

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

IN THE CIRCUIT COURT OF THE 17<sup>th</sup>  
JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA  
CASE NO. 12-028324 (07)  
COMPLEX LITIGATION UNIT

Plaintiff,

v.

ROBERTA P. ALVES, ET AL.,

Defendants.

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**CONSERVATOR'S RESPONSE TO FESTUS & HELEN STACY  
FOUNDATION, INC.'S AFFIRMATIVE DEFENSES**

Philip J. von Kahle (the "Conservator"), as Conservator for P&S Associates, General Partnership ("P&S") and S&P Associates, General Partnership ("S&P") (together, the "Partnerships"), by and through undersigned counsel, hereby files the Conservator's Response to Festus & Helen Stacy Foundation, Inc.'s Affirmative Defenses, and in support thereof states as follows:

**FIRST AFFIRMATIVE DEFENSE**

1. Conservator denies the factual allegations and demands strict proof thereof.

**SECOND AFFIRMATIVE DEFENSE**

2. Conservator denies the factual allegations and demands strict proof thereof.

**THIRD AFFIRMATIVE DEFENSE**

3. Conservator denies the factual allegations and demands strict proof thereof.

Dated: November 6, 2013

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