

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

IN RE: THE ESTATE OF
SIMON LEON BERNSTEIN,
Deceased

CASE NO. 502012CP004391XXXXSB

HON. JUDGE MARTIN H. COLIN

ELIOT IVAN BERNSTEIN, PRO SE
PETITIONER AND
CANDICE MICHELLE BERNSTEIN, PRO SE

V.

TESCHER & SPALLINA, P.A., (AND ALL PARTNERS,
ASSOCIATES AND OF COUNSEL);
ROBERT L. SPALLINA, ESQ., PERSONALLY;
ROBERT L. SPALLINA, ESQ., PROFESSIONALLY;
DONALD R. TESCHER, ESQ., PERSONALLY;
DONALD R. TESCHER, ESQ., PROFESSIONALLY;
THEODORE STUART BERNSTEIN, INDIVIDUALLY;
THEODORE STUART BERNSTEIN, AS ALLEGED PERSONAL
REPRESENTATIVE;
THEODORE STUART BERNSTEIN, AS ALLEGED TRUSTEE
AND SUCCESSOR TRUSTEE PERSONALLY;
THEODORE STUART BERNSTEIN, AS ALLEGED TRUSTEE
AND SUCCESSOR TRUSTEE, PROFESSIONALLY;
THEODORE STUART BERNSTEIN, AS TRUSTEE FOR HIS
CHILDREN;
LISA SUE FRIEDSTEIN, INDIVIDUALLY AS A BENEFICIARY;
LISA SUE FRIEDSTEIN, AS TRUSTEE FOR HER CHILDREN;
JILL MARLA IANTONI, INDIVIDUALLY AS A BENEFICIARY;
JILL MARLA IANTONI, AS TRUSTEE FOR HER CHILDREN;
PAMELA BETH SIMON, INDIVIDUALLY;
PAMELA BETH SIMON, AS TRUSTEE FOR HER CHILDREN;
MARK MANCERI, ESQ., PERSONALLY;
MARK MANCERI, ESQ., PROFESSIONALLY;
MARK R. MANCERI, P.A. (AND ALL PARTNERS,
ASSOCIATES AND OF COUNSEL);
JOSHUA ENNIO ZANDER BERNSTEIN (ELIOT
MINOR CHILD);
JACOB NOAH ARCHIE BERNSTEIN (ELIOT
MINOR CHILD);
DANIEL ELIJSHA ABE OTTOMO BERNSTEIN
(ELIOT MINOR CHILD);
ALEXANDRA BERNSTEIN (TED ADULT CHILD);

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ERIC BERNSTEIN (TED ADULT CHILD);
MICHAEL BERNSTEIN (TED ADULT CHILD);
MATTHEW LOGAN (TED'S SPOUSE ADULT
CHILD);
MOLLY NORAH SIMON (PAMELA ADULT
CHILD);
JULIA IANTONI – JILL MINOR CHILD;
MAX FRIEDSTEIN – LISA MINOR CHILD;
CARLY FRIEDSTEIN – LISA MINOR CHILD;
PAGE, MRACHEK, FITZGERALD & ROSE, P.A.
(AND ALL PARTNERS, ASSOCIATES AND OF
COUNSEL);
ALAN B. ROSE, ESQ. – PERSONALLY;
ALAN B. ROSE, ESQ. – PROFESSIONALLY;
PANKAUSKI LAW FIRM PLLC, (AND ALL
PARTNERS, ASSOCIATES AND OF COUNSEL);
JOHN J. PANKAUSKI, ESQ. – PERSONALLY;
JOHN J. PANKAUSKI, ESQ. – PROFESSIONALLY;
KIMBERLY FRANCIS MORAN – PERSONALLY;
KIMBERLY FRANCIS MORAN –
PROFESSIONALLY;
LINDSAY BAXLEY AKA LINDSAY GILES –
PERSONALLY;
LINDSAY BAXLEY AKA LINDSAY GILES –
PROFESSIONALLY;
THE ALLEGED “SIMON L. BERNSTEIN AMENDED
AND RESTATED TRUST AGREEMENT” DATED
JULY 25, 2012;
JOHN AND JANE DOE’S (1-5000).

**RESPONSE TO PRODUCTION REQUEST AND REQUEST FOR
PROTECTIVE ORDER**

COMES NOW, Eliot Ivan Bernstein (“Eliot”) and Candice Michelle Bernstein (“Candice”), both PRO SE, Eliot as Beneficiary and Interested Party both for himself personally and with Candice as Guardians for their three minor children (who may also be Beneficiaries and Interested Parties of the Estates and Trusts of Simon Bernstein (“Simon”) and Shirley Bernstein (“Shirley”)), and hereby files this “RESPONSE TO PRODUCTION AND

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REQUEST FOR PROTECTIVE ORDER” and in support thereof states, as follows:

OBJECTIONS TO PRODUCTION

RESPONSE TO PRODUCTION REQUEST BACKGROUND

1. That the Production Request filed on **December 13, 2013** in this Court was for the Estate of Shirley and not Simon’s Estate as Alan Rose, Esq. (“Alan”) misinformed the Court in recent hearings and was filed by former removed counsel Donald Tescher, Esq. (“Tescher”), Robert Spallina, Esq. (“Spallina”) and Mark Manceri, Esq. (“Manceri”) in efforts to harass Eliot as part of an Abusive Legal Strategy to gain highly sensitive data regarding criminal complaints and more filed by Eliot, once they knew that they were being investigated by Palm Beach County Sheriff Office and others.
2. That the materials requested in the production order in **Shirley’s Estate** were to be sent to Mark Manceri, Esq. who resigned as Sheriff Investigators began their investigation of the Forgeries and Fraud in the Estates of Simon and Shirley and his involvement and the pleading has been abandoned since that time.
3. That most of the Production requested has nothing to do with the Estates and Trusts of Simon and Shirley or the upcoming hearing in SIMON’S ESTATE to Remove Theodore Bernstein and are part of a fishing expedition and further part of an alleged conspiracy between Theodore Stuart Bernstein (“Theodore”) or (“Ted”) and Alan Rose, Esq. (“Alan”) to harass Eliot and use “FORCE” and “AGGRESSIVE” tactics against Eliot, including an abusive legal strategy that was all exposed in an email that Theodore sent to Eliot describing such conspiratorial activity that Alan is now attempting to claim Attorney/Client privilege over to suppress the damning and incriminating letter against he and his client, when the letter is in no way Privileged and when

exposed to this Court will prove more legal abuse and fraud caused by Theodore and Alan with intent as described in the letter.

