

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' FIRST INTERROGATORIES TO
PLAINTIFF S&P ASSOCIATES

Pursuant to Fla. R. Civ. P. 1.340, Defendants JAMES JUDD and VALERIE JUDD
("Defendants"), propound their attached interrogatories to Plaintiff S&P ASSOCIATES
("Plaintiff").

Dated this 26th day of March, 2014

Respectfully submitted,

/s/Julian H. Kreeger
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INTERROGATORIES

1. How much income did S & P Associates receive each year from 1995 through 2008 from its investments.

ANSWER:

2. How much income was distributed by S & P Associates to partners each year from 1995 through 2008?

ANSWER:

3. State the name and address of each CPA who audited the books and records of S & P Associates for each year from 1995 through 2008.

ANSWER:

4. As to each request for admissions, state all facts upon which you base your denial of the request for Admission.

ANSWER:

5. What funds were not invested by S & P Associates with Madoff and state:

- a. The date;
- b. How much was invested and with whom;
- c. What return was received and when.

ANSWER:

6. What statements were sent to Defendants Judd and when.

ANSWER:

7. What actions have Plaintiffs brought to recover funds invested by S & P Associates and/or P&S Associates including claims filed with Irving Picard, the appointed trustee central to the recovery of assets invested with Madoff, and for each, give the status and amount(s) of recovery to date.

ANSWER:

8. (a) Did Sullivan, Powell, Sullivan and Powell, S & P Associates, and/or P & S Associates maintain any professional liability insurance policies that were in effect between January 1, 2000 and December 31, 2008.

(b) What claims and/or actions have been brought by Plaintiffs for the recovery under such policies and what is the status of such claims (including any recovery for such claims).

ANSWER:

9. What claim or claims have Plaintiffs brought against Sullivan and Powell individually.

ANSWER:

10. State the dates and amount of each payment received by S & P Associates and P & S Associates between January 1, 2000 and December 31, 2008 from Madoff and his related entities.

ANSWER:

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 26th day of March, 2014 upon the following:

Notice has been electronically mailed to:

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By: /s/Julian H. Kreeger
JULIAN H. KREEGER
F.B.N.: 098595

STATE OF FLORIDA

COUNTY OF _____

I HEREBY CERTIFY that the foregoing Answers to Interrogatories numbered one (1) through ten (10) are true and correct.

SIGNATURE

PRINT YOUR NAME

Sworn to and subscribed before me this _____ day of _____, 2014, by _____, who is personally known to me or has produced the following identification: _____.

SIGNATURE OF NOTARY PUBLIC

Type, Print, or Stamp Commissioned Name of Notary Public