

IN THE CIRCUIT COURT OF THE 15<sup>TH</sup> JUDICIAL CIRCUIT OF FLORIDA  
IN AND FOR PALM BEACH COUNTY, CASE NO. 50-2018-CA-002317-  
XXXX-MB

WALTER E. SAHM and  
PATRICIA SAHM,

Plaintiffs,

vs.

BERNSTEIN FAMILY REALTY, LLC., etal.,

Defendants

---

**MOTION TO VACATE DEFAULT**

Defendants Joshua Bernstein and Jacob Bernstein, by and through undersigned attorney, move the Court to vacate and set aside the June 1, 2020 Default since, at the time of the Default, Candice could not appear, or even be referred to, as “natural guardian” for Joshua and Jacob (contrary to the wording of the Default and style of the case) since Joshua and Jacob were each adults, not minors, and not subject to service through Candice, as is wrongly indicated in the Default, nor were Joshua and Jacob minors even as of the time when suit was commenced and neither Joshua nor Jacob have been served or otherwise been made parties to this action.

ARTHUR J. MORBURGER  
19 W.Flagler St. Ste. 404 Miami, FL 33130  
Tel. No. (305) 374-3373  
[Amorbarger@bellsouth.net](mailto:Amorbarger@bellsouth.net)  
Fla. Bar No. 157287  
\_\_\_\_/s/*Arthur J. Morburger*\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served by email via the Florida Eportal Filing System this 12<sup>th</sup> day of October, 2020.

\_\_\_\_/s/*Arthur J. Morburger*\_\_\_\_\_