

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. _____ /

**PLAINTIFFS' RESPONSE TO DEFENDANT ROBERT A. UCHIN REVOCABLE
TRUST'S REQUEST FOR ADMISSIONS**

Plaintiff, PHILIP J. VON KAHLE, as Conservator of P&S ASSOCIATES, GENERAL PARTNERSHIP, and S&P ASSOCIATES, GENERAL PARTNERSHIP, pursuant to Florida Rule of Civil Procedure 1.370, admits or denies the following:

1. The Conservator admits Request for Admission Number 1 to the extent that it requests that the Conservator admit that Margaret J. Smith sent the Robert A. Uchin Revocable Trust a two page letter on November 13, 2012, with an Exhibit A attached thereto. The Conservator admits the aforementioned Exhibit detailed the funds contributed and disbursed from the Robert A. Uchin Revocable Trust's capital account with P&S General Partnership from December 1992 through December 2008.

2. The Conservator denies that the Robert A. Uchin Revocable Trust invested \$150,000 in P&S Associates, General Partnership on December 17, 2003 because the Robert A.

Uchin Revocable Trust invested \$150,000 in P&S Associates, General Partnership on December 16, 2003.

3. The Conservator denies that the Robert A Uchin Revocable Trust invested \$50,000 in P&S General Associates, General Partnership on February 27, 2004, because the Robert A. Uchin Revocable Trust invested \$50,000 on February 2, 2004.

4. The Conservator denies that the Robert A Uchin Revocable Trust invested \$50,000 in P&S General Associates, General Partnership on August 21, 2004 because the Robert A. Uchin Revocable Trust invested \$150,000 on August 30, 2004.

5. The Conservator denies that the P&S Associates, General Partnership made a disbursement to the Robert A. Uchin Revocable Trust on October 3, 2007, because P&S Associates, General Partnership disbursed \$100,000 to the Robert A. Uchin Revocable Trust on September 31, 2007.

6. The Conservator denies that the P&S Associates, General Partnership made a disbursement of \$238,751.56 to the Robert A. Uchin Revocable Trust on January 7, 2008, because P&S Associates, General Partnership disbursed \$238,751.56 to the Robert A. Uchin Revocable Trust on December 31, 2007.

7. The Conservator denies that the P&S Associates, General Partnership made a disbursement of \$4,195.05 to the Robert A. Uchin Revocable Trust on January 23, 2008, because P&S Associates, General Partnership made a disbursement of \$4,195.05 to the Robert A. Uchin Revocable Trust on January 17, 2008.

8. The Conservator admits Request for Admission Number 8.

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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 counsel registered to receive electronic notifications and regular U.S. mail upon *Pro Se* parties this 27th day of November, 2013 upon the following:

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