested) (Exhibit C hereto.) Plaintiffs did not respond until September 16, 2014 and then simply objected to each one of the interrogatories on the grounds that each of the six interrogatories exceeded the permissible number (Exhibit D hereto.)

4. Even after the Court had overruled Plaintiffs' Counsel Hyman's objection to Defendants Judds' discovery on August 18, 2014, Plaintiffs' counsel repeated the same objection in their tardy response to Defendants Judds' Third Interrogatories.
5. Moreover, when Defendants had noticed the conservator's deposition for September 29, 2014, Plaintiffs' counsel simply said that he wasn't available.

Wherefore Defendants Judd respectfully pray that Plaintiffs' Motion to Compel be denied.

Dated this 29th day of October, 2014.

s/ Julian H. Kreeger

JULIAN H. KREEGER, P.A.
Florida Bar No. 098595
Attorneys for James and Valerie Judd
Offices at Grand Bay Plaza
2665 S. Bayshore Drive, Suite 220-14
Miami, Florida 33133
Tel: (305) 373-3101
Fax: (305) 381-8734

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon Leonard Samuels, Esq. of BergerSingerman and counsel identified below registered to receive electronic notifications and regular U.S. mail upon Pro Se parties this 29th day of October, 2014 upon the following:

Counsel E-mail Address:

Ana Hesny, Esq. ah@assoulineberlowe.com; ena@assoulineberlowe.com
Eric N. Assouline, Esq. ena@assoulineberlowe.com; ah@assoulineberlowe.com
Annette M. Urena, Esq. auren@dkdr.com; cmackey@dkdr.com; service-amu@dkdr.com
Daniel W Matlow, Esq. dmatlow@danmatlow.com; assistant@danmatlow.com
Debra D. Klingsberg, Esq. dklingsberg@huntgross.com
Robert J. Hunt, Esq. bobhunt@huntgross.com
Joanne Wilcomes, Esq. jwilcomes@mccarter.com
Evan Frederick, Esq. efrederick@mccaberabin.com
Etan Mark, Esq. emark@bergersingerman.com; drt@bergersingerman.com; lyun@bergersingerman.com
Evan H Frederick, Esq. efrederick@mccaberabin.com; janet@mccaberabin.com; beth@mccaberabin.com
B. Lieberman, Esq. blieberman@messana-law.com

Jonathan Thomas Lieber, Esq. jlieber@dobinlaw.com
Mariaelena Gayo-Guitian, Esq. mguitian@gjb-law.com
Barry P. Gruher, Esq. bgruher@gjb-law.com
William G. Salim, Jr., Esq. wsalim@mmslaw.com
Domenica Frasca, Esq. dfrasca@mayersohnlaw.com; service@mayersohnlaw.com
Joseph P Klapholz, Esq. jklap@klapholzpa.com; dml@klapholzpa.com
Joseph P. Klapholz, Esq. jklap@klapholzpa.com; dml@klapholzpa.com;
Julian H Kreeger, Esq. juliankreeger@gmail.com
L Andrew S Riccio, Esq. ena@assoulineberlowe.com; ah@assoulineberlowe.com
Leonard K. Samuels, Esq. lsamuels@bergersingerman.com; vleon@bergersingerman.com;
drt@bergersingerman.com.
Marc S Dobin, Esq. service@dobinlaw.com; mdobin@dobinlaw.com;
Michael C Foster, Esq. mfoster@dkdr.com; cmackey@dkdr.com; kdominguez@dkdr.com
Michael Casey, Esq. mcasey666@gmail.com
Richard T. Woulfe, Esq. pleadings.RTW@bunnellwoulfe.com
Michael R. Casey, Esq. mcasey666@gmail.com
Brett Lieberman, Esq. blieberman@messana-law.com
Marc Dobin, Esq. service@dobinlaw.com
Peter Herman, Esq. PGH@trippscott.com
Robert J Hunt, Esq. bobhunt@huntgross.com; sharon@huntgross.com; eservice@huntgross.com
Ryon M McCabe, Esq. rmccabe@mccaberabin.com; janet@mccaberabin.com; beth@mccaberabin.com
Steven D. Weber, Esq. sweber@bergersingerman.com; lwebster@bergersingerman.com;
drt@bergersingerman.com
Thomas J. Goodwin, Esq. tgoodwin@mccarter.com; nwendt@mccarter.com; jwilcomes@mccarter.com
Thomas L Abrams, Esq. tabrams@tabramslaw.com; fcolumbo@tabramslaw.com
Thomas M. Messana, Esq. tmessana@messana-law.com; tmessana@bellsouth.net;
mwslawfirm@gmail.com
Zachary P Hyman, Esq. zhyman@bergersingerman.com; DRT@bergersingerman.com;
clamb@bergersingerman.com.

s/ Julian H. Kreeger

JULIAN H. KREEGER

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Plaintiffs,

vs.

