IN THE CIRCUIT COURT OF THE I5TH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2018-CA-002317

WALTER E. SAHM and
PATRICIA SAHM,

Plaintiffs,

v.

BERNSTEIN FAMILY REALTY, LLC and
ALL UNKNOWN TENANTS.

Defendants

NOTICE OF ADDITIONAL EXHIBITS TO SUPPLEMENTAL 1.530 MOTION FOR REHEARING FILED BY INDISPENSABLE PARTIES JOSHUA, JACOB AND DANNY BERNSTEIN BY AND THROUGH UNDERSIGNED COUNSEL LESLIE ANN FERDERIGOS

PLEASE TAKE NOTICE that the following Exhibits are filed to the Supplemental motion under 1.530 Document No. 123 E Filed Feb. 17, 2022 for Rehearing and Vacating of the Final Judgment of Foreclosure and further Dismissing the action with prejudice:

1. E-Filed Exhibit 3 Filing # 67537706 E-Filed 02/05/2018 06:20:38 PM CASE NO. 50-2012-CP-004391-XXXX-NB filed as Objection by Joshua Bernstein in the Estate of Simon Bernstein by attorney Paul

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D. Turner of PERLMAN, BAJANDAS, YEVOLI & ALBRIGHT, P.L., 200 South Andrews Ave. Suite 600, Ft. Lauderdale, Florida 33301 to Settlement to Mediation Settlement Agreement with Tescher and Spallina by Ted Bernstein which shows:

A. Age of Joshua Bernstein with Date of Birth in August of 1997 thus turning the age of 18 and not a Minor by August of 2015 several years before any of the Complaints were filed in this action by counsel Sweetapple falsely and fraudulently alleging Joshua Bernstein as a "minor" in this action;

B. ***"At the time Diana Lewis was appointed Guardian ad litem for Joshua, he was neither a minor nor incapacitated. As a result, a guardian ad litem should not have been appointed for Joshua.;*** Between April 8, 2016, the date Lewis was appointed as guardian ad litem for Joshua and the date hereof, ***Lewis owed a fiduciary duty to Joshua. Notwithstanding said duty, Lewis has never communicated with him, discussed the legal proceedings or made him aware of the alleged settlement reached during the mediation. As of the date of the filing of this objection, Joshua is completely unaware of the terms of the proposed settlement and has***

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never been provided a copy of the mediation settlement agreement."

2. EMAIL FROM WALTER AND PAT SAHM JULY 2018 TO ELIOT BERNSTEIN **ADMITTING JOSHUA BERNSTEIN TO BE OF AGE** AND KNOWING HIS IDENTITY **NEARLY A YEAR BEFORE THE THIRD AMENDED COMPLAINT** FALSELY FILED BY COUNSEL SWEETAPPLE IN JUNE OF 2019; (**NOTE EMAIL ENDS SAYING**: "*Your dad told me twice that neither Pam nor Ted was to get one more dime because "they've already made millions off of Shirley and me."* Walt and Pat)

3. Operating Agreement of **BFR, LLC of June 2008 known to Walter and Pat Sahm at the time of Sale, Note and Mortgage which shows the Irrevocable Trusts of Joshua, Jake and Danny Bernstein as the Only Members and Owners of BFR,** LLC **all known by Plaintiffs years before the several complaints filed in this action by Counsel Sweetapple;** also includes Operating Agreements of Bernstein Family Investments, LLP. and Bernstein Holdings, LLC. ,.

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4. Signed and Fingerprinted July 2017 CEASE and DESIST Demand Letter by Joshua Bernstein to attorneys Diana Lewis, Alan Rose, Brian O'Connell and others showing his age of majority well before any Complaint filed by the Plaintiffs and Counsel Sweetapple.

5. DOCUMENT NO. 83 E FILED IN THIS ACTION OCT. 12, 2020 **OVER 2 YEARS BEFORE THE ALLEGED HEARING ON "SUMMARY JUDGMENT" NOV. 2022** filed by then Attorney Arthur Morburger on Motion to Vacate Default Judgment **showing this Court that indispensable parties Josh and Jake Bernstein were not minors at the time of Default, not minors at the time of Service, not minors at the time of the filing of the Amended Complaint and Service and jurisdiction thus void, a Motion that remained Unheard by this Court at the time of the Summary and Final Judgment which must now be vacated as void.**

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RESERVATION OF RIGHTS: The undersigned counsel Leslie Ann Ferderigos on behalf of indispensable parties Joshua, Jacob and Danny

Bernstein hereby reserves all rights to further Supplement these filings under Florida Rule 1.530 and further as law and justice may allow.

WHEREFORE, it is respectfully prayed for an immediate Order Vacating the Final and Summary Judgment in their entirety and Dismissing this action with prejudice and for such other and further relief as may be just and proper.

Dated: 3-4-2022

/s/Leslie Ferderigos

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CERTIFICATE OF SERVICE

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with the Clerk of Courts by using the E-PORTAL system to all parties of record in the pending case to include: ROBERT SWEETAPPLE, ESQ. bsweetapple@sweetapplelaw.com et al.

Dated: 3-4-2022

/s/Leslie Ferderigos

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