

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.

**DEFENDANTS JAMES AND VALERIE JUDD'S MOTION TO ENFORCE
SETTLEMENT AGREEMENT**

Defendants, James and Valerie Judd move to enforce Plaintiffs' settlement agreement in accordance with the agreement described in the email from Plaintiffs' counsel Zachary Hyman, Esq., a copy of which is attached hereto as Exhibit A.

That agreement called for payment of a sum certain provided that financial statements would be provided that were consistent with the financial representations made regarding the Judds' financial condition. Consistent with these financial representations and pursuant to the agreement referenced by Mr. Hyman, these statements have been provided.

The Court should be apprised that Stephen Weber, Esq. subsequently disclaimed the agreement stated by Mr. Hyman and denies the existence of such a tentative agreement.

Wherefore Defendants Judd pray for the Court to stay further proceedings against Defendants James and Valerie Judd and to enter an order enforcing the settlement agreement.

Respectfully submitted,

s/ Julian H. Kreeger
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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 23rd day of September, 2014 upon the following:

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By: _____ s/ Julian H. Kreeger
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Judd Defendants Settlement and Financials

Mon, Sep 1, 2014 at 1:12 PM

Zachary P. Hyman <ZHyman@bergersingerman.com>

To: "juliankreeger@gmail.com" <juliankreeger@gmail.com>

Cc: "Steven D. Weber" <SWeber@bergersingerman.com>

Mr. Kreeger,

It is my understanding that we have reached a tentative settlement based on your clients' execution of financial affidavits. Because the settlement eliminates a need to respond to the outstanding discovery, please let us know if you are willing to consent to an extension to respond to the outstanding discovery, up to and until this Friday, September 5, 2014. We were also wondering when we should expect your return of the financial documents.

Thank you,

Zachary Hyman



Zachary P Hyman

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