

IN THE CIRCUIT COURT IN AND FOR THE 15<sup>TH</sup> JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

IN RE: ESTATE OF:

PROBATE DIVISION

SIMON L. BERNSTEIN,

FILE NO: 502012CP4391XXXXSB

Deceased.

**MOTION FOR INSTRUCTIONS AND/OR MOTION TO COMPEL COMPLIANCE  
WITH COURT'S ORDER DATED SEPTEMBER 18, 2014; MOTION TO EXTEND  
TIME**

BRIAN M. O'CONNELL, as Successor Personal Representative of the Estate of Simon L. Bernstein, hereby files this Motion for Instructions and/or Motion to Compel Compliance with Court's Order dated September 18, 2014; Motion to Extend Time, regarding the "First Request for Production of Documents and Things Propounded on Brian O'Connell, Esq." ("RTP" and "O'Connell," respectively) served by Eliot Bernstein on January 22, 2015, and states as follows:

1. On September 18, 2014, the Court entered "Case Management Order and Requirements for Filing New Claims" ("Order"). A copy of the Order is attached hereto as Exhibit "A".

2. On January 22, 2015, Eliot Bernstein propounded a RTP on O'Connell which consists of 143 requested items, plus sub-requests. See RTP attached hereto as Exhibit "B."

3. The Order requires that before "any adversary proceeding, which is anything other than the ordinary administration of the estate or trust," is to be filed the filing party has to set a hearing before the Court, must bring the prepared pleading, unfiled with the clerk, before the Court, and the Court will determine whether it is going to be allowed to be filed with the clerk.


4. O'Connell requests this Court's instructions on whether the filing and service of the RTP, which contains 143 requests plus sub-requests, constitutes something "other than the ordinary administration of the estate or trust" and is an "adversary proceeding" governed by the Order such that the above procedures should have been employed prior to the filing of same.

5. If the Court finds the RTP is governed by the Order, O'Connell requests this Court to compel compliance with the Order, to strike the RTP, and to enter an order that O'Connell shall not respond to the RTP as filed on January 22, 2015.

6. If the Court finds that the RTP is not governed by the Order, then O'Connell requests an extension of time to respond to the RTP of twenty (20) days after this Court enters an order on this Motion.

WHEREFORE, BRIAN M. O'CONNELL, as Successor Personal Representative of the Estate of Simon L. Bernstein, respectfully files this Motion for Instructions and/or Motion to Compel Compliance with Court's Order dated September 19, 2014; Motion to Extend Time seeking the relief sought in either paragraph 5 or 6, above, and requests attorneys' fees and costs and any other relief deemed just or proper.

I HEREBY CERTIFY that a true and correct of the foregoing was sent by e-mail service or U.S. Postal Service on the 23<sup>rd</sup> day of February, 2015 to the parties on the attached Service List.



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BRIAN M. O'CONNELL  
Florida Bar No: 308471  
ASHLEY N. CRISPIN  
Florida Bar No: 37495  
JOIELLE A. FOGLIETTA  
Florida Bar No: 94238

In Re: Estate of Simon L. Bernstein  
File No: 502012CP004391XXXXSB

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Ciklin Lubitz Martens & O'Connell  
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<p>Peter Feaman, Esq. Peter M. Feaman, P.A. 3695 Boynton Beach Blvd., Suite 9 Boynton Beach, FL 33436 <a href="mailto:pfeaman@feamanlaw.com">pfeaman@feamanlaw.com</a></p>	<p>Shendell &amp; Pollock, P.L. 2700 N. Military Trail, suite 150 Boca Raton, FL 33431 241-2323 Fax: 241-2330 Gary R. Shendell, Esq. <a href="mailto:gary@shendellpollock.com">gary@shendellpollock.com</a> <a href="mailto:estella@shendellpollock.com">estella@shendellpollock.com</a> <a href="mailto:grs@shendellpollock.com">grs@shendellpollock.com</a> Kenneth S. Pollock, Esq. <a href="mailto:ken@shendellpollock.com">ken@shendellpollock.com</a> <a href="mailto:britt@shendellpollock.com">britt@shendellpollock.com</a> <a href="mailto:grs@shendellpollock.com">grs@shendellpollock.com</a>  Attorney for Tescher and Spallina</p>	<p>Max Friedstein 2142 Churchill Lane Highland Park, IL 60035 Beneficiary</p>
<p>Eliot Bernstein and Joshua, Jacob and Daniel Bernstein, Minors c/o Eliot and Candice Bernstein, Parents and Natural Guardians 2753 N.W. 34<sup>th</sup> St. Boca Raton, FL 33434 <a href="mailto:iviewit@iviewit.tv">iviewit@iviewit.tv</a></p>	<p>Pamela Beth Simon 950 N. Michigan Ave., Apt. 2603 Chicago, IL 60611 <a href="mailto:psimon@stpcorp.com">psimon@stpcorp.com</a></p>	<p>Lisa Friedstein and Carley Friedstein, Minor c/o Jeffrey and Lisa Friedstein Parent and Natural Guardian 2142 Churchill Lane Highland Park, IL 60035 <a href="mailto:Lisa@friedsteins.com">Lisa@friedsteins.com</a> <a href="mailto:Lisa.friedstein@gmail.com">Lisa.friedstein@gmail.com</a> Beneficiary</p>
<p>Jill Iantoni and Julia Iantoni, a Minor c/o Guy and Jill Iantoni, her Parents &amp; Natural Guardians 2101 Magnolia Lane Highland Park, IL 60035 <a href="mailto:jilliantoni@gmail.com">jilliantoni@gmail.com</a></p>		<p>Benjamin P. Brown, Esq. Matwiczuk &amp; Brown LLP 625 N. Flagler Dr., #401 West Palm Beach, FL 33401 <a href="mailto:bbrown@matbrolaw.com">bbrown@matbrolaw.com</a></p>

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

CASE NO. 502012CP004391XXXXSB  
CP - Probate

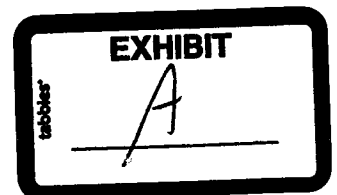
IN RE:

ESTATE OF SIMON L. BERNSTEIN,  
\_\_\_\_\_ /

**CASE MANAGEMENT ORDER AND REQUIREMENTS**  
**FOR FILING OF NEW CLAIMS**

THIS CAUSE came before the Court on its own initiative on September 15, 2014, at a hearing set on other matters involving these parties. The Court, having reviewed the record and having noted the voluminous number of filings and the size of various filings made in this case, hereby enters the following Order under Rule 5.025 of the Florida Rules of Probate Procedure which shall apply to and govern all estate or trust cases involving Simon or Shirley Bernstein.

1. From this point forward, if any party desires to file an adversary proceeding, which is anything other than the ordinary administration of the estate or the trust, they must do the following. First, the filing party has to set a hearing before the Court. The filing party can prepare the purported pleading but must bring the pleading, unfiled with the clerk, before the Court, and the Court will determine whether it is going to be allowed to be filed with the clerk, and start the process under the rule as an adversary proceeding. That is under Rule 5.025, but the court is modifying the rule because the proposed pleading may not be served in clerk's office because the clerk is getting bombarded here unnecessarily. The Court will look at the lawsuit and see how it is styled, and then



the Court will determine whether it meets the rules for an adversary proceeding by the petitioner versus the respondent in the particular case.

2. Second, the Court directs the parties to comply with Probate Rule 5.020, which provides: "When you plead something, the pleading, called the petition, shall contain a short and plain statement of the relief sought, short statement of the grounds, and short statement of the jurisdiction of the court." The Court also directs the parties avoid filing voluminous exhibits attached to petitions or motions.

3. The Court orders that all filings now pending shall be brought before the Court. The parties are directed not to file anything new in the way of lawsuits, petitions, counterpetitions, adversary proceedings without first bringing them in to the Court unfiled for the Court to review. To the extent anyone involved in this proceeding intends to file a new petition or claim for relief, such party shall first follow the dictates of this Order.

4. If the Court determines that the filing is appropriate, the Court will grant permission and the document thereafter may be filed with the Clerk of Court. Any document filed without compliance with this Order shall be stricken from the record.

DONE AND ORDERED in Chambers, in Palm Beach County, Florida, \_\_\_\_\_ day of August, 2014.

\_\_\_\_\_  
Martin H. Colin  
CIRCUIT COURT JUDGE

cc: All parties on the attached service list

## SERVICE LIST

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Eric Bernstein, Michael Bernstein

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

IN RE: THE ESTATE OF  
SIMON BERNSTEIN,  
Deceased

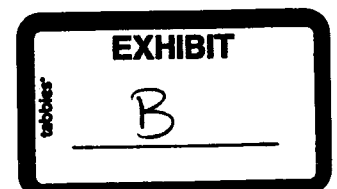
CASE NO. 502012CP004391XXXXSB

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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**ELIOT BERNSTEIN'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS PROPOUNDED ON BRIAN O'CONNELL, ESQ.**

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 Brian 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 34<sup>th</sup> 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.

PLEASE TAKE NOTICE that the term documents as used herein includes: writings, electronic mail transmissions, drawings, graphs, charts, photographs, audio recording, and other data compilations from which information can be obtained or translated, if necessary, by the person to whom this request is directed through the detection devices into reasonably usable form. It only includes those items which are or were ever in your possession. You are not required to collect or create such items as you never had possession of.

Thursday, January 22, 2015

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FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

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PLEASE TAKE FURTHER NOTICE that if any of the requested items, documents or properties, have been lost or destroyed, then you are required to deliver to the undersigned a written description sufficient to identify them, together with statements of whether they have been lost, sold or destroyed, and the approximate date of such loss, sale or destruction, as the case may be.

PLEASE TAKE FURTHER NOTICE that if any of the said items are in the possession or control of any person other than yourself, then you are required to deliver to the undersigned a written description sufficient to identify them, together with the names and address of the person who have custody or control of them. You are hereby requested to produce the following:

#### DEFINITIONS

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

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

Thursday, January 22, 2015  
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FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

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

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

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

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

As used in this Request to Produce, the term “Trust” shall refer to any of the TRUSTS OF SIMON BERNSTEIN.

#### REQUESTS FOR PRODUCTION INFORMATION FOR FINAL ACCOUNTING

1. 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. 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.



Thursday, January 22, 2015  
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3. 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.
4. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any prior accountings.
5. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to tax returns for 2009-present.
  - a. Federal & State
    - i. Estate & Trust.
    - ii. Personal and Business.
6. 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.
  - b. Federal & State
    - i. Estate & Trust.
    - ii. Personal and Business.
7. 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.
8. 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.
9. 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.
10. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Monarch Life Proceeds checks or other information.
11. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the copy of the US Treasury (tax refund).
12. 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.
  - a. 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?
13. 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

Thursday, January 22, 2015

Page 5 of 24

FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

- any predecessor or successor accounts. Produce IRA account statements for 2009-2015 for Simon and 2005-2010 for Shirley Bernstein's IRA.
14. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to backup documentation of the Sabadell account (ending 7176).
    - a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to account statements for 2009-2015.
  15. 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.
    - a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to account statements for 2009-2014.
  16. 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.
    - a. 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.
    - b. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all retainer agreements for Tescher & Spallina, P.A.
  17. 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.
    - a. 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.
  18. 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.
  19. 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").
    - a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any loans to BFR.
  20. 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?
  21. 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.
    - a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the cancelled check listed.

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Page 6 of 24

FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

- b. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to loan documentation listed.
- 22. 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.
  - a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the cancelled checks, statements, etc.
  - b. 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

- 23. 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."
- 24. 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.
  - a. 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.
  - b. 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.
- 25. 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.
- 26. 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.
- 27. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to a copy of the Jewelry Appraisal.
  - a. 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

- 28. 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).
  - a. 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

Thursday, January 22, 2015  
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FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

29. 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.
30. 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).
  - a. 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.
  - b. 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.
  - c. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to legal fee billings and details.
31. 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

32. 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.
33. 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.
34. 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.
  - a. 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.
  - b. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of Tescher & Spallina retainer with BFR.
35. 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.
  - a. 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.
  - b. 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.

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FIRST REQUEST FOR PRODUCTION...ON PERSONAL REPRESENTATIVE BRIAN O'CONNELL, ESQ.

36. 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.
- a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to copies of the \$50000 distribution check.
  - b. 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

37. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to furniture appraisal for Boca Home St. Andrews?
- a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any items went.
38. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to furniture appraisal for Boca Condo?
- a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any items went.
39. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Jewelry appraisals.
- a. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of Jewelry.
40. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to accounting of where any jewelry went.
41. 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?
42. 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.
43. 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.
44. 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."
45. 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.

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46. 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).
47. 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).
48. 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.
49. 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**

50. 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.
51. 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.
52. Please provide a time to inspect all physical evidence in your possession.
53. 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.
54. 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.
55. 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.
56. 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.

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57. 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.
58. Please produce all Simon Bernstein US Postal mail or any other mail service collected by the Estate since 2012.
59. 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.
60. 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.
61. 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.
62. 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).
63. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any IRA or other qualified plan accounts.
64. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any federal or state tax returns.
65. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any Mortgages and/or Lines of Credit
66. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any insurance loans, withdrawals, etc.
67. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any pension /profit sharing plans.
68. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to any Stanford Lawsuit Interests of decedent.
69. 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.
70. 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.
71. 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:

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1. 09/630,939 System & Method for Providing an Enhanced Digital Image File
2. PCT/US00/21211 System & Method for Providing an Enhanced Digital Image File
3. 75/725,802 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
4. 09/630,939 System & Method for Providing an Enhanced Digital Image File
5. PCT/US00/15602 System & Method for Video Playback Over a Network
6. 75/725,805 IVIEWIT "YOUR THIRD EYE TO THE WORLD" June 8, 1999 FILED July 27, 2004
7. 09/630,939 System & Method for Providing an Enhanced Digital Image File
8. PCT/US00/15406 System & Method for Playing a Digital Video File
9. 15406 Part 1 Attachment
10. 15406 Part 2 Attachment
11. 15406 Part 3 Attachment
12. 75/725,806 IVIEWIT "YOUR THIRD EYE TO THE WORLD" June 8, 1999 FILED July 27, 2004
13. 09/522,721 Apparatus & Method for Producing Enhanced Digital Images
14. PCT US00/15408 System & Method for Streaming an Enhanced Digital Video File
15. 75/725,807 IVIEWIT "YOUR THIRD EYE TO THE WORLD" (THIS MARK IS MISSING PROPER QUOTES June 8, 1999 FILED July 27, 2004
16. 09/587,734 System & Method for Providing an Enhanced Digital Video File
17. PCT/US00/15405 System & Method for Providing an Enhanced Digital Video File
18. 75/725,808 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
19. 09/587,734 System & Method for Providing an Enhanced Digital Video File
20. PCT US00/07772 Apparatus & Method for Producing Enhanced Digital Images
21. 75/725,809 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
22. 09/587,026 System & Method for Playing a Digital Video File
23. EPO 00938126.0 System & Method for Streaming an Enhanced Digital Video File
24. 75/725,810 IVIEWIT "YOUR THIRD EYE TO THE WORLD June 8, 1999 FILED July 27, 2004
25. 09/587,730 System & Method for Streaming an Enhanced Digital Video File
26. EPO 00944619.6 System & Method for Streaming an Enhanced Digital Video File
27. 75/725,816 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
28. 60/223,344 Zoom & Pan Using a Digital Camera
29. EPO 00955352.0 System & Method for Providing an Enhanced Digital Image File
30. 75/725,816 IVIEWIT June 8, 1999 FILED July 27, 2004
31. 60/233,341 Zoom & Pan Imaging Design Tool
32. Japan 2001 502364 System & Method for Streaming an Enhanced Digital Video File
33. 75/725,817 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
34. 60,169,559 Apparatus and Method for Producing Enhanced Video Images and/or Video Files
35. Japan 2001 502362 System & Method for Streaming an Enhanced Digital Video File
36. 75/725,817 IVIEWIT June 8, 1999 FILED July 27, 2004

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37. 60/155,404 Apparatus & Method for Producing Enhanced Video Images and/or Video Files
38. Japan 2001 514379 System & Method for Providing an Enhanced Digital Image File
39. 75/725,818 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
40. 60/149,737 Apparatus and Method for Producing Enhanced Digital Images and/or Digital Video Files
41. Korea PCT US00 15408
42. 75/725,819 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
43. 60/146,726 Apparatus & Method for Producing Enhanced Digital Images
44. 75/725,819 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
45. 60/141,440 Apparatus & Method for Providing and/or transmitting Video Data and/or Information in a Communication Network
46. 75/725,820 IVIEWIT.COM June 8, 1999 FILED July 27, 2004
47. 60/137,921 Apparatus & Method for Playing Video Files Across the Internet
48. 75/725,821 IVIEWIT June 8, 1999 FILED July 27, 2004
49. 60/137,297 Apparatus & Method for Producing Enhanced Video Images
50. 75/725,821 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
51. 60/125,824 Apparatus & Method for Producing Enhanced Digital Images
52. 75/725,822 IVIEWIT June 8, 1999 FILED July 27, 2004
53. 75/725,823 IVIEWIT June 8, 1999 FILED July 27, 2004
54. 75/725,823 THE CLICK HEARD 'ROUND THE WORLD June 8, 1999 FILED July 27, 2004
55. 76/037,700 IVIEWIT.COM May 1, 2000 FILED July 27, 2004
56. 76/037,701 A SITE FOR SORE EYES May 1, 2000 FILED July 27, 2004
57. 76/037,702 A SITE FOR SORE EYES May 1, 2000 FILED July 27, 2004
58. 76/037,703 IVIEWIT May 1, 2000 FILED July 27, 2004
59. 76/037,843 IVIEWIT LOGO May 1, 2000 FILED July 27, 2004
60. 76/037,844 May 1, 2000 FILED July 27, 2004

72. 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.
73. 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.
74. 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.

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75. 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.
76. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the May 20, 2008 Simon Bernstein Trust.
77. 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.
78. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to 1995 Simon Bernstein Irrevocable Insurance Trust.
79. 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.
80. 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.
81. 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.
82. 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.
83. 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.
84. 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.
85. 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.
86. 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

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87. 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.
88. 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.
89. 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.
90. 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.
91. 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.
92. 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.
93. 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.
94. 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.
95. 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.
96. 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.
97. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Exempt Property Petition filed.
98. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to Limited Power of Appointment executed by Simon.
99. 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 Sahn.

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100. 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.
101. 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.
102. 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.
103. 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)

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Company Name	Original Issue Date	Exp Date	Type	County
1. JOHN HANCOCK LIFE INSURANCE COMPANY U.S.A. STATE Palm Beach	12/8/2004	12/31/2014		
2. BANNER LIFE INSURANCE COMPANY Palm Beach	6/1/2010	12/31/2014	STATE	
3. ALLIANZ LIFE INSURANCE COMPANY OF NORTH AMERICA 12/31/2014 STATE Palm Beach	4/7/2010			
4. AMERICAN GENERAL LIFE INSURANCE COMPANY STATE Palm Beach	7/20/2004	12/31/2014		

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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

104. 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.
105. 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.
106. 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.
107. 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.
108. 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:

1. ALPS (Arbitrage Life Payment System)
2. Arbitrage International Holdings, LLC
3. Arbitrage International Management LLC
4. Arbitrage International Management LLC
5. Arbitrage International Marketing, Inc.
6. Arbitrage International Marketing, Inc.
7. Bernstein & Associates, Inc.
8. Bernstein Family Investments, LLLP dated May 20, 2008
9. Bernstein Holdings, LLC dated May 20, 2008.
10. Bernstein Family Realty LLC
11. Bernstein Simon and Shirley – A company in Boca Raton, FL.
12. Cambridge Associates Of Indiana, Inc.
13. Cambridge Companies
14. Cambridge Financing Company
15. LIC Holdings, Inc.
16. Life Insurance Concepts
17. Life Insurance Concepts Inc.
18. Life Insurance Concepts, LLC
19. Life Insurance Connection Inc.
20. Life Insurance Innovations, Inc.
21. National Service Association, Inc.

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22. National Service Association, Inc.
23. National Service Corporation
24. National Service Corporation (Florida)
25. NSA, Inc.
26. S.T.P. Enterprises
27. SB Lexington, Inc.
28. S.B. Lexington Inc. Death Benefit Plan United Bank of Illinois NA. (ein 363479122)
29. Shirley Bernstein Family Foundation Inc. and Deborah Bernstein involvement
30. Simon and Shirley Bernstein (company or Foundation?)
31. Syracuse Partners Incorporated
32. Telenet Systems, Inc.
33. Telenet Systems, LLC
34. Total Brokerage Solutions LLC
35. TSB Holdings, LLC

109. 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:

1. Iviewit Holdings, Inc. – DL
2. Iviewit Holdings, Inc. – DL (two identically named in Delaware)
3. Iviewit Holdings, Inc. – NY (three identically named)
4. Iviewit Holdings, Inc. – FL (four identically named)
5. Iviewit Technologies, Inc. – DL
6. Uviewit Holdings, Inc. – DL
7. Uview.com, Inc. – DL
8. Iviewit.com, Inc. – FL
9. Iviewit.com, Inc. – DL
10. I.C., Inc. – FL
11. Iviewit.com LLC – DL
12. Iviewit LLC – DL
13. Iviewit Corporation – FL
14. Iviewit, Inc. – FL
15. Iviewit, Inc. – DL

110. 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

111. 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

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112. 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
113. 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.
114. 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.
115. 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;

1. William Stansbury,
2. Maritza Puccio,
3. Wells Fargo,
4. Dr. Ronick Seecharan,
5. Dr, Steven Rimer,
6. American Express, and,
7. Scott Banks – Telenet Systems.

116. 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
117. 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
118. 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;
119. 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

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120. 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.
121. 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.
122. 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.
123. 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.
124. 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.
125. 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").
126. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to all videotapes or audiotapes of Simon/Shirley.
127. 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.
128. Please produce all documents, all physical evidence, tangible things and property that evidence or relate to the entire estate file for Simon.
129. 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.
130. 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

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reflect or refer to such communications; and (e) any calendar entries which reflect or refer to such communications.

131. 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.
132. 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.
133. 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.
134. 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.
135. 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.
136. 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.
137. 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.
138. 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.
139. 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.

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140. 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).
141. 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.
142. 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.
143. 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*))

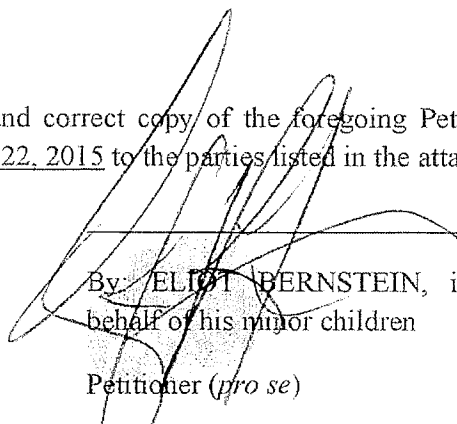
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Boca Raton, Florida 33434-3459  
(561) 245.8588 (telephone)  
Email address: [iviewit@iviewit.tv](mailto:iviewit@iviewit.tv)

**CERTIFICATE OF SERVICE**

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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.  
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**EMAIL SERVICE LIST**

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<p>Lisa Friedstein 2142 Churchill Lane Highland Park, IL 60035 <a href="mailto:Lisa@friedsteins.com">Lisa@friedsteins.com</a> <a href="mailto:lisa.friedstein@gmail.com">lisa.friedstein@gmail.com</a></p>	<p>William H. Glasko, Esq. Golden Cowan, P.A. 1734 South Dixie Highway Palmetto Bay, FL 33157 <a href="mailto:bill@palmettobaylaw.com">bill@palmettobaylaw.com</a></p>	<p>Alexandra Bernstein 3000 Washington Blvd, Apt 424 Arlington, VA, 22201 <a href="mailto:alb07c@gmail.com">alb07c@gmail.com</a></p>	<p>Mark R. Manceri, Esq., RESPONDENT and Mark R. Manceri, P.A., RESPONDENT 2929 East Commercial</p>

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Matt Logan 2231 Bloods Grove Circle Delray Beach, FL 33445 <a href="mailto:matt189@aol.com">matt189@aol.com</a>	Joshua, Jacob and Daniel Bernstein, Minors c/o Eliot and Candice Bernstein, Parents and Natural Guardians 2753 NW 34th Street Boca Raton, FL 33434	Julia Iantoni, a Minor c/o Guy and Jill Iantoni, Her Parents and Natural Guardians 210 I Magnolia Lane Highland Park, IL 60035 <a href="mailto:jilliantoni@gmail.com">jilliantoni@gmail.com</a>	

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