

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 INTERNATIONAL FUND #2'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 responds and objects to Defendant, Holy Ghost Fathers International Fund # 2's Requests for Admission to Plaintiffs.

RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS

1. Holy Ghost Fathers International Fund #2 was never a partner in S&P Associates, General Partnership, a Florida Limited Partnership.

Response: Plaintiffs admit that Holy Ghost Fathers International Fund #2 was never a partner in S&P Associates, General Partnership, a Florida Limited Partnership.

2. Holy Ghost Fathers International Fund #2 received a distribution from P&S Associates on January 24, 2007.

Response: Plaintiffs admit that Holy Ghost Fathers International Fund #2 received a distribution from P&S Associates on January 24, 2007.

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3. Holy Ghost Fathers International Fund #2 has not received a distribution from P&S Associates since January 24, 2007.

Response: Plaintiffs admit that Holy Ghost Fathers International Fund #2 has not received a distribution from P&S Associates since January 24, 2007.

4. Holy Ghost Fathers International Fund #2 has not contributed any money to P&S Associates since December 16, 2003.

Response: Plaintiffs admit that Holy Ghost Fathers International Fund #2 has not contributed any money to P&S Associates since December 16, 2003.

5. As of January 27, 2007, the balance in Holy Ghost Fathers International Fund #2's capital account in P&S Associates was zero dollars.

Response: Plaintiffs deny that as of January 27, 2007, the balance in Holy Ghost Fathers International Fund #2's capital account in P&S Associates was zero dollars because the balance in the Holy Ghost Father International Fund #2's capital account was negative \$472,624.27 as of that date.

6. There has been no activity in the capital account of Holy Ghost Fathers International Fund #2 since January 24, 2007.

Response: Plaintiffs admit that there has been no activity in the capital account of Holy Ghost Fathers International Fund #2 since January 24, 2007.

7. P&S Associates has never provided Holy Ghost Fathers International Fund #2 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 International Fund #2 with annual partnership records for any period after 2007.

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 International Fund #2 with annual partnership records for 2007.

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 International Fund #2 with annual partnership records for 2008.

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 International Fund #2 with annual partnership records for 2009.

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 International Fund #2 with annual partnership records for 2010.

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 International Fund #2 with annual partnership records for 2011.

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 International Fund #2 with annual partnership records for 2012.

Response: Plaintiffs object to Request for Admission Number 14 because the undefined term “annual partnership records” is vague and unclear.

15. P&S Associates provided Holy Ghost Fathers International Fund #2 with Partnership Form 1065 Schedule K-1 for 2007.

Response: Plaintiffs admit that P&S Associates provided Holy Ghost Fathers International Fund #2 with Partnership Form 1065 Schedule K-1 for 2007.

16. P&S Associates never provided Holy Ghost Fathers International Fund #2 with Partnership Form 1065 Schedule K-1 for any period after 2007.

Response: Plaintiffs deny Request for Admission Number 16, because P&S Associates provided Holy Ghost Fathers International Fund #1 with Form 1065 Schedule K-1 for periods after 2008.

17. P&S Associates has not provided Holy Ghost Fathers International Fund #2 with Partnership Form 1065 Schedule K-1 since 2008.

Response: Plaintiffs deny Request for Admission Number 17, because P&S Associates provided Holy Ghost Fathers International Fund #1 with Form 1065 Schedule K-1 for periods after 2008.

18. Holy Ghost Fathers International Fund #2 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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 18.

19. Holy Ghost Fathers International Fund #2 was dissociated from P&S Associates as of January 24, 2007.

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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 19.

20. Holy Ghost Fathers International Fund #2 was dissociated from P&S Associates in 2007.

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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 20.

21. Holy Ghost Fathers International Fund #2 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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 21.

22. Holy Ghost Fathers International Fund #2 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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 22.

23. Holy Ghost Fathers International Fund #2 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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 23.

24. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates after December 31, 2007.

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

25. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates in 2008.

Response: Plaintiffs object to Request for Admission Number25, because the undefined terms “role” and “affairs” are vague and unclear.

26. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates in 2009.

Response: Plaintiffs object to Request for Admission Number26, because the undefined terms “role” and “affairs” are vague and unclear.

27. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates in 2010.

Response: Plaintiffs object to Request for Admission Number27, because the undefined terms “role” and “affairs” are vague and unclear.

28. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates in 2011.

Response: Plaintiffs object to Request for Admission Number28, because the undefined terms “role” and “affairs” are vague and unclear.

29. Holy Ghost Fathers International Fund #2 had no role in the affairs of P&S Associates in 2012.

Response: Plaintiffs object to Request for Admission Number29, because the undefined terms “role” and “affairs” are vague and unclear.

30. There has been no communication between Holy Ghost Fathers International Fund #2 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 Defendant Holy Ghost Fathers International Fund # 2's responses to Plaintiffs' discovery requests, Plaintiffs lack sufficient knowledge to admit or deny the Request for Admission Number 30.

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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