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TRUST, et al,

Defendants.

**DEFENDANTS JAMES AND VALERIE JUDD'S MOTION TO ENFORCE
SETTLEMENT AGREEMENT**

Defendants, James and Valerie Judd move to enforce Plaintiffs' settlement agreement in accordance with the agreement described in the email from Plaintiffs' counsel Zachary Hyman, Esq., a copy of which is attached hereto as Exhibit A.

That agreement called for payment of a sum certain provided that financial statements would be provided that were consistent with the financial representations made regarding the Judds' financial condition. Consistent with these financial representations and pursuant to the agreement referenced by Mr. Hyman, these statements have been provided.

The Court should be apprised that Stephen Weber, Esq. subsequently disclaimed the agreement stated by Mr. Hyman and denies the existence of such a tentative agreement.

Wherefore Defendants Judd pray for the court to stay further proceedings against Defendants James and Valerie Judd and to enter an order enforcing the settlement agreement.

Ex. A

Respectfully submitted,

s/ Julian H. Kreeger
JULIAN H. KREEGER, P.A.
Florida Bar No. 098595
Attorneys for Defendants James and Valerie Judd
Offices at Grand Bay Plaza
2665 Bayshore Drive, Suite 220-14
Miami, Florida 33133
Telephone: (305) 373-3101
Facsimile: (305) 381-873

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon Leonard Samuels, Esq. of Berger Singerman and counsel identified below registered to receive electronic notifications, and regular U.S. mail upon Pro Se parties on this 23rd day of September, 2014 upon the following:

Counsel	E-mail address:
Ana Hesny, Esq.	ah@assoulineberlowe.com; ena@assoulineberlowe.com
Eric N. Assouline, Esq.	ena@assoulineberlowe.com; ah@assoulineberlowe.com
Annette M. Urena, Esq.	aurena@dkdr.com; cmackey@dkdr.com; service-amu@dkdr.com
Daniel W Matlow, Esq.	dmatlow@danmatlow.com; assistant@danmatlow.com
Debra D. Klingsberg, Esq.	dklingsberg@huntgross.com
Robert J. Hunt, Esq.	bobhunt@huntgross.com
Joanne Wilcomes, Esq.	jwilcomes@mccarter.com
Evan Frederick, Esq.	efrederick@mccaberabin.com
Etan Mark, Esq.	emark@bergersingerman.com; drt@bergersingerman.com; lyun@bergersingerman.com
Evan H Frederick, Esq.	efrederick@mccaberabin.com; janet@mccaberabin.com; beth@mccaberabin.com
B. Lieberman, Esq.	blieberman@messana-law.com
Jonathan Thomas Lieber, Esq.	jlieber@dobinlaw.com
Mariaelena Gayo-Guitian, Esq.	mguitian@gjb-law.com
Barry P. Gruher, Esq.	bgruher@gjb-law.com
William G. Salim, Jr., Esq.	wsalim@mmsslaw.com
Domenica Frasca, Esq.	dfrasca@mayersohnlaw.com; service@mayersohnlaw.com
Joseph P. Klapholz, Esq.	jklap@klapholzpa.com; dml@klapholzpa.com
Julian H Kreeger, Esq.	juliankreeger@gmail.com
L Andrew S Riccio, Esq.	ena@assoulineberlowe.com; ah@assoulineberlowe.com
Leonard K. Samuels, Esq.	lsamuels@bergersingerman.com; vleon@bergersingerman.com; drt@bergersingerman.com
Marc S Dobin, Esq.	service@dobinlaw.com; mdobin@dobinlaw.com;
Michael C Foster, Esq.	mfoster@dkdr.com; cmackey@dkdr.com; kdominguez@dkdr.com
Richard T. Woulfe, Esq.	pleadings.RTW@bunnellwoulfe.com
Michael R. Casey, Esq.	mcasey666@gmail.com
Brett Lieberman, Esq.	blieberman@messana-law.com
Marc Dobin, Esq.	service@dobinlaw.com
Peter Herman, Esq.	PGH@trippscott.com

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TRUST, et al,

Defendants.

