

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE
COUNTY, FLORIDA

FAMILY DIVISION
CASE NO.: 08-16475 FC 16

IN RE: THE MARRIAGE OF
CYNTHIA A. RODRIGUEZ

Petitioner/Wife,
vs.

ALEXANDER E. RODRIGUEZ,

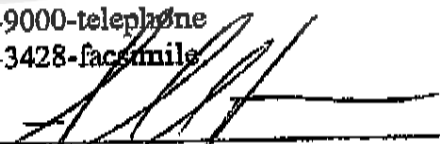
Respondent/Husband

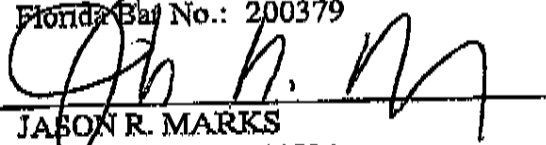
NOTICE OF APPEARANCE

NOTICE IS HEREBY GIVEN that the Law Firm of **KLUGER, PERETZ, KAPLAN & BERLIN, P.L.**, hereby enters its appearance as counsel on behalf of Respondent/Husband, **ALEXANDER E. RODRIGUEZ** in the above matter, and requests that all communications, whether written or oral, be made directly with the office of the undersigned counsel.

Dated this 9th day of July, 2008.

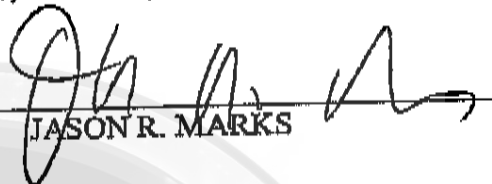
KLUGER, PERETZ, KAPLAN & BERLIN, P.L.
Counsel for Respondent/Husband
1700 Miami Center
201 South Biscayne Blvd.
Miami, Florida 33131
(305) 379-9000-telephone
(305) 379-3428-facsimile

BY: 
ALAN J. KLUGER
Florida Bar No.: 200379

BY: 
JASON R. MARKS
Florida Bar No.: 144584

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the forgoing was sent via facsimile and U.S. Mail this 8th day of July to: **Maurice Jay Kutner, Kutner and Associates, 11th Floor-Courthouse Tower, 44 West Flagler Street, Miami, Florida 33130-1808 and Earle S. Lilly, Esq., Lilly Law Office, 4544 Post Oak Place, Suite 380, Houston, TX 77027,**



JASON R. MARKS



IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

FAMILY DIVISION

CASE NO. 08-16475 FC-16

IN RE: THE MARRIAGE OF *
CYNTHIA A. RODRIGUEZ, *
Petitioner-Wife, *
and *
ALEXANDER E. RODRIGUEZ, *
Respondent-Husband. *

**WIFE'S NOTICE OF
SERVICE OF STANDARD
FAMILY LAW INTERROGATORIES**

WOLFF
2008 JUL -9 PM 12:14
FAMILY DIVISION

The Wife, Cynthia A. Rodriguez, serves the attached interrogatories on the Husband, to be answered in writing, under oath, within 30 days of the date of service, in accordance with Rule 12.340, *Florida Family Law Rules of Procedure*.

The Wife also requests that the Husband file a Long Form Financial Affidavit.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the Wife's Notice of Service of Standard Family Law Interrogatories and an original and one set of copies of the Interrogatories were hand-

*Pursuant to Rule 12.280(a), *Florida Family Law Rules of Procedure*, parties to family law matters have a continuing duty to amend or otherwise update discovery responses.

[Rodriguez vs. Rodriguez, Case No. 08-16478 FC-18]

delivered to IRA M. ELEGANT, ESQUIRE, Buchbinder & Elegant, P.A., Commonwealth Building - 4th Floor, 46 S.W. 1st Street, Miami, Florida 33130, this 7th day of July, 2008.

LILLY LAW OFFICE
4544 Post Oak Place - Suite 380
Houston, Texas 77027
Phone: (713) 966-4444
Fax: (713) 966-4466

KUTNER AND ASSOCIATES
11th Floor - Courthouse Tower
44 West Flagler Street
Miami, Florida 33130-1808
Phone: (305) 377-9411
Fax: (305) 377-4758

By: *Earle S. Lilly*
EARLE S. LILLY
Texas Bar No.: 12356000

By: *Maurice Jay Kutner*
MAURICE JAY KUTNER
Florida Bar No.: 44775

and

and

By: *John E. Van Ness*
JOHN E. VAN NESS
Texas Bar No.: 00792890

By: *Anthony P. Sabatino*
ANTHONY P. SABATINO
Florida Bar No.: 185809

/lad

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT, IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

FAMILY DIVISION

CASE NO. 08-16475 FC 16

FILED FOR COURT
08 JUL -9 AM 11:06
CLERK OF DISTRICT COURT
MIAMI-DADE COUNTY, FL
CIVIL #73
Willie Wilson
JUL 10 2008

IN RE: The Marriage of
CYNTHIA A. RODRIGUEZ,

Petitioner/Wife,

and

ALEXANDER E. RODRIGUEZ,

Respondent/Husband.

