

IN THE CIRCUIT COURT OF THE 17th
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.

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO DEFENDANT, HOLY GHOST
FATHERS COMPASSION FUND'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 Compassion Fund's Requests for Admission to Plaintiffs.

RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS

1. Holy Ghost Fathers Compassion Fund was never a partner in S&P Associates, General Partnership, a Florida Limited Partnership.

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

2. Holy Ghost Fathers Compassion Fund received a distribution from P&S Associates on March 31, 2008.

Response: Plaintiffs admit that Holy Ghost Fathers Compassion fund received a distribution from P&S Associates on March 31, 2008.

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3. Holy Ghost Fathers Compassion Fund has not received a distribution from P&S Associates since March 31, 2008.

Response: Plaintiffs admit that Holy Ghost Fathers Compassion Fund has not received a distribution from P&S Associates since March 31, 2008.

4. Holy Ghost Fathers Compassion Fund has not contributed any money to P&S Associates since June 5, 2007.

Response: Plaintiffs admit that Holy Ghost Fathers Compassion Fund has not contributed any money to P&S Associates since June 5, 2007.

5. As of March 31, 2008, the balance in Holy Ghost Fathers Compassion Fund capital account in P&S Associates was zero dollars.

Response: Plaintiffs deny that as of March 31, 2008, the balance in the Holy Ghost Fathers Compassion Fund capital account in P&S associates was zero dollars because the balance in the Holy Ghost Fathers Compassion Fund was negative \$263,764.54 as of that date.

6. There has been no activity in the capital account of Holy Ghost Fathers Compassion Fund since March 31, 2008.

Response: Plaintiffs admit that there has been no activity in the capital account of Holy Ghost Fathers Compassion Fund since March 31, 2008.

7. P&S Associates has never provided Holy Ghost Fathers Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund with Partnership Form 1065 Schedule K-1 for 2008.

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

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

Response: Plaintiffs deny that P&S Associates provided Holy Ghost Fathers Compassion Fund with Partnership Form 1065 Schedule K-1 for any period after 2008 because Holy Ghost Fathers Compassion Fund was provided with Partnership Form 1065 Schedule K-1 since that date.

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

Response: Plaintiffs deny that P&S Associates provided Holy Ghost Fathers Compassion Fund with Partnership Form 1065 Schedule K-1 since 2009, because Holy Ghost Fathers Compassion Fund was provided with Partnership Form 1065 Schedule K-1 since 2009.

17. Holy Ghost Fathers Compassion Fund 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 Compassion Fund was dissociated from P&S Associates as of March 31, 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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 Compassion Fund 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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