4. That this request for Discovery through Production is for Alan and Theodore, two of the people who were centrally involved in the artifices to defraud already proven and admitted in these matters, in efforts to gain highly sensitive and confidential information regarding Eliot's Intellectual Properties, the Ivievit companies RICO and ANTITRUST lawsuit and the ongoing criminal complaints in these matters against them and gain this information to use to harm Eliot through FORCE and AGRESSION as stated in the ALLEGED privileged letter.
5. That if the Court determines that this information is relevant in any way to the July 11, 2014 Hearing to Remove Theodore as ALLEGED Successor Trustee, which hearing is intended to remove both Theodore and his counsel Alan altogether from the Estates and Trusts of Simon and Shirley, which would then make this production moot, exactly what materials they would be looking for and the relevancy will be required for Eliot to produce any documents, as much of this information is already given to Federal and State authorities and much of the information sought includes information regarding Theodore and Alan's involvement in those alleged crimes they are being investigated for currently.
6. That Theodore is NOT QUALIFIED to act as Trustee of the Simon Trusts and file these pleadings or request anything and the pleading for production for the upcoming hearing in Simon's Estate was somehow now inserted into the Simon Estate by Alan despite it being filed in Shirley's Estate case and never was refiled in Simon's Estate by new alleged counsel, Alan.
7. Ted Bernstein Should Be Removed as Trustee of the Revocable Trust.
8. Ted Bernstein is Not Eligible to Serve as Trustee under the very terms of the Revocable Trust.

9. The previous co-trustees of the Revocable Trust were Tescher and Spallina by virtue of the Successor Trustee provision set forth in Article IV, Section C of the Revocable Trust. By letter dated January 14, 2014 addressed to the five children of Simon Bernstein, Donald Tescher for himself and on behalf of Robert Spallina, resigned as co-trustees of the Revocable Trust (and the Shirley Bernstein Trust) after admitting that their firm had ALTERED TRUST DOCUMENTS POST MORTEM ILLEGALLY TO BENEFIT THEODORE AND OTHERS and stated, "If the majority of the Bernstein family is in agreement, I would propose to exercise the power to designate a successor trustee by appointing Ted Bernstein in that capacity."
10. Whether Ted Bernstein was actually appointed trustee is not clear. The Revocable Trust, at Article IV, Section C(3), specifically states, "The appointment [of the successor trustee] will be by a written document executed by such person in the presence of two witnesses and acknowledged before a notary public delivered to the appointed Trustee ... "
11. Whether such document was ever executed with respect to Ted's appointment is not known to but from his and Alan's pleadings to this Court it is assumed that Ted Bernstein has assumed the role of successor trustee, either de facto or de Jure, based on the exercise of the power by the previous trustee and either way, having the ALLEGED dispositive document (as the 2012 Amended and Restated Trust is challenged already by Eliot for evidence of further fraud and more as already pled to this Court) both Alan and Theodore know that in the very language of the Trust Theodore would NOT BE QUALIFIED TO SERVE and thus Alan would not be able to serve as his counsel and thus they would not be able to make pleadings, production requests and deposition requests of Eliot and would only be Respondents forward as are their partners in the crimes, Tescher, Spallina and Manceri.



12. That despite knowing that Theodore CANNOT be successor trustee, the threatening letter to Eliot that has been erroneously claimed as Privileged states that Theodore's counsel, John Pankauski, Esq. did not believe Theodore was the Trustee and was misusing Trust funds in so acting. Theodore's email to Eliot that contained a letter to Alan described how Theodore did not care what counsel said and that he wanted a strategy of legal abuse and "FORCE" and "AGGRESSIVE" act not only against Eliot but against others who may have sensitive information regarding investigations involving Alan and Theodore as suspects.
13. If Ted Bernstein has succeeded as trustee of the Revocable Trust, he should be IMMEDIATELY removed on this Court's own motion, as he was ineligible under the terms of the Revocable Trust to serve as successor trustee ever. Article IV, Section C(3) of the Revocable Trust states: A successor Trustee appointed under this subparagraph shall not be a Related or Subordinate Party of the trust.
14. The Revocable Trust, under Article II, Subsection E(7) defines a "Related or Subordinate Party" as follows: A "Related or Subordinate Party" to a trust describes a beneficiary of the subject trust or a related or subordinate party to a beneficiary of the trust as the terms "related or subordinate party" are defined under Code Section 672(c). Under Subsection E(2), "Code" is defined as "the Internal Revenue Code of 1986 ... " A "Related or subordinate party" under the Code means any nonadverse party who is " ... (2) any one of the following: The Grantor's father, mother, issue brother or sister; ..."
15. Theodore Bernstein is the son, or an "issue" of the Grantor, Simon Bernstein, and a related party to the beneficiary, Theodore's son, Simon's grandson. Therefore, Theodore Bernstein is ineligible as a Related or Subordinate Party to serve as a successor trustee.

16. That Tescher who drafted the ALLEGED dispositive document therefore acted against the language of the ALLEGED document that he himself drafted and thus knew beyond a reasonable doubt that Theodore was INELLIGIBLE under the terms but in what appears a last ditch effort to continue the FRAUD and further the COVER UP and CONTAIN INVESTIGATION INTO THE PAST FRAUDS, he ALLEGEDLY appointed Theodore, his business partner and close personal bedfellow in hopes that Theodore could stymie and interfere with investigation of he and Spallina et al. All of these fraudulent schemes and artifices to defraud where in part to directly benefit Theodore who was DISINHERITED in any beneficiary designations ultimately decided by this Court in both Simon and Shirley's Estates and Trusts and his children now may or may not be beneficiaries depending on if the ALLEGED 2012 Dispositive documents stand.
17. That recently disclosed to this Court in prior pleadings, the Governor Rick Scott's Office Notary Public Division has already confirmed that 2012 Will Simon and the 2012 Amended & Restated Trust of Simon have been improperly notarized by Baxley, Theodore's personal assistant, who has been reprimanded at this time, yet due to the improper notarizations it cannot be stated that Simon was present at the signing of the documents, as the Notary failed to state or demark such. That if those documents fail, Eliot and NOT THEODORE would be a one third beneficiary of the Estates and Trusts of both Simon and Shirley with two of his three sisters, as Pamela Simon, Theodore's sister was also DISINHERITED from both the Estates and Trusts of Simon and Shirley and no grandchildren would inherit anything. That the 2008 Trusts and Estates documents of both Simon and Shirley, done together while alive and with no help POST MORTEM through forgery and fraud, consider Theodore and Pamela and their lineal descendants as predeceased and despite Simon having once considered a change to the grandchildren it appears that these changes were never legally made by Simon, as on information

