

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.

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DEFENDANT, JESSE GOSS'S FIRST REQUEST FOR ADMISSIONS TO PLAINTIFFS

Defendant, Jesse Goss, by and through his undersigned counsel, serves this First Request for Admissions on Plaintiffs. Jesse Goss requests that, pursuant to Florida Rule of Civil Procedure 1.370, Plaintiffs provide responses within thirty (30) days of service of these Requests on counsel for Jesse Goss.

Definitions

1. "Plaintiffs" shall mean the P&S Associates, General Partnership and the S&P Associates, General Partnership.
2. "Conservator" shall mean Philip J. von Kahle, as Conservator for the Plaintiffs, P&S Associates, General Partnership and S&P Associates, General Partnership.

3. “Goss” shall mean Defendant, Jesse Goss.
4. “Partnership” or “Partnerships” shall mean collectively the Plaintiffs, P&S Associates, General Partnership and S&P Associates, General Partnership, and shall include any other named plaintiff partnership or entity.
5. “S&P partnership” shall mean the S&P Associates, General Partnership, and includes any and all agents, partners, former or current managing general partners, officers, directors, representatives, attorneys, and all others acting for or on the Partnerships’ behalf.
6. “Relevant time period” shall mean January 1, 1996 through the present.

Requests for Admissions

Admit or Deny that:

1. Jesse Goss has not contributed any money to the Partnerships since 1996.
2. There has been no activity in the Partnership capital account of Jesse Goss since 2008.
3. The Partnerships provided Jesse Goss with annual partnership records for 2008.
4. The Partnerships provided Jesse Goss with annual partnership records for 2009.
5. The Partnerships provided Jesse Goss with annual partnership records for 2010.
6. The Partnerships provided Jesse Goss with annual partnership records for 2011.
7. The Partnerships provided Jesse Goss with annual partnership records for 2012.
8. The Partnerships provided Jesse Goss with annual partnership records for 2013.
9. Beginning in 2009, the Partnerships did not provide Jesse Goss with partnership records.
10. Jess Goss is dissociated from the Partnerships.
11. Jesse Goss was dissociated from the Partnerships in 2008.

12. Jesse Goss was dissociated from the Partnerships in 2009.
13. Jesse Goss was dissociated from the Partnerships in 2010.
14. Jesse Goss was dissociated from the Partnerships in 2011.
15. Jesse Goss was dissociated from the Partnerships in 2012.
16. Jesse Goss was dissociated from the Partnerships in 2013.
17. Jesse Goss did not participate in the affairs of the Partnerships after 2008.
18. Jesse Goss was never a partner in the co-plaintiff, P&S ASSOCIATES, GENERAL PARTNERSHIP, a Florida limited partnership.

I HEREBY CERTIFY that a true copy of the foregoing was served by email this 27th day of June, 2014, to:

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