AFFIDAVIT

STATE OF New York

COUNTY OF New York

BEFORE ME, the undersigned official, appeared James Judd who, upon being sworn,
deposes and says as follows:

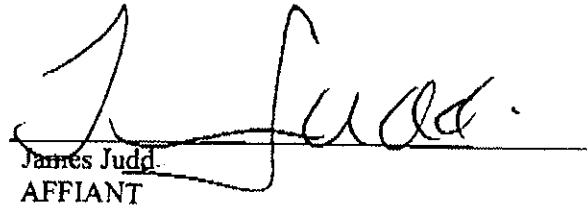
1. I am named as a Defendant in this lawsuit. I am not in Florida and will not return to Florida until the week of Thanksgiving at the earliest.
2. I am in New York until Monday, October 27, 2014, when I am to travel to Tel Aviv, Israel for rehearsal commitments with the Israel Symphony until November 1, 2014.
3. On November 1, 2014 I travel from Israel to Shanghai, China for a China tour with the Israel Symphony.
4. On November 11, 2014 I travel from Beijing, China to Vienna, Austria for rehearsals and concerts with the Vienna Symphony.
5. On November 13, 2014 I travel from Vienna to Istanbul, Turkey.
6. On November 15, 2014 I travel from Istanbul back to Vienna.

Ex. B

- 7. On November 17, 2014 I travel from Vienna to New York for a rehearsal and concert in New York.
- 8. I will not return to Florida until November 22, 2014 (the week of Thanksgiving).
- 9. I did not sign Exhibit A attached hereto, the single page dated July 14, 2000 of S & P Associates.
- 10. I did not sign either Schwab One Check No. 141 or Northern Trust check No. 2264 attached hereto as Exhibit B.
- 11. I was never given a copy of the Amended Partnership Agreement of S&P Associates dated December 21, 1994 which Plaintiffs attached to the Third Amended Complaint.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this ___ day of October, 2014.


 James Judd
 AFFIANT

The foregoing instrument was acknowledged before me this 4 day of October, 2014, by James Judd, who is personally known to me or who has produced U.K. Passport as identification.


 NOTARY PUBLIC

Robert Taylor
 Name of Notary (Typed, Printed or Stamped)

My commission expires:

ROBERT J. TAYLOR
 Notary Public - State of New York
 No. 01TA6261783
 Qualified in New York County
 My Commission Expires May 14, 2018

Exhibit A

Complete 21, 22 and Exhibit A and mail this page only with check made payable to "S & P Associates, GP" to:

S & P ASSOCIATES, General Partnership
c/o SULLIVAN & POWELL
4330 N. Federal Hwy., Suite 210
 Ft. Lauderdale, FL 33309-1404

1) The parties hereto have executed this Agreement by the signature and date set forth below.
(sign and date)

James J. J.

Date: _____
Date: 7/14/2000
Date: _____
Date: _____

2) Please check one of the following:

- I elect to receive my distributions on a quarterly basis (payable at 12%).
- I elect to have my quarterly distribution reinvested in the Partnership.

held
7/24/00

Name, Address Telephone # and Fax #	EMIRKA (Title of Your Account)	Soc. Sec. # or Federal ID#	Capital Contribution
<u>James Ludd + Valerie Bruce Ltd</u> <u>2421 Barcelona Drive</u> <u>ft. Lauderdale Fl</u> <u>33301</u>			<u>100 K</u>

tel 954 467 2221
954 462 2934

Exhibit B

JAMES JUDD
VALERIE BRUCE JUDD
 2421 BARCELONA DR
 FORT LAUDERDALE, FL 33301

SchwabOne 141

July 11, 2000 $\frac{1-1}{100}$

Pay to the order of SP Associates, General Partnership 100,000.

One hundred thousand Dollars

Charles Schwab
 180 BARRI BLA
 PHOENIX, AZ

For _____

⑆031000053⑆ 7011125896⑆ 20111

RECEIVED
 JUL 24 2000
 BY: 84

JAMES JUDD
2421 BARCELONA DRIVE 954-487-2781
FT. LAUDERDALE, FL 33301

11-22-14

2264

DATE Oct 15/2000

PAY TO THE ORDER OF QEP Associates

Eighty thousand

\$80,000

DOLLARS

Northern Trust Bank of Florida N.A.
P.O. Box 1000, Ft. Lauderdale, FL 33301

⑆066009650⑆1416002918⑆ 2264

rec'd 10/17/00

MINI-TRANSCRIPT OF AUGUST 18, 2014 HEARING

1 In that case, let me look at the documents
2 that they claim they produced.

3 THE COURT: Well, I've ordered them to produce
4 either, demonstrate previous production to you or
5 produce what they haven't produced, all of which is
6 within 10 days. If it's voluminous records, they may
7 say, "You come to our office, and you may review them
8 and copy them as you wish."

