

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> 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,

v.

JANET A. HOOKER CHARITABLE  
TRUST, et al,

Defendants.

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**DEFENDANT JULIANNE M. JONES (a/k/a JULIANNE MATARAGAS')**  
**MOTION FOR CONTINUANCE OF TRIAL**

Defendant, JULIANNE M. JONES (a/k/a JULIANNE MATARAGAS), hereby files her Motion for Continuance of the trial of this case, and states:

1. This case is currently scheduled for trial before this Court beginning on Monday, September 8, 2014.
2. This case is not ready for trial for the following reasons:
  - a. The answer was deemed filed on August 15, 2014. The trial was set prior to that date because of the nature of the proceedings.
  - b. No discovery has been taken.
  - c. The final case management hearing was held on Wednesday, September 3, 2014.
  - d. No pretrial was completed by the parties.
  - e. Defendant has asked to complete further discovery and has requested all trial exhibits at the case management conference.
  - f. Plaintiff was not able to represent that all exhibits it intends to use at trial had, in fact, been previously produced.

g. Further discovery may need to be taken once the exhibits are identified and preliminary depositions have been taken.

h. While initially the Defendant believed that the initial trial setting was manageable, circumstances beyond her control have caused the timeframe allotted between the time the answer was filed and the setting of the trial is insufficient to properly prepare the case for trial at this point.

WHEREFORE, for the above-stated reasons, Defendant JULIANNE MATARAGAS respectfully requests an order continuing the trial for a short amount of time, and for such other relief as this Court deems just and proper.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-filing to Leonard K. Samuels, Esq., Etan Mark, Esq., Steven D. Weber, Esq., at Berger Singerman LLP, 350 East Las Olas Boulevard, Suite 1000, Fort Lauderdale, FL 33301, [lsamuels@bergersingerman.com](mailto:lsamuels@bergersingerman.com), [emark@bergersingerman.com](mailto:emark@bergersingerman.com), [sweber@bergersingerman.com](mailto:sweber@bergersingerman.com), this 5th day of September, 2014.

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