

IN THE CIRCUIT COURT FOR THE
SEVENTEENTH 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; and S&P ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership, et al.,

Plaintiffs,

v.
JANET A. HOOKER CHARITABLE
TRUST, a charitable trust, et al.,

Defendants.

**PLAINTIFFS RESPONSE TO DEFENDANT, CONGREGATION OF THE HOLY
GHOST, WESTERN PROVINCE'S SECOND REQUEST FOR ADMISSIONS TO
PLAINTIFFS**

Plaintiffs, pursuant to Florida Rule of Civil Procedure 1.370, hereby file their responses and objections to Defendant Holy Ghost, Western Province's Second Request for Admissions and in Support thereof state:

RESPONSES AND OBJECTIONS TO REQUESTS FOR ADMISSIONS

1. The Congregation of the Holy Ghost is dissociated from the P&S partnership.

Response: Plaintiffs object to Request for Admission Number 1 because it calls for a legal conclusion.

2. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2003.

Response: Plaintiffs object to Request for Admission Number 2 because it calls for a legal conclusion.

3. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2004.

Response: Plaintiffs object to Request for Admission Number 3 because it calls for a legal conclusion.

4. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2005.

Response: Plaintiffs object to Request for Admission Number 4 because it calls for a legal conclusion.

5. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2006.

Response: Plaintiffs object to Request for Admission Number 5 because it calls for a legal conclusion.

6. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2007.

Response: Plaintiffs object to Request for Admission Number 6 because it calls for a legal conclusion.

7. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2008.

Response: Plaintiffs object to Request for Admission Number 7 because it calls for a legal conclusion.

8. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2009.

Response: Plaintiffs object to Request for Admission Number 8 because it calls for a legal conclusion.

9. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2010.

Response: Plaintiffs object to Request for Admission Number 9 because it calls for a legal conclusion.

10. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2011.

Response: Plaintiffs object to Request for Admission Number 10 because it calls for a legal conclusion.

11. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2012.

Response: Plaintiffs object to Request for Admission Number 11 because it calls for a legal conclusion.

12. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2013.

Response: Plaintiffs object to Request for Admission Number 12 because it calls for a legal conclusion.

13. The Congregation of the Holy Ghost did not participate in the affairs of the P&S partnership after December 31, 2004.

Response: Denied.

14. The Congregation of the Holy Ghost was never a partner in the co-plaintiff, S&P ASSOCIATES, GENERAL PARTNERSHIP, a Florida limited partnership.

Response: Admit

Respectfully submitted,

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 this 23rd day of June, 2014 upon the following:

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