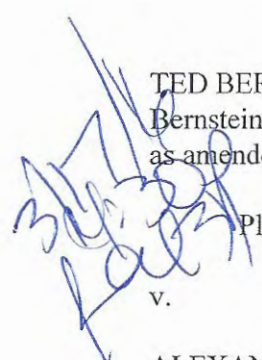


IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

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

Plaintiff,

v.

Probate Division

Case No.: 502014CP003698XXXXNBIJ

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

Defendants.

**SUBPOENA DUCES TECUM TO ELIOT BERNSTEIN FOR
APPEARANCE AT EVIDENTIARY HEARING/TRIAL**

THE STATE OF FLORIDA

TO: Eliot Bernstein
2753 NW 34th Street
Boca Raton, FL 33434

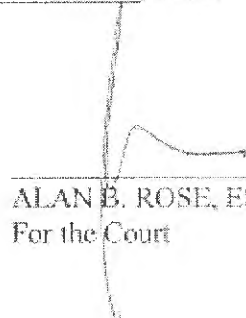
YOU ARE COMMANDED to appear before the Honorable John L. Phillips, Judge of the
Circuit Court, at the North Branch of the Palm Beach County Courthouse, 3188 PGA Boulevard,
Palm Beach Gardens, FL 33410 *Courtroom 3* on **April 8, 2016 at 9:45 A.M.** to testify in this action

and to have with you at that time, the documents outlined in Exhibit A attached to this Subpoena.

If you fail to appear, you may be in contempt of court.

You are subpoenaed to appear by the following attorneys and unless excused from this subpoena by these attorneys or the Court, you shall respond to this subpoena as directed.

DATED this 9th day of March, 2016.


ALAN B. ROSE, ESQ.
For the Court

MRACHEK, FITZGERALD, ROSE,
KONOPKA, THOMAS & WEISS, P.A.
505 S. Flagler Drive, Suite 600
West Palm Beach, FL 33401
Phone: 561-655-2250
Fax: 561-655-5537
Attorneys for Plaintiff, Ted Bernstein
Alan B. Rose
Florida Bar Number: 961825

EXHIBIT A

YOU ARE REQUESTED to bring the following documents:

Definitions

"Documents" shall mean and include all writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations, specifically including all letters, emails, text messages, phone messages, notes, deed, title reports, or written communication of any kind—stored in any medium whether in paper or electronic format.

"Property" shall mean 7020 Lions Head Lane, Boca Raton, Florida 33496.

"Eliot" shall mean Eliot Ivan Bernstein, including any agents, employees or others acting on his behalf.

"Stansbury" shall mean William Elwood "Bill" Stansbury, together with his wife Eileen E. Stansbury and any and all agents, employees or others acting on his behalf, including his attorney, Peter M. Feaman, Esquire, or anyone employed by or affiliated with the Law Offices of Peter M. Feaman. (This request does not seek any documents sent solely between William Stansbury and his counsel, and includes only documents which were sent to or received from a third-party outside of the attorney-client relationship.)

"Hall" shall mean Kevin R. Hall.

"Cox" shall mean Crystal Cox.

Documents Requested

1. All documents sent by Eliot to Stansbury, Hall or Cox concerning the Property.
2. All documents received by Eliot from Stansbury, Hall or Cox concerning the Property.
3. All documents sent by Eliot to anyone else other than Stansbury, Hall or Cox, relating to the Property.
4. All documents received by Eliot from anyone else other than Stansbury, Hall or Cox, relating to the Property.

5. All documents sent by Eliot to Cox, Hallor Stansbury, from and after May 6, 2015.
6. All documents, including checks, canceled checks, credit card receipts or other documents showing any payments made by Stansbury to or on behalf of Eliot or his family, from and after May 6, 2015 to the present.
7. All documents evidencing any oral or written agreements between Stansbury and Eliot concerning (i) the Property; (ii) the Trusts or Estates of Simon Bernstein and/or Shirley Bernstein, (iii) the Illinois litigation; or (iv) any other subject matter.
8. All documents relating to the Property, including any internet research, title reports, deeds, notes, pictures, or otherwise in the possession of Stansbury relating to the Property.
9. All documents concerning Lions Head Land Trust, Lions Head Land Trust, Inc., Mitchell and Deborah Huhern, Leilani Ochoada, Larry Pino, and anyone else involved in any way as an owner, participant, professional, lawyer, title examiner, etc. in the real estate transaction under which title of the Property transferred from the Shirley Bernstein Trust to the Lions Head Land Trust.