

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

CASE NO.: 12-028324 (07)
Complex Litigation Unit

P & S ASSOCIATES, GENERAL
PARTNERSHIP and S & P ASSOCIATES
GENERAL PARTNERSHIP,

Plaintiff,

v.

ROBERT P. ALVES, ET AL.,

Defendant.

ANSWER TO THIRD AMENDED COMPLAINT
FOR INTERPLEADER AND DECLARATORY RELIEF

Defendant, ETTOH LTD. (“Ettoh”), through the undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.110, *et seq.*, hereby answers the Third Amended Complaint for Interpleader and Declaratory Relief (the “Third Amended Complaint”), asserts its affirmative defenses and demands trial by jury, stating as follows:

1. Defendant admits only that this Court has personal jurisdiction over it and that subject matter jurisdiction is appropriate in this Court. Defendant otherwise denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 1 of the Third Amended Complaint.

2. Defendant admits only that venue is proper before this Court. Defendant otherwise denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 2 of the Third Amended Complaint.

3. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 3 of the Third Amended Complaint.

4. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 4 of the Third Amended Complaint.

5. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 5 of the Third Amended Complaint.

6. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 6 of the Third Amended Complaint.

7. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 7 of the Third Amended Complaint.

8. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 8 of the Third Amended Complaint.

9. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 9 of the Third Amended Complaint.

10. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 10 of the Third Amended Complaint.

11. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 11 of the Third Amended Complaint.

12. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 12 of the Third Amended Complaint.

13. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 13 of the Third Amended Complaint.

14. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 14 of the Third Amended Complaint.

15. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 15 of the Third Amended Complaint.

16. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 16 of the Third Amended Complaint.

17. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 17 of the Third Amended Complaint.

18. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 18 of the Third Amended Complaint.

19. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 19 of the Third Amended Complaint.

20. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 20 of the Third Amended Complaint.

21. Defendant denies the allegations contained in paragraph 21 of the Complaint.

22. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 22 of the Third Amended Complaint.

23. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 23 of the Third Amended Complaint.

24. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 24 of the Third Amended Complaint.

25. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 25 of the Third Amended Complaint.

26. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 26 of the Third Amended Complaint.

27. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 27 of the Third Amended Complaint.

28. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 28 of the Third Amended Complaint.

29. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 29 of the Third Amended Complaint.

30. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 30 of the Third Amended Complaint.

31. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 31 of the Third Amended Complaint.

32. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 32 of the Third Amended Complaint.

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53. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 53 of the Third Amended Complaint.

54. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 54 of the Third Amended Complaint.

55. Ettoh admits only that it conducts business in Broward County, Florida. Ettoh otherwise denies the allegations contained in paragraph 55 of the Third Amended Complaint.

56. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 56 of the Third Amended Complaint.

57. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 57 of the Third Amended Complaint.

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250. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 250 of the Third Amended Complaint.

251. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 251 of the Third Amended Complaint.

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352. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 352 of the Third Amended Complaint.

353. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 353 of the Third Amended Complaint.

354. Defendant defers to the referenced documents as the best evidence of their contents and application, and otherwise denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 354 of the Third Amended Complaint.

355. Defendant denies the allegations contained in paragraph 355 of the Third Amended Complaint.

356. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 356 of the Third Amended Complaint.

357. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 357 of the Third Amended Complaint.

358. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 358 of the Third Amended Complaint.

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371. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 371 of the Third Amended Complaint.

372. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 372 of the Third Amended Complaint.

373. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 373 of the Third Amended Complaint.

374. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 374 of the Third Amended Complaint.

THE CONTROVERSY

375. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 375 of the Third Amended Complaint.

376. Defendant denies that the distribution methodology provided for by the agreements described in paragraph 376 of the Third Amended Complaint is complete and/or

accurate and defers to the referenced documents as the best evidence of their contents and application.

377. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 377 of the Third Amended Complaint.

378. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 378 of the Third Amended Complaint.

379. Defendant denies the allegations contained in paragraph 379 of the Third Amended Complaint.

380. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 380 of the Third Amended Complaint.

381. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 381 of the Third Amended Complaint.

382. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 382 of the Third Amended Complaint.

COUNT I
DECLARATORY RELIEF

383. Defendant adopts and incorporates by reference its responses to the allegations set forth above in response to paragraph 383 of the Third Amended Complaint.

384. Defendant admits the existence of the referenced Act, but denies that it is applicable and denies all further allegations contained in paragraph 384 of the Third Amended Complaint.

385. Defendant denies the allegations contained in paragraph 385 of the Third Amended Complaint.

386. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 386 of the Third Amended Complaint.

COUNT II
INTERPLEADER

387. Defendant adopts and incorporates by reference its responses to the allegations set forth above in response to paragraph 387 of the Third Amended Complaint.

388. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 388 of the Third Amended Complaint.

389. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 389 of the Third Amended Complaint.

390. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 390 of the Third Amended Complaint.

391. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 391 of the Third Amended Complaint.

COUNT III
INJUNCTION

392. Defendant adopts and incorporates by reference its responses to the allegations set forth above in response to paragraph 392 of the Third Amended Complaint.

393. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 393 of the Third Amended Complaint.

394. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 394 of the Third Amended Complaint.

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401. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 401 of the Third Amended Complaint.

402. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 402 of the Third Amended Complaint.

403. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 403 of the Third Amended Complaint.

404. Defendant denies knowledge or information sufficient to form a belief with regard to the truth of the allegations contained in paragraph 404 of the Third Amended Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

405. Counts I and III of the Third Amended Complaint fail to allege the elements of the causes of action they purport to plead and, thus, fail to state a causes of action upon which relief can be granted.

Second Affirmative Defense

406. The obligations of the parties are defined by the partnership agreements described in the Complaint, and the Plaintiff has not alleged a basis under Florida law to invoke an equitable rule to govern administration of the partnerships, including, distribution of any proceeds owed to the partnerships.

DEMAND FOR JURY TRIAL

407. Defendant demands trial by jury of all issues triable as of right by jury.

DENIAL OF ALLEGATIONS NOT ADMITTED

408. Each and every allegation contained in the Third Amended Complaint, whether in a numbered paragraph or elsewhere, that is not specifically admitted is denied and strict proof thereof is demanded.

Dated this 1st day of October, 2013.

Respectfully submitted,

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By: /s/ Michael C. Foster
Michael C. Foster
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Annette M. Urena
Florida Bar No. 14838

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was via electronic mail this 1st day of October, 2013 upon all counsel on the attached Service List.

/s/ Michael C. Foster
Michael C. Foster

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