

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH  
COUNTY, FLORIDA  
CASE NO. 50-2014-CP-003698-XXXX-NB

IN RE SHIRLEY BERNSTEIN TRUST AGREEMENT DTD 05/20/08

**MOTION TO DISBURSE CERTAIN FUNDS**

Joshua Bernstein, by and through undersigned counsel, moves the Court to order an immediate disbursement of \$22,710 to be defrayed for purchase of a motor vehicle and for auto insurance,

Jacob Bernstein, by and through undersigned counsel, moves the Court to order an immediate disbursement of \$32,710 to be defrayed for purchase of a motor vehicle and for auto insurance,

Daniel Bernstein, by and through undersigned counsel, moves the Court to order an immediate disbursement of \$32,710 to be defrayed for purchase of a motor vehicle and for auto insurance

1. That Mediation was held on August 31, 2020. vehicles for Joshua (23yrs), Jacob (22yrs) and Daniel Bernstein (17yrs) could not be agreed upon with Ted Bernstein, their uncle and his counsel Alan Rose, Esq.

2. Joshua Bernstein petitioned the Court for funds for a car and received \$15,000 already, of which he used \$10,000 as a deposit on a Jeep and financed 19,000k. He has been paying insurance and financing with the remaining \$5,000. Joshua is seeking \$19,000 from the Court to pay off his vehicle and have no financing charges. Joshua needs his car to work and go to school.

3. Jacob Bernstein is petitioning the Court to buy his 1<sup>st</sup> vehicle a KIA Soul (the same make auto that Simon bought for Joshua on his 15<sup>th</sup> birthday) see attached exhibit A and is seeking \$29,110.

4. Daniel Bernstein is petitioning the Court to buy his 1<sup>st</sup> vehicle a KIA Soul , see attached exhibit A and is seeking \$29,110.

5. Each child is seeking an additional \$3,600/yr to purchase insurance for their

vehicles.

6. All three children go to different schools and jobs and need their cars to get to and from work and school.

7. This is an asset-based purchase and each will own the vehicle for the next 5-10 years.

8. Without vehicles the children are spending an outrageous amount in monthly UBER bills and is very costly in time lost at school and work.

Arthur J. Morburger  
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/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 22<sup>nd</sup> day of September, 2020.

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