NOTICE OF APPEARANCE

NOTICE IS HEREBY GIVEN that the law firm of Buchbinder & Elegant, P.A. files its appearance as counsel of record for Respondent/Husband, ALEXANDER E. RODRIGUEZ, in the above-entitled action.

I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed and mailed this ninth day of July, 2008 to: MAURICE J. KUTNER, Esquire, Law Offices of Kutner and Associates 44 West Flagler Street, 11th Floor, Miami, FL 33130-1808 and ALAN J. KLUGER, Esquire, Kluger, Peretz, Kaplan & Berlin, PL, 201 South Biscayne Boulevard, Suite 1700, Miami, FL 33131-4332.

BUCHBINDER & ELEGANT, P.A.
Attorneys for Respondent/Husband
46 S.W. First Street, Fourth Floor
Miami, FL 33130
Telephone: (305) 358-1515
Facsimile: (305) 358-5202

By: E. Phillip Green for
IRA M. ELEGANT
Florida Bar No. 096760

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

FAMILY DIVISION

CASE NO. 08-16475 FC-16

IN RE: THE MARRIAGE OF

CYNTHIA A. RODRIGUEZ,

Petitioner-Wife,

and

ALEXANDER E. RODRIGUEZ,

Respondent-Husband.

DORIS PRIET

**WIFE'S REQUEST FOR
PRODUCTION OF DOCUMENTS**

RECEIVED FOR RECORD
JUL -9 PM 12:14
FAMILY DIVISION 470

The Wife requests, in accordance with Rule 1.350 of the *Florida Rules of Civil Procedure* and the applicable *Florida Family Law Rules of Procedure*, that the documents listed on the attached Schedule "A" be produced for inspection and copying, at the offices of KUTNER AND ASSOCIATES, within 30 days of the date of service.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the Wife's Request for Production of Documents was hand-delivered to IRA M. ELEGANT, ESQUIRE, Buchbinder & Elegant, P.A.,

[Rodriguez vs. Rodriguez, Case No. 08-16475 FC-16]

Commonwealth Building - 4th Floor, 46 S.W. 1st Street Miami, Florida 33130, this 7th day of July, 2008.

LILLY LAW OFFICE
4544 Post Oak Place - Suite 380
Houston, Texas 77027
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Fax: (713) 966-4466

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By: *Earle S. Lilly*
EARLE S. LILLY
Texas Bar No.: 12356000

By: *Maurice Jay Kutner*
MAURICE JAY KUTNER
Florida Bar No.: 44775

and

and

By: *John E. Vanness*
JOHN E. VANNESS
Texas Bar No.: 00792890

By: *Anthony P. Sabatino*
ANTHONY P. SABATINO
Florida Bar No.: 186809

/s/

SCHEDULE "A"

1. **Financial Affidavit** This affidavit is required by **Rule 12.285(d)(1)** of the **Florida Family Law Rules of Procedure**.
2. **Estimated Taxes**. Income tax records, including estimated tax returns, W-2, 1099 and K-1 Forms, payroll stubs and all other evidence of income since the filing of your last tax return.
3. **Income Tax Returns**. Personal, corporate, partnerships, joint ventures or other income tax returns, state and federal, including W-2, 1099 and K-1 Forms, in your possession or control from the inception of the marriage.
4. **Personal Property Tax Returns** filed in Florida or anywhere else from the inception of the marriage.
5. **Banking Information**. All monthly bank statements, passbooks, check stubs or registers, deposit slips, cancelled checks and bank charge notices on personal, business and corporate accounts, certificates of deposit, money management and retirement accounts, in your possession or control from banks, savings and loan institutions, credit unions or other institutions, which have been or are maintained at any time for or by you, individually, jointly or as a trustee or guardian, and in which you sign or have had any legal or equitable interest, for the period of the past three years.
6. **Financial Statements** submitted to banks, lending institutions or any other persons or entities, which were prepared by you or on your behalf at any time during the last five years.
7. **Applications for Loans and/or Credit**, and statements of loan/credit accounts for all loans or credit accounts applied for, whether approved or not, for the period of the last five years.