and belief, immediately prior to his death, he wanted no changes made to the 2008 documents. Evidence shows that without the fraudulent activities to makeup the 2012 documents, the 2008 documents will stand and only three of five of Simon and Shirley's children are beneficiaries. That knowing of their families exclusion prior to Simon dying, tipped off by Spallina, Theodore and Pamela were enraged and worked together and separately in conspiracy with others to attempt to coerce Simon to make changes up until the day he died and when he died they drafted POST MORTEM estate plans for Simon and Shirley and tried to change the beneficiaries to gain almost 50% of the estate through these scheme's and artifices to defraud. This anger and hostility and the threats of force and aggression CANNOT be the qualities this Court approves of for alleged fiduciaries and counsel of the Estates and Trusts.

18. That Theodore is also not qualified to act in any Fiduciary capacities in either the Estates or Trusts of Simon and Shirley for the following additional reasons, including but not limited to,
 - i. Theodore in violation of probate rules and statutes has failed to send any accountings to any Beneficiaries of Interested Parties and failed to notify Beneficiaries and Interested Parties of his alleged fiduciary capacities as legally required when he claims to have assumed these fiduciary roles, including failing to send ANY dispositive documents to ANY BENEFICIARIES OR INTERESTED PARTIES, in order to conceal his frauds.
 - ii. Theodore has failed in his alleged fiduciary capacities and is not qualified to act in any fiduciary capacity in either the Estates or Trusts of Simon and Shirley since;
 - a. October 11, 2013 when this Court stated it would appointed him Personal Representative of Shirley's Estate when he completed following the probate rules and statutes and it is unclear if this Court ever issued letters, (in error, as he was unfit to serve then for several qualified legal reasons and should have so resigned)

and still fails to have any contact with beneficiaries or disclosure almost a year later, as legally required,

- b. September 13, 2012 when he alleges to have become the Successor Trustee of the Shirley Trust and has since failed and continues to fail to notify the beneficiaries of anything or sent any accountings for NEARLY TWO YEARS, as legally required,
- c. January 2014 when Theodore alleges that Tescher made him successor trustee of the ALLEGED 2012 Simon Amended and Restated Trust and has since failed to and continues to fail to notify the beneficiaries or sent accounting for over six months, as legally required,
- d. January 2014 when Theodore stated to the West Palm Beach Sheriff department that he never read the trust document he was operating under and only relied on the advice of counsel and where there is contradictory evidence that Theodore claimed he did read the documents carefully before opening accounts with JP Morgan and other evidence to the contrary prior to his statements to the Sheriff Detectives,
- e. Theodore has not graduated college,
- f. Theodore has declared Bankruptcy in the past,
- g. Theodore is declaring the companies of he and Simon worthless now and has failed to provide any accounting of the companies to the Estates and Trusts of Simon and the beneficiaries who hold interests in the businesses, as required by law to prove such claim,



- h. January 2014 when Theodore's counsel Spallina stated to West Palm Beach Sheriff Detectives that Theodore acted against the advice counsel in taking distributions that Spallina and Tescher helped do knowing the beneficiaries were improper as Spallina even admitted ALTERING TRUST DOCUMENTS to achieve these ends and convince others of the improper beneficiaries,
- i. May of 2013 when Theodore was informed by Eliot via service of his initial pleading in this case of Fraudulently Notarized and Forged Documents in his own name, his deceased father's name and four others and yet he took no actions to notify authorities as legally required. In fact, Theodore, Spallina, Tescher, Manceri, Alan, Pankauski et al. moved faster to distribute assets illegally knowing the beneficiaries were improper and acted in self-dealing transactions, to benefit Theodore and harm other Beneficiaries, Interested Parties and Creditors, using these Fiduciary Roles he had not been granted and are based on fraudulent documents, which are factually known by this Court to be part of a Fraud on this Court and others, as it was learned in the September 13, 2013 hearing that Simon had died in September 2012 and yet still acted as if alive as the PR of Shirley for several months until January 2013, filing a stream of documents (POST MORTEM) and even closed the Estate of Shirley with this Court while dead, due to these FRAUDULENT ACTS IN AND UPON THIS COURT BY OFFICERS AND FIDUCIARIES OF THIS COURT. Therefore since the Estate was fraudulently closed by a dead person, no successor was therefore ever elected until this Court reopened the Estate and allegedly appointed Theodore, long after



he had already begun acting as Personal Representative and taken over other fiduciary roles illegally,

- j. Due to the Admitted Altering of Shirley's Trust documents by Spallina that directly benefited Theodore's family and now with such admission dissolving his and his immediate family's rights to benefits, Theodore is in direct conflict and adverse to the other beneficiaries and cannot be unbiased in any fiduciary capacities,
- k. Theodore is under ongoing investigations for his conspiratorial role with Tescher and Spallina in a variety of frauds committed after seizing Dominion and Control of the Estate with Tescher and Spallina through combinations of Fraudulently Notarized Documents, Forged Documents (including Post Mortem Forgeries), Fraudulently Altered Trust Documents, including but not limited to,
 1. Theft of Estate assets of between 40-100 million dollars,
 2. Jewelry Theft,
 3. Insurance Fraud,
 4. Bank Fraud,
 5. Extortion of Eliot, Candice and their three minor children as pled to this Court in yet unheard motions,
 6. In Palm Beach Country 15th Judicial Case No. 502012CA013933 in re William Stansbury v. Ted Bernstein et al. Ted is charged with, Count I – Accounting, Count II - Breach of Oral Contract, Count III - Breach of Fiduciary Duty, Count IV- Civil Theft, Count V – Conversion, Count VI – Fraud in the Inducement, etc.,

7. The "Schiller" Lawsuit – Theodore is a Defendant in yet another lawsuit filed in this Circuit Court. See. Schiller v. Life Insurance Concepts, et al, Case No. 502013CA007442 AD, wherein Theodore and others are accused of negligence and other business torts in connection with their business dealings again from actions primarily by Theodore against another close personal friend of Simon's, as with Stansbury (in fact, in the 2008 Trust of Simon recently unearthed that had been intentionally denied and suppressed by Tescher and Spallina until 2014, we find that Simon elected Creditor Stansbury and Trustee and PR for the Estates and Trusts),

