

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

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

CASE NO.: 12-028324 (07)

Plaintiffs,

vs.

ROBERTA P. ALVES, et al.

Defendants.

\_\_\_\_\_/

**DEFENDANT, DENSEL L. RAINES, ANSWER TO PLAINTIFF'S  
FOURTH AMENDED COMPLAINT FOR INTERPLEADER AND  
DECLARATORY RELIEF**

Defendant, DENSEL L. RAINES ("Raines"), a partner in SPJ Investments, Ltd., and Defendant, SPJ Investments, Ltd. ("SPJ"), which is a partner of S&P Partnership, and is domiciled in Palm Beach County, by and through its undersigned attorneys, answers Plaintiff's Fourth Amended Complaint for Interpleader and Declaratory Relief, and says:

1. In 2002 Raines invested \$104,217.00 in SPJ.
2. Raines received a final statement on December 31, 2008 indicating that the initial investment was now worth \$182,982.51. This final statement indicated a \$1,000.00 withdrawal (which Raines did not receive) and several other miscellaneous expenses which equaled a stated investment account balance as of that date.
3. Raines received no distributions between the date of the initial investment and the answer filed herein. Raines net investment loss is \$103,217.00. Any recovery should be based upon that net loss amount.
4. Raines admits the allegations contained in paragraph 457. In addition Raines admits the allegations contained in paragraphs 467 through 509 as well as the allegations contained in paragraphs 533 through 542.
5. Raines is without knowledge with respect to the remaining allegations contained in the amended complaint.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing was sent via email this 13th day of December, 2013 to Thomas M. Messana, Esq., Messana, P.A., Post Office Drawer 2485, Fort Lauderdale, FL 33303, [tmessana@messana-law.com](mailto:tmessana@messana-law.com).

Dickenson, Murphy, Rex & Sloan  
Attorneys for Defendant GSBT  
150 E. Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Telephone: (561) 391-1900  
Facsimile: (561) 391-1933

*/s/ T.N. Murphy, Jr.* \_\_\_\_\_

T. N. Murphy, Jr., Esq.  
Florida Bar No. 138365  
tmurphy@dmrslaw.com