

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 SET OF INTERROGATORIES TO PLAINTIFFS**

For the purpose of these Interrogatories, the following words shall have meaning indicated below:

1. As used herein, the terms, "you" and "your" include the above-named Plaintiffs or any agent of same.
2. As used herein, the term "person" includes any corporation, partnership or other business entity/association, natural person, and any governmental body, commission board or agency.
3. As used herein, the term "identify" when used in reference to a natural person means to state his/her full name, present address and telephone number, if known, and his/her present employment and business affiliation. When used in reference to a person other than a natural person, the term "identify" means to state whether such person is a corporation, partnership or other organization, and the name present and last known address, and principal place of its business. Once any person has been properly identified, it shall be sufficient thereafter when identifying the same person to state its/his/her name only.

4. As used herein, the term "identify" when used in reference to a document, means to state the date, author, (or, if different, the signer or signers), the addressee, type of document (e.g., letter, memorandum, telegram, chart, sketch, diagram, etc.), and any other means of identifying the document with sufficient particularity to meet the requirements of its inclusion in a Request for Production pursuant to Florida Rule of Civil Procedure Section 1.350. If any such document was but is no longer in your possession or subject to your control, state what disposition was made of it and the reason for such disposition. In lieu of identifying a document, a true and correct copy thereof may be annexed to and incorporated in your answers to the interrogatories.

5. As used herein, the term "document" or "documents" includes, but is not limited to any writing, whether written, typed, printed or marked in any way, drawings, graphs, charts, recording tapes or wires, films, photographs, movies or any graphic matter however produced or reproduced, all mechanical electronic sound recordings and transcripts thereof, and other data complications from which information can be obtained and/or translated, if necessary, by you through detection devices in to reasonably usable form.

6. As used herein, the term "Congregation of the Holy Ghost" shall mean Defendant, Congregation of the Holy Ghost, Western Province.

7. As used herein, the term "P&S partnership" shall mean the Plaintiff, 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.

INTERROGATORIES

1. Identify the reasons for the P&S partnership to make distributions to the Congregation of the Holy Ghost.

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8. Explain the purpose for the payment of \$217,000 on July 16, 2002, to Holy Ghost by P&S partnership.

P&S Associates, General Partnership

by: _____
Its: _____
Date: _____

STATE OF _____

COUNTY OF _____

The foregoing instrument was acknowledged before me this _____ day of _____,
2013 by _____, who is personally known to me or has produced
_____ as identification, and who did/did not take an oath.

NOTARY PUBLIC

(Printed Name)

My Commission Expires:

Notary Seal