8. Fraud on a Federal Court,

- l. Theodore has filed a Federal Complaint for life insurance proceeds of an insurance policy that Simon was the owner of, when Theodore himself has claimed that there is no executed or copy of the executed trust that he claims LOST. That weeks prior to Theodore's claim of said LOST trust, Spallina had made a FRAUDULENT INSURANCE CLAIM, stating he was the Trustee of the LOST trust that he claims never to have seen,
- m. Theodore has advised his counsel to use FORCE and AGGRESSIVE tactics against Eliot and others,
- n. Theodore has been advised by Counsel that they did not think he should be Trustee and use Trust assets to protect himself from the claims against him and suggested to Alan to fire counsel that did not agree with him,



o. Theodore individually and as a corporate executive is sued and is the main defendant in the Stansbury Creditor action and this causes direct conflict and adverse interests in his acting as an ALLEGED fiduciary of the Estates and Trusts of both Simon and Shirley that have all been sued as well by Stansbury but allegedly due to Theodore, not Simon's alleged violations of law against Stansbury. Theodore thus has self-interests in seeing damages paid by the Estates and Trusts where he has NO BENEFICIAL INTERESTS WHATSOEVER and was DISINHERITED versus paying the damages or settlement himself from his personal funds and thus his negotiating on behalf of the Estates and Trusts as a fiduciary in this litigation and is prohibited from being a fiduciary since he has adverse interests and conflicts directly with the Stansbury matters.

1. See Stansbury's "JOINDER IN PETITION FILED BY ELIOT IVAN BERNSTEIN FOR REMOVAL OF TRUSTEE AND FOR TRUST ACCOUNTING" @

<http://www.iviewit.tv/Simon%20and%20Shirley%20Estate/20140522StansburyJoinder1.pdf>

2. See Stansbury's "RESPONSE IN OPPOSITION TO THE APPOINTMENT OF TED BERNSTEIN AS SUCCESSOR PERSONAL REPRESENTATIVE AND MOTION FOR THE APPOINTMENT OF AN INDEPENDENT THIRD PARTY AS BOTH SUCCESSOR PERSONAL REPRESENTATIVE AND TRUSTEE OF THE SIMON BERNSTEIN TRUST AGREEMENT" @

<http://www.iviewit.tv/Simon%20and%20Shirley%20Estate/20140627ResponseInOppositionToApptOfTedBernsteinFiledbyFeamanStansbury.pdf>

19. That despite his conflicts with the Stansbury matters, it has recently been learned that Theodore and Alan are negotiating settlements with Stansbury and acting in conflict, as Alan is settling for Theodore individually while negotiating as his personal counsel and then on negotiating with himself on behalf of Theodore as ALLGED PR and TRUSTEE in the Estates and Trusts and attempting to use Estate and Trust funds to settle the matters for which Theodore is the primary the accused party of the bad acts and benefits greatly if Estate and Trust assets that he is DISINHERITED from are used and not his personal monies.
20. That Alan, who is fully aware of the language of the ALLEGED 2012 Amended and Restated Trust document that PROHIBITS Theodore from being a successor trustee and is aware of all the other reasons listed above that PROHIBIT THEODORE from acting as a fiduciary at all in these matters has been advising his client inappropriately to act in these fiduciary capacities that he cannot now have or ever had and thereby continuing this PATTERN AND PRACTICE OF FRAUD ON THIS COURT, FRAUD ON THE BENEFICIARIES, CREDITOR FRAUD, etc.
21. That again, all these proven, admitted and alleged criminal acts were COMMITTED in part by the former removed Counsel and Fiduciaries, Tescher and Spallina et al. who Alan was retained and engaged by, Tescher and Spallina. All these parties were brought into the fold by Theodore as they are his close personal business associates, partners in some cases and bedfellows and all these parties were working together in conspiratorial efforts to effectuate the PRIOR FRAUDS. Theodore and Alan are the last ones left standing who are desperately trying to hold on in the Estates and Trusts to further stymie and delay prosecution for their friends and themselves through further and continuing fraud on the Court and others. Alan, due to his involvement in

the advancement of the prior frauds also has direct interests in the outcome of this lawsuit that now pervert his ability to be unbiased and to represent his client and the beneficiaries of the Estates and Trusts without bias, exhibited by his failure to notify this Court and others of his client's fiduciary violations already noted herein and instead continuing to aid and abet this criminal misconduct and Fraud on this Court, as now his own life depends on his continuing the Fraud and Cover Up to stay out of jail and more.

22. That Alan and Theodore should be removed instantly by this Court, **NO DISCOVERY OF ANY PARTY SHOULD BE ALLOWED BY THEM BY THIS COURT** and all pleadings or other entries to the record that they have made **REMOVED** and **STRICKEN** and they should be reported to the proper authorities by this Court as legally required by Judicial Canon's and Law, especially where **BOTH** are **OFFICERS OF THIS COURT** and are knowingly acting improperly to disrupt these proceedings illegally and attempt to contain and cover up the fraud of their friends and themselves.

LINE BY LINE OBJECTIONS

Paragraph I. – A-M

23. That the only relevancy to the Estates and Trusts of Simon and Shirley of the Iviewit companies, is Simon and Shirley's 30% interest in the companies and intellectual properties of the Iviewit companies, which strangely all information regarding Simon's interests is missing from the production documents turned over by Tescher and Spallina to the Curator by this Court's order on their removal, other than those already provided by Eliot to Tescher and Spallina. In fact, Tescher and Spallina claimed at first to know nothing about the Iviewit Companies where Simon and Shirley's interests could be worth billions.

24. That Eliot has already turned documents over to the Personal Representatives regarding his information regarding Simon and Shirley's interests in the Iviewit Companies prepared by Proskauer Rose law firm and Goldstein Lewin/CBIZ accounting firm. If Alan and Theodore are looking for financial information or documents relating to Simon's interests they should turn to Proskauer Rose and Lewin, who did all the documents and formed the companies and issued the shares to Simon and Shirley and retained those records.
25. That Eliot's information on the ongoing Iviewit matters has nothing to do with the Estates and Trusts of Simon and Shirley and as evidenced in the email from Theodore to Eliot that is erroneously claimed as Privileged, Theodore states he wants Alan to try to get information regarding highly sensitive data regarding ongoing investigations and legal actions where Theodore is a suspect and has been reported for his involvement in those actions. This request is therefore part of intel gathering for Theodore to find out who is investigating him and has nothing to do with the Estates and Trusts of Simon and Shirley.

Paragraph II. ENTITY DOCUMENTS TO BE PRODUCED

26. That all documents requested in this section can also be obtained from both Proskauer Rose and Goldstein Lewin/CBIZ and Eliot has been requesting these for many years from them. Perhaps this Court can order these documents requested from these two firms who prepared all the corporate documents, maintained and distributed shares and failed to turn the documents over to investors in the companies.
27. That all tax returns, bank records, shareholder information was prepared and maintained by Proskauer Rose and Goldstein Lewin/CBIZ and again the production request should be made on them.

Paragraph III. INDIVIDUAL DOCUMENTS TO BE PRODUCED

28. That Eliot objects to turning over his personal tax records as they are wholly irrelevant to the matters in the Estates and Trusts of Simon and Shirley and nothing to do with the upcoming hearing on July 11th 2014 in the Estate of Simon for removal of Theodore and Alan and more.
29. Eliot's resume can be found at www.iviewit.tv under the Inventor Section and Eliot refuses to give any further information regarding his current employment to Alan and Theodore, who when the privileged document is finally heard by this Court, will show that they intend on gaining that information for purposes of harming and interfering with Eliot's employment and employers or ANYBODY helping Eliot to prosecute them or in any way helping Eliot.
30. That Eliot objects to turning over any personal financial information to Theodore and Alan, as again it has nothing to do with the Estates and Trusts of Simon or Shirley and is only part of their legal abuse strategy to harass Eliot and others helping Eliot.
31. That Eliot object to turning over any information regarding his conversations with William Stansbury as they relate to strategies which involve the prosecution of Theodore and Alan and others for the criminal acts that both Theodore and Alan were directly involved in with the former removed Personal Representatives/Co-Trustees/Counsel to Co-Trustees and PR's, Tescher and Spallina and are materials relating to ongoing investigations against both Theodore and Alan for their part directly in advancing the Creditor Fraud of Tescher and Spallina et al. against Stansbury. That at the time the production request was made by Manceri in December 2013, they did not know that Eliot and Stansbury were working together so this was part of that fishing expedition and has no bearing on the upcoming hearings.

Instructions

32. That even if this Court were to demand these documents for Iviewit requested in the Production list it would take Eliot several years to locate the mass of documents requested that DO NOT

pertain to the Estates of Simon and Shirley, as they have been scattered around the country, as Eliot and his family were first forced to flee their home for death threats that were levied against them when it was discovered that Attorneys from Proskauer Rose, Foley and Lardner and accountants from Goldstein Lewin/CBIZ were involved in attempted thefts of the Intellectual Properties and more. Then Eliot and Candice returned to fight them in Florida from California in this Court and were again forced to flee their home overnight in FL when a bomb went off inside their vehicle. Then Eliot and Candice moved throughout California for several years before returning to Florida when Eliot's parents became increasingly ill and so many of these documents have been scattered from coast to coast. The easiest way to get the bulk of documents requested, if allowed by this Court, would be a production request to the firms who maintained the records for the companies and Eliot's personal returns, Proskauer and Goldstein Lewin/CBIZ. That Theodore can also get most of the public information regarding Iviewit from www.iviewit.tv homepage where thousands of pages of documents are listed and downloadable regarding Iviewit.

33. That for all these reasons stated herein, including but not limited to,
- i. this Production request was filed by Manceri who withdrew in the Estate of Shirley and filed this request in the Estate of Shirley, which was not what Alan stated to the Court, as he claimed this production request was necessary for the upcoming hearings in the Estate of Simon,
 - ii. the fact that the ALLEGED dispositive document that both Alan and Theodore are acting under PROHIBITS Theodore from being a Successor Trustee and thus PROHIBITS him from hiring Alan to represent him in this felonious capacity,

- iii. the fact that the ALLEGED privileged letter contains THREATS to the safety of Eliot and others from FORCE and AGRESSION that may lead to bodily harm and relies on a LEGAL ABUSE STRATEGY to achieve these ends and seek out those who can harm them through this FRAUD ON THE COURT,

Eliot prays this Court deny any further production or any discovery requests by Theodore or Alan TO ANY PARTY until it is determined if they are representing with legally obtained legal standing and are acting in good faith to benefit the beneficiaries they are alleging to represent and for the benefit of the Estates and Trusts of Simon and Shirley or if they acting for self-preservation reasons and to cover up their past crimes and further harm Eliot.

MOTION FOR PROTECTIVE ORDER

34. That the discovery and production request is for information dating back to 2004 and again this appears more a fishing expedition and harassment in efforts to gain information into Eliot's legal actions against Theodore and his close personal friends at Proskauer Rose and his close personal friend Gerald Lewin of Goldstein Lewin/CBIZ and not to prepare for matters related to the Estates and Trusts of Simon and Shirley and the upcoming hearings.
35. That Eliot states that ALL Eliot's information is confidential and should not be turned over to Theodore and Alan, as they are both Respondents in these matters, acting illegally in capacities that they cannot act under and where Alan as a Respondent in the Estates and Trusts actions before this Court in the Simon and Shirley Estates is now conflicted and he is adverse to parties in these matters, due to his direct involvement in aiding and abetting the criminal frauds already proven, admitted and alleged against Tescher and Spallina et al., who Alan was brought in by and worked directly with in advancing the artifices to defraud.



36. That where these conflicts have biased his representation of his client and his representations to this Court, as he fears if Eliot is further successful in prosecuting Theodore, Spallina, Tescher, Manceri et al., he too may face criminal charges, a possible prison sentence and loss of his personal assets. Alan's conflicts, his direct personal involvement in the frauds and his adverse interests appear the driving motive of this sudden need to harass Eliot through ridiculously broad and irrelevant discovery and production that appears only as a mechanism to gain information to who Eliot is working with in his lawsuits, state and federal criminal complaints and more against Alan and others.
37. That this Court prior to compelling Eliot to produce any documents to Alan or Theodore must first determine if Alan can legally act or could ever legally act as counsel in these matters and file requests for production or conduct depositions in the first place, especially where he and his firm are named Respondents for good and just cause due to their direct involvement with Tescher and Spallina and the artifices to defraud already proven and admitted and those alleged in these matters. Where Alan is directly involved in the attempts to have distributions made to improper parties, including his client Theodore and even after knowing these distributions were claimed improper by other counsel Alan has failed to report his clients egregious acts of bad faith with unclean hands.
38. That this Court must determine if Alan can continue to act in any legal capacities other than Pro Se for himself individually and professionally or have to retain counsel for each capacity he is sued in and withdraw as counsel.
39. That Alan's direct conflicts with the criminal matters in the Estates and Trusts have caused him to become Adverse to both his client, Eliot, the Creditor and others and it appears his legal strategies are of an abusive and harassing nature to try and smear and defame Eliot who is now

the bane of his existence, especially as Eliot is spearheading the investigations with authorities into his involvement in the criminal acts. These direct personal and professional conflicts with the matters in the Estates and Trusts of Simon and Shirley and now the fact that he is a named Respondent in these matters both personally and professionally make his continued practice before this Court in these matters prohibited.

40. That the language of the ALLEGED 2012 Amended & Restated Trust that has been challenged in Eliot's prior pleadings for further evidence of fraud and cited already herein, also precludes Theodore from becoming a successor trustee and thus this Court must put the proverbial horse before the cart and FIRST address the issue if Alan or his client Theodore even have rights to be acting in any legal or fiduciary capacities before the Court or if this whole shenanigans is a further fraud and a waste of time and money (with intent) designed to gain information to harm Eliot before they are kicked out of here by this Court and reported as legally required by Your Honor to the proper authorities for further Fraud on this Court, Fraud on the Beneficiaries and more.

41. As reiterated in *Baker v. Myers Tractor Services, Inc.*, 765 So. 2d 149, (Fla. 1st DCA 2000):
When the central issues of a case are based in fraud, the courts cannot move forward as a matter of law. The fraud issue must first be cleared up. Alan and Theodore are connected to fraud in this case and must be removed from this proceeding instantly and sanctioned and reported to the proper authorities .. See *Cox v. Burke*, 706 So. 2d 43, 47 (Fla. 5th DCA 1998).

42. If this court does not dismiss based on fraud and continues to allow Alan Rose to act as an Officer of this Court and rule upon his frivolous and vexatious filings then Eliot alleges this is an abuse of discretion. See *Rosenthal v. Rodriguez*, 750 So. 2d 703 (Fla. 3d DCA 2000). The integrity of the civil litigation process depends on truthful disclosure of facts. A system that

depends on an adversary's ability to uncover falsehoods is doomed to failure, which is why this kind of conduct must be discouraged in the strongest possible way. As set forth in Rosenthal v. Rodriguez, 750 So. 2d 703, 704 (Fla. 3d DCA 2000): Courts throughout this state have repeatedly held "that a party who has been guilty of fraud or misconduct in the prosecution or defense of a civil proceeding should not be permitted to continue to employ the very institution it has subverted to achieve their ends." Metropolitan Dade County v. Martinsen, 736 So. 2d 794, 795 (Fla. 3d DCA 1999) (quoting Hanono v. Murphy, 723 So. 2d 892, 895 (Fla. 3d DCA 1998)); see also Cox v. Burke, 706 So. 2d 43, 47 (Fla. 5th DCA 1998); O'Vahey v. Miller, 644 So. 2d 550, 551 (Fla. 3d DCA 1994); Kornblum v. Schneider, 609 So. 2d 138, 139 (Fla. 4th DCA 1992).

43. That Eliot requests the Court prior to compelling discovery and/or production from Eliot of ANYTHING to Alan and Theodore, FIRST also look at the ALLEGED Attorney/Client Privileged letter Alan is trying to claim privilege on, as it is now online at <http://www.ripoffreport.com/r/alan-rose-of-mrachek-fitzgerald-rose/west-palm-beach-florida-33401/alan-rose-of-mrachek-fitzgerald-amp-rose-alan-b-rose-suppress-free-speech-cover-up-1149197> where Theodore who sent an email directly to Eliot and where neither is an attorney or client of the other, describes his legal strategy to Eliot in a letter he wrote to Alan that is not marked in anyway as Attorney/Client Privileged and no attorneys were copied on the email, which claims that the strategy is to harass and be FORCEFUL with Eliot, quotes from that website include,

"If John [Respondent John Pankauski, Esq. Theodore's other lawyer in these matters] does not want to tangle with Eliot, remove John immediately. I am sorry to be this blunt, but I do not want to address the John issue again. **If he is not 100% in support of me as trustee, including how I have protected myself with trust assets [emphasis added]** and will continue doing so as necessary, and being **aggressive**

and forceful [emphasis added], if need be, with eliot, remove him as counsel.”

The Definition of “Forceful”:
Dictionary Dot Com Definition of Forceful @
<http://dictionary.reference.com/browse/forceful>

"force·ful [fawrs-fuhl, fohrs-] adjective
2. acting or driven with **force**. n

Definition of Force Dictionary Dot Com @
<http://dictionary.reference.com/browse/force>

"force [fawrs, fohrs] noun
2. **strength or power exerted upon an object; physical coercion; violence: ... to use force on a person.**
5. **Law. unlawful violence threatened or committed against persons or property."**

44. That Alan Rose is aware that Theodore is alleged to have acted in BREACH OF FIDUCIARY DUTIES and has failed to report this to the beneficiaries and interested parties or the authorities as may be required under Florida Rules of Professional Conduct and Law.

45. That Theodore, who is under ongoing investigations and knows Eliot is pursuing him and Alan through criminal authorities goes on to say,

“Anything and everything pertaining to iviewit, including his harassment of Jerry Lewin, Al Gortz of Proskauer and their firms. I want court proceedings, lawsuits, all correspondence to him and from him including paper and electronic, including video tapes and electronic interviews.”

Here the Court can see that Theodore is not concerned with a legal strategy pertaining to these Probate matters but more using the Legal Process to gain information for himself and his close personal friends Proskauer, Lewin and others to gain insight into Eliot’s legal strategies and ongoing state and federal actions against them.

46. That in Theodore's next claim comes threats to harass anyone helping Eliot, including his parents close friends that have information against Theodore and may be talking to investigators already and providing evidence against him, Alan, Spallina, Manceri, Pankauski, Moran, Baxley et al. Theodore and Alan want confidential information pertaining to the investigations and the way they strategize receiving this information is through LEGAL PROCESS ABUSE as stated in the letter. Theodore states he wants the production for the following reasons, all not relating to any upcoming hearing in Simon's Estate,

“All correspondence of every type with: walker, puzzio, SAHM, Diana banks, Scott banks, NACLERIO, Dietz, Gefen and every person on his email distribution list. If he doesn't comply, I want all of them deposed. Everything in which he has mentioned my name including emails, phone calls, letters, complaints to whatever agencies he has made complaints including police, federal, state, regulatory [emphasis added]. Everything and anything he is doing that we are not yet aware of such as online web site attacks.”

This statement fully exposes the nature of the sudden deposition request and production request by Alan, in which they intend to use this information not for the benefit of the Estates and Trusts but to further a legal abuse strategy to gain information regarding this highly confidential information about investigations of them that could expose many innocent third parties to harm and danger.

47. That Eliot therefore seeks a PROTECTIVE ORDER to protect him from “FORCEFUL” and “AGGRESSIVE” tactics that Theodore claims he wants Alan and others to use against Eliot to get this information to harm Eliot and others and therefore their discovery is being conducted with BAD INTENT and without legal or fiduciary authority as defined in the ALLEGED 2012 Amended and Restated Trust of Simon exhibited herein that PROHIBITS Theodore from acting as the Successor Trustee in the Simon Estate.

48. That until the Privilege claim is heard and the Motions to Remove Theodore and Alan are heard to determine if they are operating legally before this Court, this production and discovery could be used to cause physical and bodily harm to Eliot and others helping Eliot that these Discovery requests are designed by Alan and Theodore to achieve.

WHEREFORE, Eliot requests that this Court enter an order granting,

- I. NO FURTHER DISCOVERY TO THEODORE, ALAN OR JOHN PANKAUSKI UNTIL THIS COURT CAN DETERMINE IF THESE REQUESTS ARE MADE IN GOOD FAITH BY LEGALLY QUALIFIED COUNSEL AND FIDUCIARIES FIRST,
- II. A PROTECTIVE ORDER FOR ELIOT, HIS FAMILY and ALL THOSE MENTIONED IN ALAN AND THEODORES LETTER WHO THEY ARE TARGETING AND HAVE CONSPIRED TO USE FORCE AND AGRESSION AGAINST.

Filed on Monday, June 30, 2014

Eliot Bernstein, Pro Se, Individually and as legal guardian on behalf of his three minor children.

X

Candice Bernstein, Pro Se, as legal guardian on behalf of her three minor children.

X

III. Candice Bernstein be added to the case as a Petitioner, as Guardian to her three minor children, necessitated by the threat of force against her husband Eliot that could result in bodily harm or death to him, and leaving no natural guardian protecting their children.

CERTIFICATE OF SERVICE

I, ELIOT IVAN BERNSTEIN, HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email to all parties on the following Service List, Monday, June 30, 2014.

Eliot Bernstein, Pro Se, Individually and as legal guardian on behalf of his three minor children

X

SERVICE LIST

<p>RESPONDENT PERSONALLY, PROFESSIONALLY, AS A GUARDIAN AND TRUSTEE FOR MINOR/ADULT CHILDREN, AS AN ALLEGED TRUSTEE AND ALLEGED PERSONAL REPRESENTATIVE</p> <p>Theodore Stuart Bernstein Life Insurance Concepts 950 Peninsula Corporate Circle, Suite 3010 Boca Raton, Florida 33487 tbernstein@lifeinsuranceconcepts.com</p>	<p>RESPONDENT INDIVIDUALLY, PROFESSIONALLY AND LAW FIRM and COUNSEL TO THEODORE BERNSTEIN IN VARIOUS CAPACITIES</p> <p>Alan B. Rose, Esq. Page, Mrachek, Fitzgerald & Rose, P.A. 505 South Flagler Drive, Suite 600 West Palm Beach, Florida 33401 (561) 355-6991 arose@pm-law.com and arose@mrachek-law.com mchandler@mrachek-law.com cklein@mrachek-law.com lmrachek@mrachek-law.com rfitzgerald@mrachek-law.com skonopka@mrachek-law.com dthomas@mrachek-law.com gweiss@mrachek-law.com jbaker@mrachek-law.com mchandler@mrachek-law.com lchristian@mrachek-law.com tclarke@mrachek-law.com gdavies@mrachek-law.com pgillman@mrachek-law.com</p>	<p>RESPONDENT INDIVIDUALLY, PROFESSIONALLY AND LAW FIRM and COUNSEL TO THEODORE BERNSTEIN IN VARIOUS CAPACITIES</p> <p>John J. Pankauski, Esq. Pankauski Law Firm PLLC 120 South Olive Avenue 7th Floor West Palm Beach, FL 33401 (561) 514-0900 courtfilings@pankauskilawfirm.com john@pankauskilawfirm.com</p>	<p>RESPONDENT INDIVIDUALLY, PROFESSIONALLY AND LAW FIRM AND AS FORMER COUNSEL TO THEODORE BERNSTEIN IN VARIOUS CAPACITIES</p> <p>Robert L. Spallina, Esq., Tescher & Spallina, P.A. Boca Village Corporate Center I 4855 Technology Way Suite 720 Boca Raton, FL 33431 rspallina@tescherspallina.com kmoran@tescherspallina.com ddustin@tescherspallina.com</p>
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	dkelly@mrachek-law.com cklein@mrachek-law.com lwilliamson@mrachek-law.com		
<p>RESPONDENT INDIVIDUALLY AND AS GUARDIAN AND TRUSTEE OF HER MINOR CHILD</p> <p>Pamela Beth Simon 950 N. Michigan Avenue Apartment 2603 Chicago, IL 60611 psimon@stpcorp.com</p>	<p>COUNSEL FOR LIMITED APPEARANCE representing Mr. Tescher in connection with his Petition for Designation and Discharge as Co-Personal Representative of the Estate of Simon L. Bernstein, deceased.</p> <p>Irwin J. Block, Esq. The Law Office of Irwin J. Block PL 700 South Federal Highway Suite 200 Boca Raton, Florida 33432 ijb@ijblegal.com martin@kolawyers.com</p>	<p>RESPONDENT INDIVIDUALLY, PROFESSIONALLY AND LAW FIRM and FORMER WITHDRAWN COUNSEL TO THEODORE BERNSTEIN IN VARIOUS CAPACITIES, NO NOTICES OF APPEARANCES</p> <p>Mark R. Manceri, Esq., and Mark R. Manceri, P.A., 2929 East Commercial Boulevard Suite 702 Fort Lauderdale, FL 33308 mrmlaw@comcast.net mrmlaw1@gmail.com</p>	<p>RESPONDENT INDIVIDUALLY, PROFESSIONALLY AND LAW FIRM AND AS FORMER COUNSEL TO THEODORE BERNSTEIN IN VARIOUS CAPACITIES</p> <p>Donald Tescher, Esq., Tescher & Spallina, P.A. Boca Village Corporate Center I 4855 Technology Way Suite 720 Boca Raton, FL 33431 dtescher@tescherspallina.com dtescher@tescherspallina.com ddustin@tescherspallina.com kmoran@tescherspallina.com</p>

