

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

CASE NO. 502012CP004391XXXXNBIH
CP - Probate

IN RE:

ESTATE OF SIMON L. BERNSTEIN,

_____ /

**TED S. BERNSTEIN, SUCCESSOR TRUSTEE'S, OBJECTION TO
PERSONAL REPRESENTATIVE'S NOTICE AND
AMENDED NOTICE OF SERVICE OF SUBPOENAS UNDER RULE 1.351**

Ted S. Bernstein, Successor Trustee of the Simon L. Bernstein Amended and Restated Trust, serves his objections to the Notice of Intent Pursuant to Rule 1.351, served June 10, 2015 by email, and the Amended Notice of Intent Pursuant to Rule 1.351, served June 11, 2015 by email, proposing to serve Subpoenas on 17 insurance companies, served by Personal Representative, and states:

1. Ted S. Bernstein, as Trustee of the Trust which is the sole beneficiary of this estate, objects to the service of subpoenas as proposed by the Personal Representative. These subpoenas seek documents which are not relevant nor reasonably calculated to lead to the discovery of evidence admissible or useable by the Personal Representative.

2. Given the limited assets remaining available for distribution to the beneficiaries, Bernstein objects to the personal representative's use of estate assets to conduct this discovery which not only lacks relevancy, may be helpful to the claimant William Stansbury. To date, despite reasonable request, the Personal Representative has refused to explain the basis for the serving of these subpoenas, the potential relevancy of the information, or the impetus for this undertaking.

3. Moreover, the information sought, if relevant, would be available to the Personal Representative in a manner which would retain confidentiality, at far less expense and in a far more efficient manner than serving numerous subpoenas on out-of-state entities.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been furnished to parties listed on attached Service List by: Facsimile **and** U.S. Mail; U.S. Mail; E-mail Electronic Transmission; FedEx; Hand Delivery this 26th day of June, 2015.

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By: /s/ Alan B. Rose
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SERVICE LIST - CASE NO. 502012CP004391XXXXNBIJH

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