9 I'm not going to require them to copy 10 years
10 worth of audits and 10 years worth of financial
11 statements. If you want them. You may decide you
12 don't need them all.

13 MR. KREEGER: Alright. I don't agree with him
14 that I asked for everything that they had, but I'll
15 determine that when I take a look at it.

16 I asked them to admit the genuineness of the
17 activity reports that we got.

18 THE COURT: Now, you're looking at the Request
19 for Admissions.

20 MR. KREEGER: This is the Second Request.

21 THE COURT: The Second Request, okay.

22 MR. KREEGER: And here's a copy of it.

23 THE COURT: I think it's in here.

24 Yes. Which paragraph?

25 MR. HYMAN: We didn't respond to any of the

21

1 Second Requests for Admissions because we filed a
2 motion for protective order, Your Honor.

3 THE COURT: Well, first of all, a Request for
4 Admissions is sort of a hybrid. It's really not a
5 discovery document. In it's truest sense, it's
6 intended as a document to narrow the issues, what
7 facts are we disputing, what facts are we admitting,
8 what documents can we agree are genuine so we don't
9 have to worry about trying to lay a foundation or
10 bring in a records custodian?

11 And, again, given the fact that these were
12 only served within a couple of months of Mr.
13 Kreeger's accepting service for his client, I'm not
14 holding the Judds to the terms of the case management
15 order for which they had not been served at the time
16 it was entered. I'm not going to do that.

17 So, if your only reason for not responding is
18 because you didn't think you have to, you have to.

19 Tell me how much time you need to respond to
20 them.

21 MR. KREEGER: There's a parallel interrogatory
22 that relates to the —

23 THE COURT: Could I finish with this first?

24 MR. KREEGER: Sure.

25 THE COURT: How many days do you need? I'm

22

1 not going to say 10. How many days do you need, with
2 the understanding is right now the Judds still remain
3 a part of the trial scheduled for September 9, 10 and
4 11, which may not be feasible. So you tell me. I
5 know you guys are really busy.

6 MR. HYMAN: I'd probably say 15 days.

7 THE COURT: That's fine.

8 MR. HYMAN: And, Your Honor, if I may, at
9 least as it relates to the Judds, I would request
10 that the Court enter an order prohibiting them from
11 propounding further discovery on us after this point
12 as at this point we spent more money on in dealing in
13 terms of time and energy and dealing with the issues
14 raised by Mr. Kreeger than almost any other
15 defendant. And their clients only owe approximately
16 \$80,000, as alleged, and at this point it's almost
17 onerous to have to constantly repeatedly respond to
18 and address Mr. Kreeger's different tactics and
19 issues. And while we do and would like to work with
20 him, it is difficult in the circumstances.

21 THE COURT: That request is denied.

22 MR. HYMAN: Okay.

23 THE COURT: The fact is what we try to do is
24 marshal as many claims and issues within one
25 calendar. And when we have someone who is not

23

1 properly served until well after the case management
2 order is entered, they cannot be bound strictly to
3 the terms of that case management order. And the
4 fact is it's only five months since he was served;
5 and he's saying, "I've been propounding this
6 discovery," and they're entitled to it. So 15 days.

7 MR. HYMAN: I understand that, Your Honor.
8 However, we still, although we agreed to resolve the
9 dispute in terms of service without an evidentiary
10 hearing, and I realize Your Honor already ruled on
11 it, it's our position that his client was properly
12 served; and I understand completely that he accepted
13 service officially on March.

14 THE COURT: 15 days to respond to the Second
15 Request for Admissions.

16 What else?

17 MR. HYMAN: Very well, Your Honor.

18 MR. KREEGER: May I just comment?

19 THE COURT: No.

20 What else?

21 MR. KREEGER: Then let me see what they do.

22 THE COURT: Okay.

23 Anything else.

24 MR. KREEGER: I would like to comment about,
25 and this is not part of my motion to compel, I met

24

Ex. C

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Plaintiffs,

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JANET A. HOOKER CHARITABLE TRUST, et al,

Defendants.

**PLAINTIFFS' RESPONSE AND OBJECTIONS TO DEFENDANT JAMES AND
VALERIE JUDD'S THIRD SET OF INTERROGATORIES TO PLAINTIFFS**

12. Please state what accounting services were performed for S&P Associates each year from 2000 through 2008 by Ahearn Jasco Company and/or Michael J. Kuzy, CPA, including, but not limited to, auditing, preparation of U.S. Partnership Returns of Income Form 1065 and schedule K-1.

