

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

Case No. 12-34121 (07)
Complex Litigation Unit

P&S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited
partnership; and S&P ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership, et al.,

Plaintiffs,

v.

JANET A. HOOKER CHARITABLE
TRUST, a charitable trust, et al.,

Defendants.

**DEFENDANT, CONGREGATION OF THE HOLY GHOST, WESTERN PROVINCE'S
FIRST REQUEST FOR ADMISSIONS TO PLAINTIFFS**

Defendant, Congregation of the Holy Ghost, Western Province (“Congregation of the Holy Ghost”), by and through its undersigned counsel, serves this First Request for Admissions on Plaintiffs. The Congregation of the Holy Ghost requests that, pursuant to Florida Rule of Civil Procedure 1.370, Plaintiffs provide responses within thirty (30) days of service of these Requests on counsel for the Congregation of the Holy Ghost.

Definitions

1. “Plaintiffs” shall mean the P&S Associates, General Partnership and the S&P Associates, General Partnership.
2. “Conservator” shall mean Philip J. von Kahle, as Conservator for the Plaintiffs, P&S

Associates, General Partnership and S&P Associates, General Partnership.

3. “Congregation of the Holy Ghost” shall mean Defendant, Congregation of the Holy Ghost, Western Province.
4. “Partnerships” shall mean collectively the Plaintiffs, P&S Associates, General Partnership and S&P Associates, General Partnership.
5. “P&S partnership” shall mean the P&S Associates, General Partnership, and includes any and all agents, partners, former or current managing general partners, officers, directors, representatives, attorneys, and all others acting for or on its behalf.
6. “Relevant time period” shall mean January 1, 1992 through the present.

Requests for Admissions

Admit or Deny that:

1. The Congregation of the Holy Ghost received a distribution from P&S partnership on January 31, 2003.
2. The Congregation of the Holy Ghost has not received a distribution from the P&S partnership since January 31, 2003.
3. The Congregation of the Holy Ghost has not contributed any money to the P&S partnership since October 22, 1996.
4. There has been no activity in the capital account of the Congregation of the Holy Ghost since January 31, 2003.
5. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2003.

6. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2004.
7. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2005.
8. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2006.
9. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2007.
10. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2008.
11. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2009.
12. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2010.
13. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2011.
14. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2012.
15. The P&S partnership provided the Congregation of the Holy Ghost with annual partnership records for 2013.

16. Beginning in 2009, the P&S partnership did not provide the Congregation of the Holy Ghost with partnership records.
17. The P&S partnership never provided the Congregation of the Holy Spirit Province of the United States with partnership records.
18. The P&S partnership never received any contribution from the Congregation of the Holy Spirit Province of the United States.
19. The P&S partnership never made any distributions to the Congregation of the Holy Spirit Province of the United States.
20. The Congregation of the Holy Spirit Province of the United States is not a partner in P&S partnership.
21. The Congregation of the Holy Ghost is dissociated from the P&S partnership.
22. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2003.
23. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2004.
24. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2005.
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30. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2011.
31. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2012.

32. The Congregation of the Holy Ghost was dissociated from the P&S partnership in 2013.
33. The Congregation of the Holy Ghost did not participate in the affairs of the P&S partnership after December 31, 2004.
34. The Congregation of the Holy Ghost was never a partner in the co-plaintiff, S&P ASSOCIATES, GENERAL PARTNERSHIP, a Florida limited partnership.

I HEREBY CERTIFY that a true copy of the foregoing was served by email this 22nd day of November, 2013, to:

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