

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 PRODUCTION OF
DOCUMENTS TO PLAINTIFFS**

Defendant, Jesse Goss, by and through his undersigned counsel, and pursuant to Fl.R.Civ.P.
1.350, serves this First Request for Production of Documents.

Definitions

1. The term "Document" or "Documents" shall include, without limitation, all electronic media or other tangible forms in which the information is stored and includes all written or graphic matter of every kind and description, however produced or reproduced, whether draft or final, original or reproduction, including, but not limited to letter, correspondence, memoranda, notes, transcripts, contracts, agreements, licenses, applications, memoranda of telephone conversations or personal conversations, minutes of meetings, interoffice

communications, reports, working papers, desk calendars, appointment books, diaries, time sheets, logs, recordings or materials similar to any of the foregoing, however denominated, and including writing, drawings, graphs, photographs, charts, invoices, oral conversations, meetings, reports of telephone conversations, all video and audio recordings, microfilm, microfiche, computer disc, PowerPoint presentations, CD-ROM, computer printout or tape, data processing result, printouts and computations (both in existence and stored in memory components), and other compilations from which information can be obtained or translated, if necessary, through detective devices into reasonably usable form.

2. The term “Communications” shall mean any transmittal of information (in the form of facts, ideas, opinions, inquiries or otherwise), written, oral, electronic or otherwise, including, but not limited to, any conversation, discussion, meeting, conference or other oral statement, and any letter, correspondence, memorandum, electronic mail, instant message, telephone conversation, text message, or fax.
3. “Plaintiffs” shall mean the P&S Associates, General Partnership, and the S&P Associates, General Partnership.
4. “Conservator” shall mean Philip J. von Kahle, as Conservator for the Plaintiffs, P&S Associates, General Partnership and S&P Associates, General Partnership.
5. “Goss” shall mean Defendant, Jesse Goss.
6. “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.

7. “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.
8. “Relevant time period” shall mean January 1, 1996 through the present.

Requests for Production of Documents

1. Copies of all partnership records relating to Jesse Goss’s investment in the Partnerships, including, but not limited to, annual statements, bookkeeping and accounting records, and general ledgers.
2. Copies of all financial statements reflecting Jesse Goss’s interest in the Partnerships.
3. Copies of all statements relating to Jesse Goss’s investment in the Partnerships that were provided to him by the Partnerships.
4. Copies of all Schedule K-1’s relating to Jesse Goss’s share of the Partnership interest.
5. Copies of all Subscription Agreements entered into between Jesse Goss and the Partnerships.
6. Copies of all documents reflecting any contribution made by, or on behalf of, Jesse Goss to the Partnerships.
7. Copies of all records relating to withdrawals made by Jesse Goss from his investment in the Partnerships.
8. Copies of all documents pertaining to the Partnerships that have been received by the Conservator from Michael Sullivan, former Managing General Partner of the Partnerships, in connection with this proceeding.
9. Copies of all documents reflecting Jesse Goss’s capital account for the Partnerships.

10. Copies of all documents reflecting, or pertaining to, the Partnerships' distributions to all partners who received distributions in excess of partnership contributions ("net winners").
11. Copies of all documents relating to the decision of the Partnerships to make distributions to Jesse Goss.
12. Copies of all documents sufficient to demonstrate why the Partnerships stopped making distributions to Jesse Goss.
13. Copies of all documents sufficient to demonstrate why certain partners in the Partnerships received distributions in excess of contributions while other partners did not.
14. Copies of all documents evidencing the method used by the Partnerships to determine when, and to which partners, the distributions were made.
15. All correspondence between Jesse Goss and the Partnerships.

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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/s/ Jonathan T. Lieber

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