

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.

/

**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 13 day of November, 2017.

PETER M. FEAMAN, P.A.
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By: 
Peter M. Feaman
Florida Bar No. 0260347

FW: structure moving forward

Bill Stansbury <bill@lifeinsuranceconcepts.com>

Fri 6/1/2012 10:57 AM

William E. Stansbury CLU, ChFC

Life Insurance Concepts
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-----Original Message-----

From: Bill Stansbury
Sent: Monday, March 19, 2012 9:00 AM
To: Ted Bernstein; Simon Bernstein; Ransom Jones
Subject: RE: structure moving forward

Ted - Eileen is off this week on spring break and we have planned a few things with the grandchildren that will have me out of the office this week - i could be available on Thursday however if that is the best day for the rest of the group. Anytime next week is fine. The continuation of our prior discussions is important and i believe we need to allocate an appropriate amount of time and try to come to some agreement with regard to the business moving forward. As you, Si and I discussed several weeks ago, there seems to be a significant gap between what my salary payments should have been since 2008 and what was actually paid in salary to me. I am basing this belief on the company net retained commission reports as well as the analysis of shareholder salaries that Ransom prepared and distributed for our meeting several weeks ago. Si mentioned that he would speak with Jerry - i'm not sure what purpose that would serve as Jerry was never a part of our compensation discussions, but i have heard nothing since. Let me know when everyone's schedule is open.

Thanks,
Bill

From: Ted Bernstein
Sent: Saturday, March 17, 2012 1:43 PM
To: Simon Bernstein; Bill Stansbury; Ransom Jones
Subject: structure moving forward

Recognizing that everyone is busy, I think it is important that we continue our discussions about compensation and individual roles in the sales process and at the company level. I will try and schedule a meeting for the end of this upcoming week or the

week after.

Ted
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