

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.

**FURTHER OBJECTION OF DEFENDANTS JAMES JUDD AND VALERIE JUDD TO
PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR PRODUCTION AND
MOTION FOR EXTENSION TO FURTHER RESPOND**

Out of an abundance of caution, Defendants James Judd and Valerie Judd file this objection to Plaintiff's Interrogatories and Request for Production. As grounds therefor, Defendants would respectfully show:

1. Defendants Judds' Motion to Dismiss is presently pending before this Court;
2. Defendants also believe that their Motion for Protection and Objection to Plaintiff's Interrogatories and Request for Admissions is also still pending before this court.
3. In addition, Plaintiff's complaint contains no allegation that Defendants Judds were even partners of P & S Associates.

4. Plaintiff's Interrogatories and Request for Production are unduly harassing, broad and vague and do not appear to be reasonably calculated to lead to the discovery of relevant or admissible evidence in this cause.
5. Defendants need additional time to further object to the Interrogatories and Request for Production.

Wherefore Defendants Judds object to Plaintiff's Interrogatories and Request for Production and request an extension to further set forth their objections.

Dated this 13th day of January, 2014

/s/Julian H. Kreeger
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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 Leonard Samuels, Esq. of BergerSingerman and counsel identified below registered to receive electronic notifications and regular U.S. mail upon Pro Se parties this 13th day of January, 2014 upon the following:

Notice has been electronically mailed to:

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