

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.

**DEFENDANT VALERIE JUDD'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' REQUEST FOR PRODUCTION**

PRELIMINARY OBJECTIONS

Defendant Valerie Judd objects to Plaintiffs' First Request for Production on the following grounds:

- A. The approximately three pages of "Definitions and Instructions" are apparent form definitions and instructions that are unduly confusing, harassing and not reasonably calculated to lead to the discovery of relevant information relating to Plaintiff's purported claims against Valerie Judd. For example, the definitions, and requests, appear to be broad enough to encompass documents relating purely to the Florida Philharmonic and the Florida Grand Opera during the 1990s, as well as the marriage of James Judd to Valerie Judd.
- B. The Requests were served before Defendants Judd were properly and validly served.
- C. The Requests purport to cover an unduly long period (twenty years) that is not relevant to any possible valid claim against Defendants Judd.
- D. The Requests specifically relate to Plaintiff's "Amended Complaint" that is no longer before this Court because Plaintiff's sought, and were granted leave, to file a Third Amended Complaint. (*See*, e.g., Requests Nos. 3, 8.)
- E. Requests such as Nos. 14 and 18 appear to be attempts to invade the attorney-client privilege or joint defense communications.

- F. As to Defendant Valerie Judd, Plaintiffs have failed to allege or attach anything that alleges that Defendant James or Valerie Judd signed any Partnership Agreement, Amended Partnership Agreement, or of document related to the Complaint.
- G. Defendant Valerie Judd further objects to the extent that Plaintiffs' form definitions are broad enough to encompass bank account statements and tax returns, including joint accounts and joint tax returns, as such broad requests are an invasion of privacy and not reasonably calculated to the discovery of relevant or admissible evidence.

RESPONSE TO REQUEST FOR PRODUCTION

Without waiving the foregoing, Defendant Valerie Judd responds to Plaintiffs' Request for Production as follows:

Defendant Valerie Judd will produce the following:

1. The sheet dated July 14, 2000 reflecting the Agreement that distributions were to be reinvested in the Partnership (also previously attached to various filings.)
2. The two checks dated in the year 2000 for the initial capital contribution.
3. The activity statements / reports (approximately 12).

Dated this 28th day of April, 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 Berger Singerman and counsel identified below registered to receive electronic notifications, and regular U.S. mail upon Pro Se parties on this 28th day of April, 2014 upon the following:

Notice has been electronically mailed to:

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By: s/ Julian H. Kreeger
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