A large, handwritten signature in blue ink is written across the bottom of the page. Below the signature is a circular blue ink stamp, possibly a fingerprint or a seal, which is partially obscured by the signature.

<p>RESPONDENT INDIVIDUALLY AND AS GUARDIAN AND TRUSTEE OF HER MINOR CHILD</p> <p>Jill Iantoni 2101 Magnolia Lane Highland Park, IL 60035 jilliantoni@gmail.com</p>	<p>COUNSEL TO CREDITOR WILLIAM STANSBURY</p> <p>Peter Feaman, Esquire Peter M. Feaman, P.A. 3695 W. Boynton Beach Blvd. Suite #9 Boynton Beach, FL 33436 Tel: 561.734.5552 Fax: 561.734.5554 pfeaman@feamanlaw.com service@feamanlaw.com mkoskey@feamanlaw.com</p>	<p>COURT APPROVED CURATOR TO REPLACE THE REMOVED FORMER PERSONAL REPRESENTATIVES/CO-TRUSTEES/COUNSEL TO THEMSELVES AS FIDUCIARIES TESCHER AND SPALLINA</p> <p>Benjamin Brown, Esq., Thornton B Henry, Esq., and Peter Matwiczky Matwiczky & Brown, LLP 625 No. Flagler Drive Suite 401 West Palm Beach, FL 33401 bbrown@matbrolaw.com attorneys@matbrolaw.com bhenry@matbrolaw.com pmatwiczky@matbrolaw.com</p>	<p>COUNSEL FOR JILL IANTONI and LISA FRIEDSTEIN</p> <p>William M. Pearson, Esq. P.O. Box 1076 Miami, FL 33149 wpearsonlaw@bellsouth.net</p>
<p>RESPONDENT INDIVIDUALLY AND AS GUARDIAN AND TRUSTEE OF HER MINOR CHILD</p> <p>Lisa Friedstein 2142 Churchill Lane Highland Park, IL 60035 lisa@friedsteins.com lisa.friedstein@gmail.com lisa@friedsteins.com</p>	<p>COUNSEL FOR JILL IANTONI and LISA FRIEDSTEIN</p> <p>William H. Glasko, Esq. Golden Cowan, P.A. 1734 South Dixie Highway Palmetto Bay, FL 33157 bill@palmettobaylaw.com eservice@palmettobaylaw.com m@tmealy@gcprobate.com</p>	<p>RESPONDENT – ADULT CHILD</p> <p>Alexandra Bernstein 3000 Washington Blvd, Apt 424 Arlington, VA, 22201 alb07c@gmail.com</p>	<p>RESPONDENT/ARRESTED AND CONVICTED OF FRAUD AND ADMITTED TO FORGERY OF SIX SIGNATURES, INCLUDING POST MORTEM FOR SIMON/HAS HAD NOTARY PUBLIC LICENSE REVOKED BY FLORIDA GOVERNOR RICK SCOTT NOTARY PUBLIC DIVISION. *See notes</p> <p>Kimberly Moran kmoran@tescherspallina.com</p>
<p>RESPONDENT – ADULT CHILD</p> <p>Eric Bernstein 2231 Bloods Grove Circle Delray Beach, FL 33445 eberstein@lifeinsuranceconcepts.com m edb07@fsu.edu edb07fsu@gmail.com</p>	<p>RESPONDENT – INITIALLY MINOR CHILD AND NOW ADULT CHILD</p> <p>Michael Bernstein 2231 Bloods Grove Circle Delray Beach, FL 33445 mchl_bernstein@yahoo.com</p>		<p>COUNSEL TO ALEXANDRA, ERIC AND MICHAEL BERNSTEIN AND MOLLY SIMON</p> <p>John P Morrissey, Esq. John P. Morrissey, P.A. 330 Clematis Street Suite 213 West Palm Beach, FL 33401 john@jmorrisseylaw.com</p>

<p>RESPONDENT – ADULT, STEPSON TO THEODORE</p> <p>Matt Logan 2231 Bloods Grove Circle Delray Beach, FL 33445 matl89@aol.com</p>	<p>RESPONDENTS – MINOR CHILDREN OF PETITIONER</p> <p>Joshua, Jacob and Daniel Bernstein, Minors c/o Eliot and Candice Bernstein, Parents and Natural Guardians 2753 NW 34th Street Boca Raton, FL 33434 iviewit@iviewit.tv</p>	<p>RESPONDENT – MINOR CHILD</p> <p>Julia Iantoni, a Minor c/o Guy and Jill Iantoni, Her Parents and Natural Guardians 210 I Magnolia Lane Highland Park, IL 60035 jilliantoni@gmail.com</p>	
<p>RESPONDENT/REPRIMANDED BY FLORIDA GOVERNOR RICK SCOTT NOTARY PUBLIC DIVISION FOR FAILING TO NOTARIZE AN ALLEGED 2012 WILL AND TRUST OF SIMON AND SIGNING NOTARY UNDER FALSE NAME</p> <p>Lindsay Baxley aka Lindsay Giles lindsay@lifeinsuranceconcepts.com</p>	<p>RESPONDENT MINOR CHILDREN</p> <p>Carley & Max Friedstein, Minors c/o Jeffrey and Lisa Friedstein Parents and Natural Guardians 2142 Churchill Lane Highland Park, IL 6003 Lisa@friedsteins.com lisa.friedstein@gmail.com</p>	<p>RESPONDENT – MINOR CHILD INITIALLY NOW ADULT CHILD</p> <p>Molly Simon 1731 N. Old Pueblo Drive Tucson, AZ 85745 molly.simon1203@gmail.com</p>	