Response: Plaintiffs object to Interrogatory Number 12 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs further object to Interrogatory Number 12 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions and have permitted Defendants Judd to inspect S&P's books and records. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have in relation to every other defendant in this matter. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

13. For each year from 2000 through 2008, state:
- a. How much money was invested by S&P Associates
 - i. with Bernard L. Madoff Investment Securities, LLC?
 - ii. with other investments?

Ex. D

- b. How much income was received by S&P Associates:
 - i. from Bernard L. Madoff Investment Securities, LLC?
 - ii. from other investments?
- c. How much money was distributed by S&P to Partners of S&P each quarter?
- d. How much money was re-invested by S&P Partners in S&P Capital?
- e. How much money was distributed to the General Partners of S&P?

Response: Plaintiffs object to Interrogatory Number 13 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs further object to Interrogatory Number 13 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have for any other defendant in this matter. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

14. When was the first date that Plaintiffs claim that S&P made distributions to certain S&P partners that were not made from S&P profits but from principal contributions of other partners; and state to whom such distributions were made, including the dates and amounts.

Response: Plaintiffs object to Interrogatory Number 14 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs further object to Interrogatory Number 14 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have in relation to every defendant in this matter. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

15. If Plaintiffs claim that S&P Associates perpetrated a "Ponzi" scheme and/or fraud, please state:
 - a. Whether you claim that it was a "Ponzi" scheme or fraud;
 - b. The date you claim that S&P Associates first perpetrated the "Ponzi" scheme or fraud and what facts support such claims;
 - c. The amounts invested each year by S&P Associates with BLMIS;
 - d. The amounts of payments received from BLMIS for each year from 1995 through 2008.
 - e. The amounts of income received each year from BLMIS from 1995 - 2008;
 - f. The amounts of income received each year from other investments made from 1995-2008.

Response: Plaintiffs object to Interrogatory Number 15 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs further object to Interrogatory Number 15 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have in relation to every other defendant in

this matter. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

16. State the names and addresses of each "net loser" of S&P and for each state:
- The amount and date of their initial capital investment;
 - Whether they elected to receive quarterly distributions or chose to have their distributions reinvested as capital;
 - The date they received each payment and/or distribution and the amount;
 - The dates each were sent an Activity Statement and K-1 and the amount shown on each for the net realized gain and total realized balance for each for the ending capital account.

Response: Plaintiffs object to Interrogatory Number 16 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs further object to Interrogatory Number 16 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have in relation to every other defendant in this matter. Plaintiffs also object to Interrogatory Number 16 because it is not reasonably calculated to lead to the production of admissible evidence, and is overly broad and unduly burdensome. The benefit of compiling a list of each "net loser," whether they elected to receive quarterly distributions, the dates they received each payment, and the dates they received an activity status report and/or K1 far outweighs any benefit in such a production. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

17. What actions and claims have been made by Plaintiffs, the status of each, and what recovery has been made:
- Against Bernard L. Madoff Investment Securities, LLC;
 - Against Sullivan and his related entities; and
 - Against Powell and his related entities.

Response: Plaintiffs object to Interrogatory Number 17 because it exceeds the number allowed by the Florida Rules of Civil Procedure. Plaintiffs also object to Interrogatory Number 17 because it is not reasonably calculated to lead to the production of admissible evidence. Plaintiffs' other avenues of potential recovery does not have any rational relationship to their claims in the instant case. Plaintiffs further object to Interrogatory Number 13 because they have produced the documents that they have in their possession custody and control that relate to Defendants Judd on multiple occasions. Plaintiffs have spent more time addressing the issues pertaining to Defendants Judd than they have in relation to every other defendant in this matter. As such, these interrogatories constitute an attempt to harass the Plaintiffs and engage in vexatious litigation.

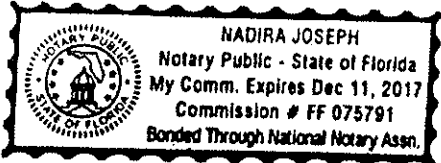
ACKNOWLEDGEMENT

By: [Signature]
 Philip von Kahle
 Title: [Signature]
 Conservator

STATE OF FLORIDA)
) SS:
 COUNTY OF BROWARD)

BEFORE ME, the undersigned authority, personally appeared PHILIP VON KAHLE who, being first duly sworn, deposes and states that the answers to the foregoing interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me, this 16 day of SEPTEMBER, 2014, by PHILIP VON KAHLE, who is personally known to me, or has produced _____ as identification.



[Signature]
 Notary Public, State of
 Commission No.

My Commission Expires: