

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

IN RE: ESTATE OF
SHIRLEY BERNSTEIN

Case No.: 502011CP000653XXXXSB
Division: IY

Deceased.

**ELIOT BERNSTEIN'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
THINGS PROPOUNDED ON THEODORE S. BERNSTEIN**

COMES NOW, **ELIOT BERNSTEIN**, pursuant to Florida Rule of Civil Procedure 1.350 and hereby requests **THEODORE S. BERNSTEIN** in his capacity as Personal Representative of the estate to produce the following at the offices of Huth & Pratt, 2101 NW Corporate Blvd., Suite 400, Boca Raton, Florida 33431 on or before the thirtieth (30th) day after service of this request:

DEFINITIONS

As used in this Request to Produce, "documents" and "tangible things" shall include, but is not limited to, writings of any kind; graphic, photographic or actual records or representations of any kind; electronic, mechanical, electrical or computer records or representations of any kind; including e-mail and other data compilations from which information can be obtained, translated, if necessary, by you through detection devices into a reasonably usable form; including original, reproductions, drafts, identical copies and non-identical copies, whether different from original by reason of notation made on the copy of otherwise.

As used in this Request to Produce, "persons" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations or other business or public organizations.

As used in this Request to Produce, “property” shall include real property, personal property, tangible property, intangible property, and property of any type or kind.

If any document called for by this Request for Production is withheld because you claim that information is contained in a document, tangible thing or communication protected by the attorney-client privilege, work product privilege, or other recognized privilege, you are requested to so state, specify for each such document, tangible thing or communication, its title, subject matter, sender, author, recipients of copies, each person to whom the original or any copy was circulated, the parties to the communication, the persons present during the communication, the purpose of the communication, the basis upon which the privilege is claimed, and the Request to Produce to which the document, tangible thing or communication is responsive.

As used in this Request to Produce, the term “Decedent” shall refer to **SHIRLEY BERNSTEIN**.

As used in this Request to Produce, the term “Estate” shall refer to **ESTATE OF SHIRLEY BERNSTEIN**.

As used in this Request to Produce, the term “Trust” shall refer to **TRUST OF SHIRLEY BERNSTEIN**.

REQUESTS FOR PRODUCTION

1. Please produce all documents and all physical evidence that evidence or relate to pieces of jewelry that that belonged to the Decedent at any point in time during the last two years of her death.
2. Please produce all documents and all physical evidence that evidence or relate any lock box, bank box, or safe deposit box that the Decedent owned (whether individually or jointly with any other person) during the last two years of her life. Please be sure to include any rental contracts, lease agreements, account opening forms, inventories, and logs associated with any such box.
3. Please produce all documents and all physical evidence that evidence or relate to any insurance policy that the Decedent had on any personal property that she owned during

the last two years of her life. Please be sure to include any personal property riders on any home owner's insurance policy.

4. Please produce all documents and all physical evidence that evidence or relate to any distributions or disbursements that were paid by or on behalf of the Estate, even if the distribution or disbursement was made by the Decedent's Trust on behalf of the Estate. Please be sure to produce documents related to any creditor's claims and any fees and costs that were paid.
5. Please produce any and all fee arrangements, fee agreements, retainer agreements, bills, account statements and settlement sheets that for any attorney who has been paid for rendering services to the Estate.
6. Please produce all separate writings or any other document in which the Decedent indicates where she wants her personal property to go upon her death.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished this 1st, day of November, 2013 via e-mail to Mark Manceri, Esq., via-email address: mrmlaw@comcast.net and to Robert Louis Spallina, Esq., via-email address: rspallina@tescherspallina.com.

Huth & Pratt

2101 N.W. Corporate Boulevard, Suite 400
Boca Raton, Florida 33431
Telephone: (561) 392-1800
Facsimile: (561) 392-3535

/s/ Brandan J. Pratt

Brandan J. Pratt, Esq.
Florida Bar No. 010745
Primary E-Mail: bpratt@huthpratt.com
Secondary E-mail: liza@huthpratt.com