

IN THE CIRCUIT COURT OF THE 17th
JUDICIAL CIRCUIT, IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO: 12-34121(07)

PHILIP J. VON KAHLE, as Conservator of
P&S ASSOCIATES, GENERAL
PARTNERSHIP, and S&P ASSOCIATES,
GENERAL PARTNERSHIP,

Complex Litigation Unit

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE
TRUST, et al,

Defendants.

**DEFENDANTS JAMES AND VALERIE JUDD'S SUPPLEMENTAL
MOTION TO COMPEL**

Defendants/Counter-Plaintiffs James and Valerie Judd supplement their Motion to Compel to include their Second and Third Interrogatories and Second and Third Requests for Production. As grounds therefore, movants would respectfully show:

1. Defendants/Counter-Plaintiffs Judds' Amended Counterclaim is not presently at issue.
2. Plaintiffs/Counter-Defendants have objected to including portions of the Pretrial Stipulation that relate to Defendants/Counter-Plaintiffs Judd.
3. On May 23, 2014, Defendants/Counter-Plaintiffs Judd served Second Requests for Admissions, Interrogatories and Request for Production.
4. Plaintiffs/Counter-Defendants have not responded to this discovery, although they did file a Motion for Protective Order on June 30, 2014 that is pending before the Court.

5. On July 11, 2014, Defendants/Counter-Plaintiffs Judd served their Third Request for Admissions, Interrogatories, and Request for Production.
6. To date, Plaintiffs/Counter-Defendants have not responded to this discovery.

Wherefore, Defendants/Counter-Plaintiffs Judd respectfully pray for an order providing:

- a. That the Second and Third Request for Admissions are deemed admitted;
- b. Directing Plaintiffs/Counter-Defendants to answer the Second and Third Interrogatories forthwith; and
- c. Directing Plaintiffs/Counter-Defendants to produce all documents requested forthwith.

Respectfully submitted,

s/ Julian H. Kreeger
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 Valerie Judd
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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 15th day of August, 2014 upon the following:

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