

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

Case No: 12-034121(07)  
Complex Litigation Unit

P&S ASSOCIATES, GENERAL PARTNERSHIP,  
et al.,

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE TRUST,  
et al.,

Defendants.

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**PLAINTIFFS' RESPONSE TO DEFENDANTS  
ABRAHAM NEWMAN, RITA NEWMAN AND GERTRUDE  
GORDON'S REQUEST FOR ADMISSIONS TO THE PLAINTIFF**

Pursuant to Florida Rule of Civil Procedure 1.370, Plaintiffs, by and through their undersigned counsel, hereby respond and object to Defendants ABRAHAM NEWMAN, RITA NEWMAN and GERTRUDE GORDON First Request for Admissions from Plaintiffs.

**RESPONSES AND OBJECTIONS**

1. Admit that the attached Schedule K-1 Form 1065 from 2004 through 2012 accurately reflect the information contained therein.

Response: Denied.

2. Admit that the information contained in the attached K-1 Form 1065 from 2004 through 2012 accurately reflect the information reported to the United States Internal Revenue Service as they relate to the partners identified therein.

Response: Plaintiffs admit that the information contained in the attached K-1 Form 1065 from 2004, and 2006 through 2009 reflect the information provided to the United States Internal Revenue Service as they relate to the partners identified therein, but deny that the information contained therein was accurate. However, Plaintiffs do not have possession, custody or control of any K-1 Form 1065 from 2010 through 2012 that was provided to the Internal Revenue Service, and to the extent that such documents exist, they are in the possession custody or control of third parties and/or Defendants and have not been produced to Plaintiffs.

3. Admit that no amendments, changes, modifications or corrections have been made to the K-1 Form 1065 attached hereto as Exhibit "A" by the Plaintiff, the Partnership or any persons acting for or on behalf of the Partnership.

Response: Admit.

Dated: January 24, 2014

By: s/ Leonard K. Samuels

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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 24th day of January, 2014, upon the following:

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