

IN THE CIRCUIT COURT FOR THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

PHILIP J. VON KAHLE, as Conservator of
P&S Associates, General Partnership and
S&P Associates, General Partnership

Case No. 12-034123 (07)
Complex Litigation Unit

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,
Defendants.

DEFENDANT STEVEN F. JACOB'S ANSWERS TO
PLAINTIFFS' SECOND SET OF INTERROGATORIES

Defendant, STEVEN F. JACOB, by and through undersigned counsel, answers Plaintiff's Second Set of Interrogatories, served August 11, 2015, as follows:

Interrogatory No. 1: Identify and describe any documents related to Guardian Angel which were destroyed by You after December 11, 2008, and for each document identified in response to this Interrogatory, state the date (if known) or approximate date that document was destroyed.

Response: The word "destroyed" is not defined; therefore, as I interpret the term "destroyed", I would object to the question as stated, as I don't believe the documents were destroyed.

Interrogatory No. 2: Identify and describe any documents related to SPJ which were destroyed by You after December 11, 2008, and for each document identified in response to this Interrogatory, state the date (if known) or approximate date that document was destroyed.

Response: The word "destroyed" is not defined; therefore, as I interpret the term "destroyed", I would object to the question as stated, as I don't believe the documents were destroyed.

Interrogatory No. 3: Describe how you destroyed the documents identified in response to Interrogatories Nos. 1 and 2 above.

Response: The word "destroyed" is not defined; therefore, as I interpret the term "destroyed", I would object to the question as stated, as I don't believe the documents were destroyed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of September, 2015, the foregoing document is being e-served on all counsel of record on the attached service list.

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ACKNOWLEDGEMENT

By: _____
Title: _____

STATE OF Florida)
) SS:
COUNTY OF Broward)

BEFORE ME, the undersigned authority, personally appeared Steven Jacob as _____ of Defendant Steven Jacob 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 9th day of September, 2015, by Steven Jacob, who is personally known to me or _____ has produced _____ as identification.

Ellen Eckblad
Notary Public, State of
Commission No.

My Commission Expires:

