

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

TED BERNSTEIN, as Trustee  
of the Shirley Bernstein Trust Agreement  
dated May 20, 2008, as amended,

PROBATE DIVISION

FILE NO.: 502014CP003698XXXXSB

Plaintiff,

vs.

ALEXANDRA BERNSTEIN; ERIC BERNSTEIN;  
MICHAEL BERNSTEIN; MOLLY SIMON;  
PAMELA B. SIMON, Individually and as Trustee  
f/b/o Molly Simon under the Simon L. Bernstein  
Trust Dtd 9/13/12; ELIOT BERNSTEIN, Individually,  
as Trustee f/b/o D.B., Ja. B. and Jo. B. under the  
Simon L. Bernstein Trust Dtd 9/13/12, and on  
behalf of his minor children, D.B., Ja. B. and Jo. B.;  
JILL IANTONI, Individually, as Trustee f/b/o J.I.  
under the Simon L. Bernstein Trust Dtd 9/13/12, and  
on behalf of her minor child J.I.; MAX FRIEDSTEIN;  
LISA FRIEDSTEIN, Individually, as Trustee f/b/o  
Max Friedstein and C.F., under the Simon L.  
Bernstein Trust Dtd 9/13/12, and on behalf of her  
minor child C.F.,

Defendants.

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**FIRST REQUEST TO PRODUCE  
TO DEFENDANT, JILL IANTONI**

Defendants, MOLLY SIMON, ALEXANDRA BERNSTEIN, ERIC BERNSTEIN and  
MICHAEL BERNSTEIN, by and through their undersigned attorney and pursuant to  
Fla.R.Civ.P. 1350, request that Defendant, JILL IANTONI, produce the following documents for  
inspection and copying in accordance with the aforementioned rule:

### **Definitions**

1. The term "Jill" shall refer to Defendant, Jill Iantoni, individually, as Trustee f/b/o J.I. under the Simon I. Bernstein Trust dated September 13, 2012, and on behalf of her minor child, J.I.
2. The term "Lisa" shall refer to Defendant, Lisa Friedstein, individually, as Trustee f/b/o Max Friedstein and C.F. under the Simon L. Bernstein Trust dated September 13, 2013, and on behalf of her minor child, C.F.
3. The term "Jeff" shall refer to Lisa's husband, Jeff Friedstein.
4. The term "Pam" shall refer to Defendant, Pamela Simon, individually and as Trustee f/b/o Molly Simon under the Simon L. Bernstein Trust dated September 13, 2013.
5. The term "Ted" shall refer to Plaintiff, Ted Bernstein.
6. The term "Simon" shall refer to Simon Bernstein, Deceased.
7. The term "Shirley" shall refer to Shirley Bernstein, Deceased.
8. The term "Shirley's Trust" shall refer to the Shirley Bernstein Trust Agreement dated May 28, 2008, as amended.
9. The term "Simon's Trust" shall refer to the Simon L. Bernstein Trust dated September 13, 2012.

### **Document Requests**

1. All documents which indicate or evidence any financial support that Jill received from either Simon or Shirley during the period from Jill's high school graduation through September 30, 2012, including (without limitation) airline tickets or receipts, hotel receipts, cruise tickets or receipts, college tuition statements, and housing payments or rental receipts.
2. All documents which indicate or evidence any gifts or other transfers of assets from either Simon or Shirley to Jill during the period from Jill's high school graduation through September 30, 2012.
3. All documents which constitute, refer or relate to any checks, business

distributions, and/or corporate shares evidencing payments and/or transfers to Jill from any business owned in whole or in part by Simon.

4. All documents which indicate or evidence any financial support that any member of Jill's family (including J.I.) received from either Simon or Shirley.
5. All documents which indicate or evidence any gifts or other transfers of assets from either Simon or Shirley to any member of Jill's family (including J.I.).
6. All documents which indicate or evidence any financial support that Shirley received from Jill during Shirley's lifetime.
7. All documents which indicate or evidence any financial support that Simon received from Jill during Simon's lifetime.
8. All documents which indicate or evidence any gifts or other transfers of assets from either Simon or Shirley to Pam during the period from Pam's high school graduation through September 30, 2012.
9. All documents which indicate or evidence any gifts or other transfers of assets from either Simon or Shirley to Ted during the period from Ted's high school graduation through September 30, 2012.
10. All documents which refer or relate to Simon's business interests from 1987 through 2012, including the name of the company owned (if any), the business conducted by the company, and the financial position of the company (including assets, liabilities, net worth and liquidity).
11. All documents refer or relate to Simon's financial position each year from 1987 through 2010, including assets, liabilities, investments, liquid assets and net worth.
12. All documents which refer or relate to Shirley's financial position each year from 1987 through 2010, including assets, liabilities, investments, liquid assets and net worth.
13. All documents which indicate or evidence any assets, whether real or personal, tangible or intangible, owned by Simon, either individually or jointly with any other person.
14. All documents which indicate or evidence any assets, whether real or personal,



tangible or intangible, owned by any Trust established by Simon.

15. All documents which indicate or evidence any assets, whether real or personal, tangible or intangible, owned by Shirley, either individually or jointly with any other person.
16. All documents which indicate or evidence any assets, whether real or personal, tangible or intangible, owned by any Trust established by Shirley.
17. All document which constitute, refer or relate to Simon's exercise of his power of appointment in Shirley's Trust.
18. All documents which refer or relate to the validity, authenticity and/or enforceability of Simon's Trust.
19. All documents which refer or relate to the validity, authenticity and/or enforceability of Simon's Trust.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via e-mail to:

ALAN ROSE, Esquire, 505 South Flagler Drive, Suite 600, West Palm Beach, Florida 33401  
([arose@pm-law.com](mailto:arose@pm-law.com)); ELIOT BERNSTEIN, 2753 NW 34<sup>th</sup> Street, Boca Raton, Florida 33434  
([iviewit@iviewit.tv](http://iviewit.tv)); PAMELA SIMON, 303 East Wacker Drive, Suite 2725, Chicago, Illinois  
60601 ([psimon@stpcorp.com](mailto:psimon@stpcorp.com)); LISA FRIEDSTEIN ([lisa.friedstein@gmail.com](mailto:lisa.friedstein@gmail.com)); and JILL  
IANTONI ([jilliantoni@gmail.com](mailto:jilliantoni@gmail.com)), this 25<sup>TH</sup> day of November, 2014.

JOHN P. MORRISSEY, P.A.

By: 

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