

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

WILLIAM E. STANSBURY,
Plaintiff,

v.

CASE NO. 502012CA013933XXXXMB (AK)

ESTATE OF SIMON L.
BERNSTEIN and BERNSTEIN
FAMILY REALTY, LLC,
Defendants.

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**PLAINTIFF'S SUPPLEMENTAL RESPONSE TO DEFENDANTS'
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, WILLIAM E. STANSBURY ("Stansbury"), by and through his undersigned counsel, and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, and hereby files his Supplemental Response to Defendant, ESTATE OF SIMON L. BERNSTEIN, Request for Production of Documents, dated June 22, 2017, as follows:

GENERAL OBJECTIONS

1. Stansbury objects to the instructions and definitions set forth in the Discovery to the extent they purport to place any obligation upon Stansbury beyond what is required by the Florida Rules of Civil Procedure.

2. In responding to the Discovery, Stansbury does not concede the relevance or materiality of the information requested nor of the subject matter to which the Discovery refers. Rather, the responses to any discovery requests are made expressly subject to, and without in any way waiving or intending to waive, any question or objection as to competency, relevancy, privilege, or admissibility in evidence of any of the matters referred to or responses given herein. Stansbury reserves all trial objections.

3. Stansbury objects to the Discovery to the extent that responsive information is protected by the attorney/client privilege, or were prepared by Stansbury, his consultants, principals, agents, or attorneys in anticipation of litigation or for trial, and/or constitute privileged work product. Stansbury will withhold information protected by the attorney/client and work/product privileges and all responses will be subject to that limitation.

4. These General Objections apply to each specific discovery request unless stated otherwise. Reiteration of any General Objection in response to a specific discovery request shall not be construed to limit the applicability of any other General Objection.

RESPONSES TO REQUEST FOR PRODUCTION

1. With regard to Requests numbered 4, 6 and 11, without waiving said objections, please see the attached Bates Stamped documents numbered WSEB-00138 and WSEB-00139.



Peter M. Feaman, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by electronic service through the E-filing Portal to Email: Alan Rose, Esq., PAGE, MRACHEK, 505 So. Flagler Drive, Suite 600, West Palm Beach, FL 33401, arose@pm-law.com and mchandler@pm-law.com; and Eliot Bernstein, as natural guardians of Joshua, Jake and Daniel Bernstein (for Defendant, Bernstein Family Realty, LLC) 2753 Northwest 34th Street, Boca Raton, FL 33434, Email: ivewit@ivewit.tv; ivewit@gmail.com, on this 13th day of November, 2017.

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By: 
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