In THE CIRCUiT COURT OF THE FIFTEEN JUDICIAL CIRCUIT

IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE: THE ESTATE OF CASE no. 502012CP004391XXXXSB

SIMON BERNSTEIN,

Deceased HON. JUDGE MARTIN H. COLIN

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

Eliot ivan bernstein, PRO SE

Petitioner,

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 ;
Jacob noah archie Bernstein;

Daniel Elijsha Abe Ottomo Bernstein; ALEXANDRA bernstein;

ERIC BERNSTEIN;
Michael bernstein;
MATTHEW LOGAN;
Molly norah simon;
Julia iantoni ;

Max FRIEDSTEIN;

CARLY FRIEDSTEIN;

JOHN AND JANE DOE (1-5000).
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**MOTION IN OPPOSITION TO PERSONAL REPRESENTATIVES “MOTION FOR INSTRUCTIONS AND/OR MOTION TO COMPEL COMPLIANCE WITH COURT'S ORDER DATED SEPTEMBER 18, 2014; MOTION TO EXTEND TIME”**

COMES NOW, ELIOT BERNSTEIN (“Eliot”) individually and on behalf of his three minor children, all alleged Beneficiaries of the Estate and Trusts of Simon L. Bernstein, pursuant to Florida Rule of Civil Procedure 1.350 and hereby requests Brain O’Connell, Esq. in his capacity as Personal Representative of the estate of Simon L. Bernstein to produce the following at the home of address of ELIOT BERNSTEIN at 2753 NW 34th St., Boca Raton, FL 33432 on or before the thirtieth (30th) day after service of this request and further requests that information pertinent to the FINAL ACCOUNTING submitted by the former Co-Personal Representatives, Robert Spallina, Esq. and Donald Tescher, Esq. and former Curator, Benjamin Brown, Esq. be turned over as requested herein.

1. As the Court will note, Eliot in his request for production put the following statement in the beginning of the pleading that stated to the PR, Brian O’Connell, Esq. (“O’Connell”), “You do not need to produce Tescher & Spallina, PA’s documents turned over to Benjamin Brown, Esq. (“Brown”) to the Estate by (T&S) that are Bates Numbered TS000001 through TS007421 but any and all records turned over by Brown not within the Bates range.
2. That when Eliot contacted the Curator for the Estate, Benjamin Brown, Esq. (“Brown”), for production of the records necessary for the Objections to the Final Accounting and other items, Brown stated that all Eliot need to do to compel his production of the records was to simply file a production request with the Court and the Estate would comply and this was all then complied with and Brown turned over the records and privilege log as requested.
3. That Eliot claims that the information requested from O’Connell is not voluminous and is simply a request for any new materials that the Estate has come into possession of since the last production was turned over by Brown in May 2014,
4. Eliot’s document and financial production request is for primarily items that have been suppressed and denied to beneficiaries for over two years due to the misconduct by the prior Fiduciaries and Counsel to Simon’s Estate and this information is absolutely necessary for the upcoming hearings on objections to the Final Accounting, which cannot be completed until all this financial information is obtained and disclosed.
5. As the Court can see the request for production is factually based on the Objection to the Final Accounting filed by Eliot, due to the fact that the Final Accounting had virtually no back up or supporting information in gross violation of Generally Accepted Accounting Principles (GAAP) and Probate Accounting rules and statutes.
6. Due to the fact that the prior fiduciaries when removed by the Court and Ordered to produce all records to the Curator Brown, only turned over scant and incomplete records, NO ORIGINAL DOCUMENTS, account histories that started post mortem, missing beneficiaries on IRA’s and Life Insurance Policies, missing accounts entirely, NO MAIL for the decedent from the date of death, no corporate records for the decedent, no tax returns for the decedent and more. The fact that virtually nothing was turned over by the disgraced former counsel and fiduciaries exhibits their continued misconduct that is costing time and effort on everyone to recreate in efforts to further cover-up additional crimes and civil torts alleged against them in state and federal venues.
7. That for example, Brown had ordered a wealth of information pertinent to the hearings on the final accountings before turning over the reigns to O’Connell, such as tax returns that are missing from the records of the Estate that were ordered certified from the IRS over six months ago. If these documents have been received by Brown or O’Connell they must be produced as requested.
8. That for example, Brown also had ordered account information from JP Morgan regarding the IRA over six months ago and this also would need to be produced before anything can be done with the IRA, as the beneficiaries are missing and all statements are missing other than post mortem statements provided by Tescher and Spallina and the statements are only photocopies, as with all the records turned over, NO ORIGINAL DOCUMENTS.
9. That any information collected by Brown and O’Connell since Brown’s original production now must be produced timely as requested, as all of this material is pertinent to the upcoming hearings and future hearings and is essential in the name of transparency.
10. That any items requested for production that the Estate does not yet have information on at this time must be at minimum addressed with a simple statement to such affect,
11. That any items requested that the Estate has and feels are privileged or confidential must be identified in a privileged log.
12. That this Court must keep open the transparency to beneficiaries started with Brown’s appointment as Curator and keep the flow of information fluid between the new Estate PR, O’Connell and the Beneficiaries and Interested Parties, as there are also ongoing state and federal investigations and civil proceedings that also seek information regarding the requested production documents, including missing assets, missing documents, missing beneficiaries, missing trusts and more. To deny production would be to hamper the rights of the beneficiaries to object to any accountings properly with so much missing information still being obtained by the Estate.
13.
14. You do not need to produce Tescher & Spallina, PA’s documents turned over to Benjamin Brown, Esq. (“Brown”) to the Estate by (T&S) that are Bates Numbered TS000001 through TS007421 but any and all records turned over by Brown not within the Bates range.
15. Due to admitted, acknowledged and prosecuted FRAUD and admitted FORGERY and more of the prior Co-Personal Representatives, Tescher & Spallina, their law firm, Tescher & Spallina, PA and others, Petitioner requests a time to copy and photograph all ORIGINAL SIGNED DOCUMENTS in your possession to further verify the authenticity of such documents.
16. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all backup materials necessary to evaluate the Final Accounting entries of Tescher & Spallina, PA.
17. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any prior accountings.
18. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to tax returns for 2009-present.
	1. Federal & State
		1. Estate & Trust.
		2. Personal and Business.
19. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to signed tax returns sent by the IRS upon request by Benjamin Brown, Esq. to the Estate for 2009-present.
	1. Federal & State
		1. Estate & Trust.
		2. Personal and Business.
20. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any insurance commissions from any carriers to Decedent, including but not limited to, statements/checks from all companies made payable to Decedent or LIC Holdings or any other entity Decedent had interest in for the years 2010-2015.
21. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to 1099's issued from all entities to Decedent for the years 2010-2105.
22. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to 1099's issued from Decedent, his businesses or the Estate to any party for 2010-2014.
23. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Monarch Life Proceeds checks or other information.
24. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the copy of the US Treasury (tax refund).
25. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to documentation regarding the “Fee Reimbursement from Shirley Bernstein Trust,” including but not limited to, copies of checks (front and back) and other documentation.
26. Regarding Note 1 on Schedule A, Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of checks (front and back) and any other supporting documents regarding this reimbursement?
27. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to backup documentation of the Required Minimum Distribution from Decedent Simon’s IRA’s, including but not limited to, JP Morgan account (ending 5007) and any predecessor or successor accounts. Produce IRA account statements for 2009-2015 for Simon and 2005-2010 for Shirley Bernstein’s IRA.
28. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to backup documentation of the Sabadell account (ending 7176).
	1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to account statements for 2009-2015.
29. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to backup documentation of the JP Morgan account (ending 5220) and any predecessor or successor accounts.
	1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to account statements for 2009-2014.
30. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all relevant documents and other information for Fees and Costs billed by Tescher & Spallina, P.A.
31. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all accountings and other information regarding their fees from the period of 2007-2015.
32. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all retainer agreements for Tescher & Spallia, P.A.
33. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all relevant documents and other information for Fees and Costs billed by Mark R. Manceri, P.A.
34. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all accountings and other information regarding their fees from the period of 2007-2015.
35. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all retainer agreements for Mark R. Manceri, P.A.
36. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all document and information regarding Bernstein Family Realty, LLC (“BFR”).
37. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any loans to BFR.
38. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the cancelled check payable to CASH (written pre death) by Decent as listed in Tescher & Spallina’s Final Accounting?
39. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to documents and information regarding the “interest payment on LLLP Loan (autopay) as listed in the Tescher & Spallina, PA Final Accounting.
40. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the cancelled check listed.
41. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to loan documentation listed.
42. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and information regarding the American Pioneer Premium (autopay) as identified on the Tescher & Spallina PA Final Accounting.
43. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the cancelled checks, statements, etc.
44. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the contract this was paid under.

PRODUCTION PERTAINING TO FINAL ACCOUNTING OF TESCHER & SPALLINA

1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the “Unknown – Check written pre death.”
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the Wells Fargo Interest Payment check (HELOC) and any account statements or information.
3. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the loan or other instrument this interest was due from.
4. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the account.
5. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the Internal Revenue Service check and the corresponding tax form that it was paid on.
6. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the Bank Expense to (close Legacy Account) and all Legacy accounts held by Decedent, including statements, closing information, etc.
7. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the Jewelry Appraisal.
8. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to an inventory of all jewelry you have in your possession all Jewelry on that inventory?

Schedule C

1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and other information regarding the “Required Min. Distribution to Simon Estate Acct JPM (#Ending 5220).
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the account.

Schedule D

1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and other information regarding the BFR Note 1 and 2.
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the the accrued legal fees from Simon Bernstein 1995 Insurance Trust payable to the Estate of Simon Bernstein (Note 3).
3. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the Simon Bernstein 1995 Insurance Trust.
4. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the retainer agreements for the services billed.
5. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to legal fee billings and details.
6. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the “Net change in Simon Bernstein IRA (ending 5007).

SCHEDULE D – NOTES

1. Note 1 – Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the Note 1.
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the “autopay months” cited and bank account information.
3. Note 2 – Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the Note 2.
4. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the billings for these fees to BFR.
5. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of Tescher & Spallina retainer with BFR.
6. Note 3 – Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding Simon Bernstein 1995 Insurance Trust.
7. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the billings for these fees to Simon Bernstein 1995 Insurance Trust.
8. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of Tescher & Spallina retainer with Simon Bernstein 1995 Insurance Trust.
9. Note 4- Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the Note 4.
10. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the $50000 distribution check.
11. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the statements for the account distribution was taken from.

SCHEDULE E

1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to furniture appraisal for Boca Home St. Andrews?
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any items went.
3. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to furniture appraisal for Boca Condo?
4. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any items went.
5. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Jewelry appraisals.
6. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of Jewelry.
7. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any jewelry went.
8. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the “Secured Promissory Note” for BFR?
9. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding Simon Bernstein IRA account information and Shirley Bernstein IRA account information.
10. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the entry “Due from Bernstein Family Realty” amount of $25000.
11. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the entry “Due from Simon Bernstein 95 Insurance Trust.”
12. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements, valuations, stock certificates, buy-sell or any other information regarding LIC Holdings, Inc.
13. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding Sabadell Account (ending 7176).
14. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the JP Morgan account (ending 5220).
15. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding the Stanford Bank accounts and Stanford lawsuit information.
16. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any account documents, statements or information regarding Oppenheimer accounts information.

**FURTHER REQUESTS FOR PRODUCTION**

1. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the Estate and Trusts of Simon L. Bernstein that were turned over to your office by Benjamin Brown, Esq. and any subsequent physical evidence, tangible things and property that have come into your possession.
2. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and all physical evidence that were collected by you from any party regarding the Estate and Trusts.
3. Please provide a time to inspect all physical evidence in your possession.
4. Please produce all documents, all physical evidence, tangible things and property 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 all documents, all physical evidence, tangible things and property that evidence or relate to any and all fee arrangements, fee agreements, retainer agreements, bills, account statements and settlement sheets that for any attorney, consultant, accountant, fiduciaries who have been paid for rendering services to the Estate.
6. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to pieces of jewelry that that belonged to the Decedent at any point in time during the last seven years, including Jewelry transferred to Decedent by his pre deceased spouse Shirley Bernstein.
7. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the St. Andrews home at 7020 Lions Head Lane, Boca Raton, FL 33496, including furnishings, artwork and other possessions.
8. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the Boca Raton Beach Condominium at the Aragon, 2494 South Ocean Boulevard, Boca Raton, 33432, including, furnishings, artwork and other possessions.
9. Please produce all Simon Bernstein US Postal mail or any other mail service collected by the Estate since 2012.
10. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to decedents business possessions for any and all businesses where interest are held, including the contents of his office located at 950 Peninsula Corporate Circle, Suite 3010, Boca Raton, FL 33487.
11. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any life insurance policy or other insurance contract or information.
12. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a SB Lexington VEBA Plan and Trust or any other VEBA Plan and Trust that Simon Bernstein was a member of.
13. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a S.B. Lexington Inc. Death Benefit Plan United Bank of Illinois NA (ein 363479122).
14. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any IRA or other qualified plan accounts.
15. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any federal or state tax returns.
16. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any Mortgages and/or Lines of Credit
17. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any insurance loans, withdrawals, etc.
18. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any pension /profit sharing plans.
19. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any Stanford Lawsuit Interests of decedent.
20. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any settlements with the Estate or proposed settlements with the estate from any party.
21. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any accounts held or administered by the Estate for Simon Bernstein, including all transactions of any type and account statements from inception to present.
22. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any patent interest holdings for the following intellectual properties either directly or through any corporate interests held by Simon Bernstein:
23. 09/630,939 System & Method for Providing an Enhanced Digital Image File
24. PCT/US00/21211 System & Method for Providing an Enhanced Digital Image File
25. 75/725,802 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
26. 09/630,939 System & Method for Providing an Enhanced Digital Image File
27. PCT/US00/15602 System & Method for Video Playback Over a Network
28. 75/725,805 IVIEWIT "YOUR THIRD EYE TO THE WORLD" June 8, 1999 FILED July 27, 2004
29. 09/630,939 System & Method for Providing an Enhanced Digital Image File
30. PCT/US00/15406 System & Method for Playing a Digital Video File
31. 15406 Part 1 Attachment
32. 15406 Part 2 Attachment
33. 15406 Part 3 Attachment
34. 75/725,806 IVIEWIT "YOUR THIRD EYE TO THE WORLD" June 8, 1999 FILED July 27, 2004
35. 09/522,721 Apparatus & Method for Producing Enhanced Digital Images
36. PCT US00/15408 System & Method for Streaming an Enhanced Digital Video File
37. 75/725,807 IVIEWIT 'YOUR THIRD EYE TO THE WORLD" (THIS MARK IS MISSING PROPER QUOTES June 8, 1999 FILED July 27, 2004
38. 09/587,734 System & Method for Providing an Enhanced Digital Video File
39. PCT/US00/15405 System & Method for Providing an Enhanced Digital Video File
40. 75/725,808 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
41. 09/587,734 System & Method for Providing an Enhanced Digital Video File
42. PCT US00/07772 Apparatus & Method for Producing Enhanced Digital Images
43. 75/725,809 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
44. 09/587,026 System & Method for Playing a Digital Video File
45. EPO 00938126.0 System & Method for Streaming an Enhanced Digital Video File
46. 75/725,810 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
47. 09/587,730 System & Method for Streaming an Enhanced Digital Video File
48. EPO 00944619.6 System & Method for Streaming an Enhanced Digital Video File
49. 75/725,816 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
50. 60/223,344 Zoom & Pan Using a Digital Camera
51. EPO 00955352.0 System & Method for Providing an Enhanced Digital Image File
52. 75/725,816 IVIEWIT June 8, 1999 FILED July 27, 2004
53. 60/233,341 Zoom & Pan Imaging Design Tool
54. Japan 2001 502364 System & Method for Streaming an Enhanced Digital Video File
55. 75/725,817 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
56. 60,169,559 Apparatus and Method for Producing Enhanced Video Images and/or Video Files
57. Japan 2001 502362 System & Method for Streaming an Enhanced Digital Video File
58. 75/725,817 IVIEWIT June 8, 1999 FILED July 27, 2004
59. 60/155,404 Apparatus & Method for Producing Enhanced Video Images and/or Video Files
60. Japan 2001 514379 System & Method for Providing an Enhanced Digital Image File
61. 75/725,818 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
62. 60/149,737 Apparatus and Method for Producing Enhanced Digital Images and/or Digital Video Files
63. Korea PCT US00 15408
64. 75/725,819 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
65. 60/146,726 Apparatus & Method for Producing Enhanced Digital Images
66. 75/725,819 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
67. 60/141,440 Apparatus & Method for Providing and/or transmitting Video Data and/or Information in a Communication Network
68. 75/725,820 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
69. 60/137,921 Apparatus & Method for Playing Video Files Across the Internet
70. 75/725,821 IVIEWIT June 8, 1999 FILED July 27, 2004
71. 60/137,297 Apparatus & Method for Producing Enhanced Video Images
72. 75/725,821 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
73. 60/125,824 Apparatus & Method for Producing Enhanced Digital Images
74. 75/725,822 IVIEWIT June 8, 1999 FILED July 27, 2004
75. 75/725,823 IVIEWIT June 8, 1999 FILED July 27, 2004
76. 75/725,823 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
77. 76/037,700 IVIEWIT.COM May 1, 2000 FILED July 27, 2004
78. 76/037,701 A SITE FOR SORE EYES May 1, 2000 FILED July 27, 2004
79. 76/037,702 A SITE FOR SORE EYES May 1, 2000 FILED July 27, 2004
80. 76/037,703 IVIEWIT May 1, 2000 FILED July 27, 2004
81. 76/037,843 IVIEWIT LOGO May 1, 2000 FILED July 27, 2004
82. 76/037,844 May 1, 2000 FILED July 27, 2004
83. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to estate planning documents including all Wills and Trusts for Shirley Bernstein and Simon Leon Bernstein, whether qualified or contingent from 2000-2012.
84. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all estate planning documents including all Wills and Trusts that the children, Joshua, Jacob and Daniel, are named as beneficiary, whether qualified or contingent 2000-2012.
85. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents executed in May and June 2012 regarding the Last Will and Testament of Simon and Shirley Bernstein.
86. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Trust Accounting and Assets for “Simon L. Bernstein Amended and Restated Trust Agreement” dated July 25, 2012.
87. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the May 20, 2008 Simon Bernstein Trust.
88. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Trust Accounting and Assets for “Shirley Bernstein Trust Agreement” dated May 20, 2008.
89. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to 1995 Simon Bernstein Irrevocable Insurance Trust.
90. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for SIMON BERNSTEIN IRREVOCABLE TRUST U/A 9/7/06.
91. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for MARITAL TRUST and FAMILY TRUST created by SHIRLEY BERNSTEIN, Trustee of the SHIRLEY BERNSTEIN TRUST AGREEMENT dated May 20, 2008.
92. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for SIMON L. BERNSTEIN and SHIRLEY BERNSTEIN, Co-Trustees and ROBERT L. SPALLINA, Independent Trustee of the ELIOT BERNSTEIN FAMILY TRUST dated May 20, 2008.
93. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for DANIEL BERNSTEIN IRREVOCABLE TRUST dated September 7, 2006.
94. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for JAKE BERNSTEIN IRREVOCABLE TRUST dated September 7, 2006.
95. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for JOSHUA Z. BERNSTEIN IRREVOCABLE TRUST dated September 7, 2006.
96. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for Case: 502010CP003123XXXXSB INRE DANIEL BERNSTEIN IRREVOCABLE TRUST 07-JUL-10 0497381 ATTORNEY SPALLINA, ROBERT L.
97. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for Case: 502010CP003125XXXXSB INRE JAKE BERNSTEIN IRREVOCABLE TRUST 07-JUL-10 0497381 ATTORNEY SPALLINA, ROBERT L
98. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records for Case: 502010CP003128XXXXSB INRE JOSHUA Z BERNSTEIN IRREVOCABLE TRUST 07-JUL-10 0497381 ATTORNEY SPALLINA, ROBERT L.
99. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any claims filed in the Estate of Shirley Bernstein and Simon Bernstein.
100. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to allocation of the tangible personal property of Shirley and Simon Bernstein.
101. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Appraisals of tangible personal property, specifically the jewelry, artwork and collectibles.
102. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents relating to the life insurance policies owned by Shirley and/or Simon, insuring Shirley and/or Simon's life, or for the benefit of Shirley and/or Simon Bernstein. Include any loans or withdrawal statements for 2000-2013.
103. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Documentation concerning the allocation and division of all companies owned by Simon and/or Shirley at the time of their deaths and copies of any partnerships, operating, or stockholders agreements.
104. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records relating to of the ongoing litigation involving William Stansbury.
105. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Records relating to ongoing litigation involving Bernstein Family Realty, LLC.
106. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Information with regards to the, grade school, middle school, high school and college funds set aside for by Simon or Shirley Bernstein for the benefit of Joshua, Jacob and/or Daniel schooling.
107. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Objections to claims filed in Estate of Simon Bernstein.
108. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Exempt Property Petition filed.
109. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Limited Power of Appointment executed by Simon.
110. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Mortgage documents and Promissory Note relating to Eliot's children’s home and documents pertaining to first mortgage Walter Sahm.
111. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Heritage Union Life Insurance Contract and any other insurance policies.
112. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Full documentation for Proskauer Rose’s Will Exhibit in the Will of Simon filed in the Court Docket and all estate and trust work relating to the Proskauer work product for Simon and Shirley their children.
113. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to records for Simon and Shirley Estate assets from years 2000-2014, including but not limited to, banking records, investment accounts, business accounts, tax returns for both Simon and Shirley personally and for all business entities, real estate, transfers, titles, deeds, all insurance contracts, IRA’s, pensions, retirement plans of any sort and any other records necessary to ascertain and account for the assets in the Estates.
114. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all records relating to Simon Bernstein’s Life Insurance License and all, agent, agency, renewal commissions payable to decedent, including but not limited to:

Licensee Details 12/8/2013

Name of Licensee: BERNSTEIN, SIMON L

License #: A020560

Business Location: BOCA RATON, FLORIDA

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Type Original Issue Date Qualifying Appointment

LIFE & HEALTH(0218) 4/23/2004 YES

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Types and Classes of Active Appointments

LIFE & HEALTH(0218)

Company Name Original Issue Date Exp Date Type County

1. JOHN HANCOCK LIFE INSURANCE COMPANY U.S.A. 12/8/2004 12/31/2014 STATE Palm Beach
2. BANNER LIFE INSURANCE COMPANY 6/1/2010 12/31/2014 STATE Palm Beach
3. ALLIANZ LIFE INSURANCE COMPANY OF NORTH AMERICA 4/7/2010 12/31/2014 STATE Palm Beach
4. AMERICAN GENERAL LIFE INSURANCE COMPANY 7/20/2004 12/31/2014 STATE Palm Beach
5. AMERICAN NATIONAL INSURANCE COMPANY 4/22/2010 12/31/2014 STATE Palm Beach
6. RELIASTAR LIFE INSURANCE COMPANY 6/23/2011 12/31/2013 STATE Palm Beach
7. SECURITY LIFE OF DENVER INSURANCE COMPANY 6/23/2011 12/31/2013 STATE Palm Beach
8. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all investment account records from, including but not limited to, Stanford, JP Morgan, Legacy Bank, Sabadell and Oppenheimer.
9. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all medical records of Simon from all doctors involved in care for the years 2000-2012.
10. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all medical records in the prior 16 weeks leading up to Simon’s death.
11. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all post mortem medical records, coroner records and hospital records for Simon.
12. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all records and documents relating to the following BUSINESS ENTITIES:
13. ALPS (Arbitrage Life Payment System)
14. Arbitrage International Holdings, LLC
15. Arbitrage International Management LLC
16. Arbitrage International Management LLC
17. Arbitrage International Marketing, Inc.
18. Arbitrage International Marketing, Inc.
19. Bernstein & Associates, Inc.
20. Bernstein Family Investments, LLLP dated May 20, 2008
21. Bernstein Holdings, LLC dated May 20, 2008.
22. Bernstein Family Realty LLC
23. Bernstein Simon and Shirley – A company in Boca Raton, FL.
24. Cambridge Associates Of Indiana, Inc.
25. Cambridge Companies
26. Cambridge Financing Company
27. LIC Holdings, Inc.
28. Life Insurance Concepts
29. Life Insurance Concepts Inc.
30. Life Insurance Concepts, LLC
31. Life Insurance Connection Inc.
32. Life Insurance Innovations, Inc.
33. National Service Association, Inc.
34. National Service Association, Inc.
35. National Service Corporation
36. National Service Corporation (Florida)
37. NSA, Inc.
38. S.T.P. Enterprises
39. SB Lexington. Inc.
40. S.B. Lexington Inc. Death Benefit Plan United Bank of Illinois NA. (ein 363479122)
41. Shirley Bernstein Family Foundation Inc. and Deborah Bernstein involvement
42. Simon and Shirley Bernstein (company or Foundation?)
43. Syracuse Partners Incorporated
44. Telenet Systems, Inc.
45. Telenet Systems, LLC
46. Total Brokerage Solutions LLC
47. TSB Holdings, LLC
48. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any Iviewit companies stock and patent interest holdings for the following companies and intellectual properties:
49. Iviewit Holdings, Inc. – DL
50. Iviewit Holdings, Inc. – DL (two identically named in Delaware)
51. Iviewit Holdings, Inc. – NY (three identically named)
52. Iviewit Holdings, Inc. – FL (four identically named)
53. Iviewit Technologies, Inc. – DL
54. Uviewit Holdings, Inc. – DL
55. Uview.com, Inc. – DL
56. Iviewit.com, Inc. – FL
57. Iviewit.com, Inc. – DL
58. I.C., Inc. – FL
59. Iviewit.com LLC – DL
60. Iviewit LLC – DL
61. Iviewit Corporation – FL
62. Iviewit, Inc. – FL
63. Iviewit, Inc. – DL
64. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all Attorney Fee Statements for ALL ATTORNEYS from beginning to current for both Simon and Shirley Estates and Trusts and Legal Fees for Stansbury Case for Simon and Shirley
65. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all Banking and Balances for all Estate Assets including Business Entities, Individually and TOD’S, POD’s and FBO’s
66. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all Investment Accounts for all Estate Assets including Business Entities, Individually and TOD’S, POD’s and FBO’s
67. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all accounting for Saint Andrews Club Membership required for 7020 Lions Head Lane.
68. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the Title for 2013 Kia Soul given as a birthday gift to Josh Bernstein from Simon Bernstein on August 26, 2012 as birthday gift.
69. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Claims filed in the Estates and all correspondences, including but not limited to;
70. William Stansbury,
71. Maritza Puccio,
72. Wells Fargo,
73. Dr. Ronick Seecharan,
74. Dr, Steven Rimer,
75. American Express, and,
76. Scott Banks – Telenet Systems.
77. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all corporate information regarding Telenet Systems, including but not limited to, correspondence and letters written to Scott Banks in regards to Telenet Systems and any business plans, agreements or any other record, including all financial transactions
78. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Accounting, Inventories and allocation of the tangible personal property of Shirley and Simon Bernstein, including but not limited to, Jewelry, Fine Art, Home furnishings, clothing, family pictures, contents of safety deposit boxes and safes, office documents, computers, hard drives and business contracts
79. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents relating to the life insurance policies owned by Shirley and Simon, insuring Shirley and/or Simon's life, or for the benefit of Shirley and/or Simon Bernstein;
80. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the allocation and division of all companies owned by Simon and/or Shirley at the time of their deaths and copies of any partnership, operating, or stockholders agreements and accountings
81. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the contents of the Condo at the Aragon in Boca Raton and who is in possession, all transactional details of any sale or transfers of property.
82. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to ALL attorney and other professional or fiduciary accountings and billings for Shirley and Simon Estates, including but not limited to; Alan Rose, Esq., John Pankauski, Esq., Donald Tescher, Esq., Robert Spallina, Esq., Benjamin Brown, Esq., Mark Manceri, Esq., Theodore Bernstein, Adam Simon, Esq., David B. Simon, Esq., John Stamos, Esq., Gerald R. Lewin, CPA and Peter Feaman, Esq.
83. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all homeowners insurance and any policies insuring any assets of the estates of SIMON and SHIRLEY.
84. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all information regarding the automobile of Simon Bernstein, a Porsche Panorama and records, lease papers, sale information, etc. Provide the name of any drivers of the vehicle and time and dates the vehicle has been used, mileage, etc. since Simon’s passing.
85. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Information regarding Post Mortem Red Light Ticket in Simon’s name leading to his DL being suspended.
86. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents which Tescher and Spallina P.A. (“T & S”) or its predecessor sent to or received from Simon/Shirley Bernstein (“Simon/Shirley”).
87. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all videotapes or audiotapes of Simon/Shirley.
88. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents which were signed by Simon/Shirley or which bear Simon/Shirley signatures.
89. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the entire estate file for Simon.
90. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all beneficiary designations documents, including life insurance policies, IRA’s and pension or profit sharing plan beneficiary designations, executed by Simon and/or Shirley.
91. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents which reflect or refer to any communication between any attorney or employee of Tescher & Spallina, or any attorney or other contracted by T & S or its predecessor and Simon/Shirley, including but not limited to the following: (a) any emails sent or received; (b) any time records or bills which reflect or refer to such communications; (c) any correspondence sent or received; (d) any handwritten notes or memoranda which reflect or refer to such communications; and (e) any calendar entries which reflect or refer to such communications.
92. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any documents which any attorney or employee of T&S or its predecessor received from a lawyer representing or claiming to represent Simon/Shirley in any capacity.
93. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Any medical records or reports, including any reports of any psychologists or psychiatrists relating to Simon/Shirley Bernstein.
94. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Any and all wills, drafts of wills and codicils to wills prepared by or for Simon/Shirley Bernstein.
95. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Any and all trust documents, drafts of trusts and trust amendments prepared by or for Simon.
96. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Any and all powers of attorney, designations of healthcare surrogates and living wills prepared by or for Simon Bernstein.
97. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications between or among Simon/Shirley Bernstein and their attorneys, accountants, financial advisors, or estate planning advisors from January 1, 1999 to September 13, 2012.
98. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications, including but not limited to emails, notes, letters, and postcards, between or among Simon/Shirley and any person(s) which discusses or refers to their testamentary intent, estate plan, or intent concerning the designation of beneficiaries for any property, assets, or accounts they owned, including but not limited to all assets that are includable in the Estates and Trusts.
99. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications, including but not limited to attorney notes, files, time sheets, and memoranda, which discuss or refer to Simon/Shirley’s testamentary intent, or intent concerning the designation of beneficiaries for any property, assets, or accounts they owned, including but not limited to all assets that are includable in the Estates and Trusts.
100. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications, including but not limited to handwritten or typewritten notes, correspondence, tape recordings, email, or memoranda, relating to, discussing or mentioning Simon/Shirley’s intent with regard to the disposition of their assets either upon death or during their lifetime.
101. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications between or among Simon/Shirley and any other person or entity from and after January 1, 1999, including but not limited to emails, notes, postcards, letters, faxes, and phone messages (whether written or recorded).
102. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all diaries, desk calendars, address books, telephone books, and notebooks kept by or for Simon/Shirley from and after January 1, 1999.
103. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications, including but not limited to records, reports, notes or correspondence from any and all doctors, nurses, hospitals, clinics, medical facilities or other care givers relating to Simon/Shirley mental or physical condition conditions from January 2008.
104. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all documents and communications relating to any medications purchased by or on the behalf of Simon/Shirley from and after January 2008, including but

not limited to all pharmacy records, prescriptions, and receipts.

Signed on Thursday, January 22, 2015.

Respectfully submitted,

By: ELIOT BERNSTEIN, individually and on behalf of his minor children

Petitioner (*pro se*)

2753 N.W. 34th St.

Boca Raton, Florida 33434-3459

 (561) 245.8588 (telephone)

 Email address: iviewit@iviewit.tv

**CERTIFICATE OF SERVICE**

 I hereby certify that a true and correct copy of the foregoing Petition was served via electronic mail on Thursday, January 22, 2015 to the parties listed in the attached Service List.

By: ELIOT BERNSTEIN, individually and on behalf of his minor children

Petitioner (*pro se*)

2753 N.W. 34th St.

Boca Raton, Florida 33434-3459

 (561) 245.8588 (telephone)

 Email address: iviewit@iviewit.tv

**EMAIL SERVICE LIST**

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| --- | --- | --- | --- |
| Theodore Stuart BernsteinLife Insurance Concepts950 Peninsula Corporate Circle, Suite 3010Boca Raton, Florida 33487tbernstein@lifeinsuranceconcepts.com | Alan B. Rose, Esq.Page, Mrachek, Fitzgerald & Rose, P.A.505 South Flagler Drive, Suite 600West Palm Beach, Florida 33401(561) 355-6991arose@pm-law.com  | John J. Pankauski, Esq.Pankauski Law Firm PLLC120 South Olive Avenue 7th Floor West Palm Beach, FL 33401(561) 514-0900courtfilings@pankauskilawfirm.com  | Carley & Max Friedstein, Minorsc/o Jeffrey and Lisa FriedsteinParents and Natural Guardians2142 Churchill LaneHighland Park, IL 6003Lisa@friedsteins.com lisa.friedstein@gmail.com  |
| Pamela Beth Simon950 N. Michigan AvenueApartment 2603Chicago, IL 60611psimon@stpcorp.com  | Irwin J. Block, Esq.The Law Office of Irwin J. Block PL700 South Federal HighwaySuite 200Boca Raton, Florida 33432ijb@ijblegal.com  | William M. Pearson, Esq.P.O. Box 1076Miami, FL 33149wpearsonlaw@bellsouth.net  | Robert L. Spallina, Esq., RESPONDENTTescher & Spallina, P.A.Boca Village Corporate Center I4855 Technology WaySuite 720Boca Raton, FL 33431rspallina@tescherspallina.com  |
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| Eric Bernstein2231 Bloods Grove CircleDelray Beach, FL 33445ebernstein@lifeinsuranceconcepts.com  | Michael Bernstein2231 Bloods Grove CircleDelray Beach, FL 33445mchl\_bernstein@yahoo.com  | Molly Simon1731 N. Old Pueblo DriveTucson, AZ 85745molly.simon1203@gmail.com  |  |
| Matt Logan2231 Bloods Grove CircleDelray Beach, FL 33445matl89@aol.com  | Joshua, Jacob and Daniel Bernstein, Minorsc/o Eliot and Candice Bernstein,Parents and Natural Guardians2753 NW 34th StreetBoca Raton, FL 33434 | Julia Iantoni, a Minorc/o Guy and Jill Iantoni,Her Parents and Natural Guardians210 I Magnolia LaneHighland Park, IL 60035jilliantoni@gmail.com |  |