

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

Hon John S Kastrenakes (“JSK”)

CASE NO.: 50-2018-CA-00231 7-XXXX-MB

WALTER E. SAHM and  
PATRICIA SAHM

Plaintiffs/Petitioners,

v

BERNSTEIN FAMILY REALTY, LLC,  
BRIAN O’CONNELL, AS SUCCESSOR PERSONAL REPRESENTATIVE OF THE ESTATE  
OF SIMON L. BERNSTEIN; ALEXANDRA BERNSTEIN, ERIC BERNSTEIN, MICHAEL  
BERNSTEIN, MOLLY SIMON, PAMELA B. SIMON, JILL IANTONI, MAX FRIEDSTEIN,  
LISA FRIEDSTEIN, INDIVIDUALLY AND TRUSTEES OF THE SIMON L. BERNSTEIN  
REVOCABLE TRUST AGREEMENT DATED MAY 20, 2008, AS AMENDED AND  
RESTATED; ELIOT BERNSTEIN, AND CANDICE BERNSTEIN, INDIVIDUALLY AND  
AS NATURAL GUARDIANS OF MINOR CHILDREN JO., JA. AND D. BERNSTEIN; AND  
ALL UNKNOWN TENANTS.

Defendants/Respondents.

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**Defendants’/Respondents’ Bull’s Eye Cross Motion also as Written Oral Arguments  
Required by Law on Summary Judgment in Responsive Answer to  
Plaintiffs’/Petitioners’ Motion for Entry of Default Judgment**

**Date and Time of Hearing: May 28, 2020 at 08:30 AM  
Zoom Meeting ID: 934 894 2946 / <http://US02WEB.ZOOM.US/J/9348942946>**

With due respect to the Court under penalties of perjury, *Pro Se* Defendants/Respondents,  
as mandated by laws correctly applied and supporting evidence that proves the truth, the whole  
truth and nothing but the truth (“**100% TRUTH**”) as follows:

**A Opening Legal Statements**

1 Defendants are *Candice Bernstein* Individually and as a Natural Guardian  
 (“*Mother*”) of Minor Children **JO., JA.** and **D.** Bernstein (“*Family*”) living with Natural Guardian  
 Eliot Bernstein (“*Father*”) and thus *collectively* the *Eliot Bernstein Family* (“*EBFamily*”).

**B Legal Statements In between Opening Legal Statements and Closing Legal Conclusions**

2 Plaintiffs’ Filing # 107653196 E-Filed 05/19/2020 09:13:22 AM includes one too  
many *legal lies* made by duly licensed lawyers as proof that “*lawyers*” and “*liars*” are *synonyms*  
 claiming *four* instead of *two* extension requests by Defendants without serving and filing *copies*  
 of *four* extension requests with their Motion for Default Judgment to make *EBFamily homeless*:

- 2.1 In Pl. ¶4, Defs.’ March 24, 2020 Emergency Motion for Extension of Time is a ***duplicate*** of Defs.’ March 20, 2020 Motion for Extension of Time (“***Ext. Motion No 1***”).
- 2.2 In Pl. ¶ 5, Defs.’ April 25, 2020 Motion for Extension of Time in response to which “Plaintiffs agreed to a twenty-day extension...to May 18, 2020” making ***Ext. Motion No 2 100% moot as if never filed.***
- 2.3 In Pl. ¶ 6, Defs.’ May 11, 2020 Motion for Extension of Time was forced to be filed by Defs. (“***Ext. Motion No 2***”) since ***Plaintiffs intentionally failed*** to prepare, serve and file with Court ***mutually agreed upon “AGREED ORDER” above extension of time to make it legally valid and enforceable.***
- 2.4 In Pl. ¶ 7, “[i]t is clear the Defendant has no intention of complying with the Court and will not file a Response to the Third Amended Complaint” ***is*** Plaintiffs’ ***ultimate lie*** to win a Default Judgment as judicial evidence of ***legal liars*** forcing Courts to become ***judicial liars*** and keep conspiring with ***lawyers and liars alike and keep the lying industry surviving.***

### **C Closing Legal Conclusions**

3 Granting Plaintiffs’ Motion for Entry of Default Judgement ***is*** self-proving evidence of Court ***acting above the law committing Miscarriages of Justice aka Justicide*** making it a ***nullity*** and its enforcers ***Outlaws*** with no executive immunity from restituting their injureds.

4 Granting Defendants’ Motion for Entry of Summary Judgement ***is*** self-proving evidence of Court ***acting under the law making Justice prevent Justicide*** by its Court Order for Defendants to file their Response ***within 30 days after the date as of which the COVID #19 stay home mandate is lifted and/or*** primary Defendant, Bernstein Family Realty, LLC (***BFR***) in the lawsuit is also legally served by Plaintiffs to file an Answer, etc. ***but for which lying Plaintiffs and their lying lawyers are self-proving evidence of lying industry approved by rogues-in-robes.***

5 ***By law, a 100% stay on the case and on all depositions and other responses*** is required to be ordered until such time that legal processes are served on ***ALL*** parties still not served yet and until Court’s Order is passed on Defs.’ ***Ext. Motion No 2.***

### **D World’s First Legal Alert for Judicial Self-Protection from Lawyers and Liars Alike**

6 ***By law***, please take judicial notice of this ***World’s First Legal Alert for Judicial Self-Protection from Lawyers and Liars Alike in the self-damning lying industry*** as follows:

- 6.1 Defendants were forced by the lying industry to duly file their ***Lis Pendens*** with required attachments of 20 pages to help lying Plaintiffs and Lawyers and Liars Alike ***stop violating laws against benefiting from their own wrongs*** like lying and relying on lying and thus ***stop forcing rogues-in-robes from conspiring with Lawyers and Liars Alike***; and
- 6.2 Defendants were also forced Defs. ***to issue this World’s First Legal Alert*** to warn this Court in ***future*** Court Hearings on ***Defendants’ substantive Response when duly filed to be even***

*more protective* than they will be in the **05.28.2020 Court Hearing** on this *procedural response for guaranteed Judicial Self-Protection from Lawyers and Liars Alike*.

WHEREFORE may it please Hon Court to please take judicial notice of the foregoing facts of the *publicly concealed lying industry* as the **100% TRUTH publicly revealed** for this Court to support its Summary Judgment and pass its legally valid and enforceable decision, order and/or judgment (“**Valid DOJ**”) as *Justice* required by laws *correctly applied* to end the *lying industry* used for *Miscarriage of Justice* aka *Justicide* by *rogues-in-robes* with absolute judicial immunity.

Dated: May 26, 2020

**Encs: Lis Pendens etc. 20 pages**

Respectfully Submitted by,

/s/Candice Michelle Bernstein

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### **CERTIFICATE OF SERVICE**

I CERTIFY that a copy of the foregoing has been furnished to parties listed on attached Service List by E-mail Electronic Transmission and/or Court ECF this May 26, 2020.

**/s/Candice Michelle**

**Bernstein**

**PRO SE**

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Case

Oppenheimer v BFR and Children Trusts

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