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

DEFENDANT'S VERIFIED MOTION FOR ORDER TO SHOW CAUSE WHY COUNSEL FOR THE PLAINTIFFS SHOULD NOT BE FOUND IN INDIRECT CRIMINAL CONTEMPT FOR NOT COMPLYING WITH ORDER FILED 1-14-22

COMES NOW, Defendants, JOSHUA ENNIO ZANDER BERNSTEIN, JACOB NOAH ARCHIE BERNSTEIN, and DANIEL ELIJSHA ABE OTTOMO BERNSTEIN, by and through their undersigned Attorney, pursuant to, files this Verified Motion for Order to Show Cause Why Counsel for the Plaintiffs Should Not Be Found in Indirect Criminal Contempt for Not Complying with Order Filed 1-14-22 as follows:

1. On (1-14-22), this Court ordered for the Plaintiff to respond in writing to the Defendant's Motion for Rehearing filed on (1-5-22).
2. On (1-21-22), the Plaintiff filed a Motion for Extension of time, requesting an additional (10) days to comply with said order. In the Plaintiff's request for extension of time, he claims to have attempted to reach out to Defendants

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to inquire if they would allow an extension of time. The Defendants have no record of any such attempt.

3. On (1-28-22), the Plaintiff filed a 2nd Motion for Extension of Time. Again the Plaintiff claims to have attempted to reach out to the Defendants. However, there is no such record of this attempt.
4. On (1-24-22), the Defendants filed a Notice of Appeal premised on the deceitful actions of the Plaintiff in getting the Final Judgment entered.
5. On (1-26-22), the 4th DCA, rendered an order of abeyance until the trial court disposes of the motion for rehearing and appellant files a copy of the order in this court.
6. The Plaintiff has intentionally delayed the progression of addressing the issue on the Motion for Rehearing before this Court.
7. For all of the above reasons, an order to show cause why the Plaintiffs should not be held in indirect criminal contempt should be entered for the above violation in accordance with the Florida Rules of Criminal Procedure. It is further requested that the above separate violations be heard in an expedited hearing.
8. The Defendants seek an award of attorney fees and costs as permitted by law.

WHEREFORE, Defendants, JOSHUA ENNIO ZANDER BERNSTEIN, JACOB NOAH ARCHIE BERNSTEIN, and DANIEL ELIJSHA ABE OTTOMO BERNSTEIN, files the above styled Motion for Order to Show Cause for Indirect Criminal Contempt and

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incorporated Affidavit, and respectfully requests the relief stated therein and any other the Court deems just and proper under the circumstances.

Under penalties of perjury, I declare that I have read this document and the facts stated in it are true

_____

JOSHUA ENNIO ZANDER BERNSTEIN,

_____

JACOB NOAH ARCHIE BERNSTEIN,

_____

DANIEL ELIJSHA ABE OTTOMO BERNSTEIN

CERTIFICATE OF SERVICE

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

2-7-22
Dated

/s/Leslie Ferderigos
Leslie Ferderigos, Esq.
Leslie Ann Law, PA
Bar No.:0127526
941 N. Orange Ave
Winter Park, Fl 32789
(t) 407-969-6116
leslie@leslieannlaw.com

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