

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 JAMES AND VALERIE JUDD'S
NOTICE OF SERVING THIRD SET OF INTERROGATORIES TO PLAINTIFFS

Pursuant to Fla. R. Civ. P. 1.340, Defendants James and Valerie Judd (hereinafter "Defendants Judd") request plaintiffs to answer the attached interrogatories.

s/ Julian H. Kreeger
JULIAN H. KREEGER, P.A.
Florida Bar No. 098595
Attorneys for James & Valerie Judd
Offices at Grand Bay Plaza
2665 Bayshore Drive
Suite 220-14
Miami, Florida 33133
Telephone: 305-373-3101
Facsimile: 305-381-873

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 11th day of July, 2014.

Counsel	E-mail address:
Ana Hesny, Esq.	ah@assoulineberlowe.com ; ena@assoulineberlowe.com
Eric N. Assouline, Esq.	ena@assoulineberlowe.com ; ah@assoulineberlowe.com
Annette M. Urena, Esq.	aurena@dkdr.com ; cmackey@dkdr.com ; service-amu@dkdr.com
Daniel W Matlow, Esq.	dmatlow@danmatlow.com ; assistant@danmatlow.com
Debra D. Klingsberg, Esq.	dklingsberg@huntgross.com
Robert J. Hunt, Esq.	bobhunt@huntgross.com
Joanne Wilcomes, Esq.	jwilcomes@mccarter.com
Evan Frederick, Esq.	efrederick@mccaberabin.com
Etan Mark, Esq.	emark@bergersingerman.com ; drt@bergersingerman.com ; lyun@bergersingerman.com
Evan H Frederick, Esq.	efrederick@mccaberabin.com ; janet@mccaberabin.com ; beth@mccaberabin.com
B. Lieberman, Esq.	blieberman@messana-law.com
Jonathan Thomas Lieber, Esq.	jlieber@dobinlaw.com
Mariaelena Gayo-Guitian, Esq.	mguitian@gjb-law.com
Barry P. Gruher, Esq.	bgruher@gjb-law.com
William G. Salim, Jr., Esq.	wsalim@msslaw.com
Domenica Frasca, Esq.	dfrasca@mayersohnlaw.com ; service@mayersohnlaw.com
Joseph P. Klapholz, Esq.	jklap@klapholzpa.com ; dml@klapholzpa.com
Julian H Kreeger, Esq.	juliankreeger@gmail.com
L Andrew S Riccio, Esq.	ena@assoulineberlowe.com ; ah@assoulineberlowe.com
Leonard K. Samuels, Esq.	lsamuels@bergersingerman.com ; vleon@bergersingerman.com ; drt@bergersingerman.com
Marc S Dobin, Esq.	service@dobinlaw.com ; mdobin@dobinlaw.com ;
Michael C Foster, Esq.	mfooster@dkdr.com ; cmackey@dkdr.com ; kdominguez@dkdr.com
Michael Casey, Esq.	mcasey666@gmail.com
Richard T. Woulfe, Esq.	pleadings.RTW@bunnellwoulfe.com
Michael R. Casey, Esq.	mcasey666@gmail.com
Brett Lieberman, Esq.	blieberman@messana-law.com
Marc Dobin, Esq.	service@dobinlaw.com
Peter Herman, Esq.	PGH@trippscott.com
Robert J Hunt, Esq.	bobhunt@huntgross.com ; sharon@huntgross.com ; eservice@huntgross.com
Ryon M McCabe, Esq.	rmccabe@mccaberabin.com ; janet@mccaberabin.com ; beth@mccaberabin.com
Steven D. Weber, Esq.	sweber@bergersingerman.com ; lwebster@bergersingerman.com ; drt@bergersingerman.com
Thomas J. Goodwin, Esq.	tgoodwin@mccarter.com ; wendt@mccarter.com ; jwilcomes@mccarter.com
Thomas L Abrams, Esq.	tabrams@tabramslaw.com ; fcolumbo@tabramslaw.com
Thomas M. Messana, Esq.	tmessana@messana-law.com ; tmessana@bellsouth.net ; mwslawfirm@gmail.com
Zachary P Hyman, Esq.	zhyman@bergersingerman.com ; DRT@bergersingerman.com ; clamb@bergersingerman.com

By: s/ Julian H. Kreeger
JULIAN H. KREEGER
Florida Bar No. 098595

DEFENDANT JAMES AND VALERIE JUDD'S
THIRD SET OF INTERROGATORIES TO PLAINTIFFS

12. Please state what accounting services were performed for S&P Associates each year from 2000 through 2008 by Ahearn Jasco Company and/or Michael J. Kuzy, CPA, including, but not limited to, auditing, preparation of U.S. Partnership Returns of Income Form 1065 and schedule K-1.
13. For each year from 2000 through 2008, state:
- a. How much money was invested by S&P Associates
 - i. with Bernard L. Madoff Investment Securities, LLC?
 - ii. with other investments?
 - b. How much income was received by S&P Associates:
 - i. from Bernard L. Madoff Investment Securities, LLC?
 - ii. from other investments?
 - c. How much money was distributed by S&P to Partners of S&P each quarter?
 - d. How much money was re-invested by S&P Partners in S&P Capital?
 - e. How much money was distributed to the General Partners of S&P?
14. When was the first date that Plaintiffs claim that S&P made distributions to certain S&P partners that were not made from S&P profits but from principal contributions of other partners; and state to whom such distributions were made, including the dates and amounts.
15. If Plaintiffs claim that S&P Associates perpetrated a "Ponzi" scheme and/or fraud, please state:
- a. Whether you claim that it was a "Ponzi" scheme or fraud;
 - b. The date you claim that S&P Associates first perpetrated the "Ponzi" scheme or fraud and what facts support such claims;

- c. The amounts invested each year by S&P Associates with BLMIS;
- d. The amounts of payments received from BLMIS for each year from 1995 through 2008.
- e. The amounts of income received each year from BLMIS from 1995 – 2008;
- f. The amounts of income received each year from other investments made from 1995 – 2008.

16. State the names and addresses of each “net loser” of S&P and for each state:

- a. The amount and date of their initial capital investment;
- b. Whether they elected to receive quarterly distributions or chose to have their distributions reinvested as capital;
- c. The date they received each payment and/or distribution and the amount;
- d. The dates each were sent an Activity Statement and K-1 and the amount shown on each for the net realized gain and total realized balance for each for the ending capital account.

17. What actions and claims have been made by Plaintiffs, the status of each, and what recovery has been made:

- a. Against Bernard L. Madoff Investment Securities, LLC;
- b. Against Sullivan and his related entities; and
- c. Against Powell and his related entities.

ACKNOWLEDGEMENT

By: _____

Title: _____

STATE OF _____)
) SS:
COUNTY OF _____)

BEFORE ME, the undersigned authority, personally appeared
_____ who, being first duly sworn, deposes and states that
the answers to the foregoing interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me, this ____ day of _____, 2014,
by _____, who is personally known to me, or has produced
_____ as identification.

Notary Public, State of
Commission No.

My Commission Expires: