

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

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

PROBATE DIVISION  
CASE NO.: 502014CP003698XXXXNB  
DIVISION: IH

v.

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

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**RESPONSE AND OBJECTIONS TO SUBPOENA DUCES TECUM FOR DEPOSITION**

COMES NOW William Stansbury, by and through his undersigned counsel, and files this  
his response and objections to the Subpoena Duces Tecum served upon him through counsel on  
March 10, 2016, as follows:

1. None
2. One email.
3. None
4. One email.

5. None
6. None
7. None
8. None
9. Objection as an invasion of privacy, overly broad and not relevant to the subject matter of this proceeding. None.
10. Objection based upon invasion of privacy, and not relevant to the subject matter of this proceeding. None.
11. None
12. Objection based upon invasion of privacy, and not relevant to the subject matter of this proceeding. None.
13. None.



Peter M. Feaman

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served in the Florida Courts E-Filing Portal to all parties on the service list below this 16 day of March, 2016:

**Eliot Bernstein, individually and Eliot and Candice Bernstein, as Parents and Natural Guardians of D.B., Ja.B. and Jo.B., Minors**  
2753 Northwest 34<sup>th</sup> Street  
Boca Raton, Florida 33434  
Email: [iviewit@iviewit.tv](mailto:iviewit@iviewit.tv)

**John P. Morrissey, Esq.**  
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West Palm Beach, Florida 33401  
Email: [john@jmorrisseylaw.com](mailto:john@jmorrisseylaw.com)  
*Counsel for Molly Simon, Alexandra Bernstein, Eric Bernstein, Michael Bernstein*

**Alan Rose, Esquire**  
Mrachek, Fitzgerald, Rose, Konopka, Thomas & Weiss, P.A.  
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**Pamela Beth Simon**  
303 East Wacker Drive, Suite 2725  
Chicago, Illinois 60601  
Email: [psimon@stpcorp.com](mailto:psimon@stpcorp.com)

**Lisa Friedstein, individually and as trustee for her children, and as natural guardian for M.F. and C.F., Minors; and Max Friedstein**

Email: [lisa.friedstein@gmail.com](mailto:lisa.friedstein@gmail.com)

**Brian M. O'Connell, Esquire**

**Joielle A. Foglietta, Esq.**

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**Jill Iantoni, individually and as trustee for her children, and as natural guardian for J.I. a minor**

Email: [jilliantoni@gmail.com](mailto:jilliantoni@gmail.com)

PETER M. FEAMAN, P.A.

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Boynton Beach, FL 33436

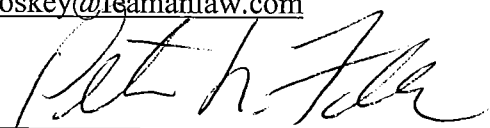
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By: \_\_\_\_\_

  
Peter M. Feaman

Florida Bar No. 0260347