8. **Broker's Statements.** All statements of account from securities and commodities dealers and mutual funds maintained and received by you during the marriage and held individually, jointly or as a trustee or guardian.
9. **Stock, Bond and Mutual Funds Certificates,** held individually, jointly or as a trustee or guardian, including any stock brokerage accounts maintained and statements received during the marriage.
10. **Stock Options.** All records pertaining to stock options held in any corporation or other entity, exercised or not exercised.
11. **Pension, Profit Sharing, Deferred Compensation Agreements and Retirement Plans** or any other kind of plan owned by you or by any corporation in which you are or have been a participant during the marriage.
12. **Wills and Trust Agreements** executed by you or in which you have a present or contingent interest or in which you are named a beneficiary, trustee, executor or guardian and from which benefits have been received, are being received or will be received and which are or were in existence during the past five years, including inter vivos trusts. All records of declaration of trust and minute books for all trusts to which you are a party, including the certificates, if any, indicating such interest and copies of all statements, receipts, disbursements, investments and other transactions.
13. **Powers of Attorney** which have been given to you to act for any person within the past five years.
14. **Life Insurance** or certificates of life insurance currently in existence, insuring your life or the life of any other person in which you are named as either primary or contingent beneficiary, including any disability insurance currently in existence.

15. **General Insurance.** Insurance policies, including but not limited to, annuities, health, accident, casualty, motor vehicles of any kind, property liability, including contents insurance in which you are or have been the named insured for the last three years.
16. **Outstanding Debts.** Documents reflecting all debts owed to you or by you, secured or unsecured, including personal loans and lawsuits now pending or previously filed in any Court, showing the name of the debtor and/or creditors, the date each debt was incurred, the total amount and the unpaid balance. This request includes all correspondence, promissory notes, contracts or other writings, evidencing all debt owed to you or by you.
17. **Accounts Payable and Receivable** ledgers in your possession or control that are either personally or business related, together with all accounts, journals and work in progress reports.
18. **Cash Receipt Books,** calendar of events, retainer contracts with attorneys; evidence of budgets; cash projections and other financial documents in your possession. This applies to all such items in existence during the term of the marriage.
19. **Real Property.** All deeds, closing statements, tax bills, homestead exemption receipts, deposit receipt contracts, appraisals, mortgages, security agreements, leases and any other evidence (including monthly payments and present principal and interest balances) evidencing any type of interest or ownership, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partners, limited partners, shareholder, joint venturer, mortgagee, developer, manager or otherwise, during the term of the marriage; together with evidence of all contributions, in cash or otherwise, made by

you or on your behalf, toward the acquisition of such real estate during the marriage or thereafter.

20. **Sale and Option Agreements** on any real estate owned by you either individually, through another person or entity, jointly or as trustee or guardian.
21. **Personal Property**. Documents, invoices, contracts and appraisals on all personal property, including furniture, fixtures, furnishings, equipment, antiques and any type of collections, owned by you individually, jointly, as trustee or guardian or through any other person or entity during the term of the marriage, together with the amount of their respective liens.
22. **Firearms** registrations issued or pending receipt of governmental registration documents, owned, possessed or controlled by you during the past five years.
23. **Motor Vehicles**. Purchase orders, contracts, financing agreements, invoices, appraisals, lease agreements, registrations, payment books and titles to all motor vehicles owned by you, individually or jointly, at any time during the last five years, including airplanes, boats, automobiles or any other type of motor vehicle. This includes all motor vehicles in the names of any corporate entities in which you have an interest.
24. **Corporate Interest**. All records indicating any kind of personal interest in any corporation (foreign or domestic) or any other entities not evidenced by certificates or other instruments.
25. **Partnership and Joint Venture Agreements** to which you have been a party during the marriage.
26. **Employment Records**, during the term of the marriage showing evidence of wages, salaries, bonuses, commissions, raises, promotions, expense accounts and other benefits or deductions of any kind which were, are or may be paid, available,

credited or withheld for any purpose by any individual or entity or to which you were, are or may become entitled to in the future. This request includes all correspondence, buy-sell agreements, documents financial statements, distribution statements or any other writing, showing the amounts you have received either as salary or dividends from any person or entity which has employed you from the date of the marriage to date, and all contracts and evidence of income from any projects, speeches, consultant work or jobs other than your regular employment from the date of the marriage through the current date.

27. **Fringe Benefits.** All records evidencing any benefits available to you from any business entity in which you have a legal or equitable ownership interest, including, without limitation, to auto, travel, entertainment, educational and personal living expenses.

28. **Employment Contracts** under which you are performing services and/or rendering merchandise or materials, or under which someone is indebted to you for services and/or merchandise and materials already furnished, during the past three years, including a list or description of any oral contracts.

29. **Business Records.** If you are self employed, a partner, or own more than 10% of the outstanding capital stock of any corporation, please produce the documents requested in paragraphs 5, 6, 7, 8, 9, 10, 11, 13, 16, 17, 18, 19, 20 and 32, in the names of all such corporations. In addition, please produce Quicken® or other accounting reports, whether prepared internally or by an outside professional.

30. **Charge Accounts** controlled or authorized for your personal or business use, including all statements and receipts received by you in connection with the use of such charge accounts, together with a list of those businesses where you are or have been

authorized to charge purchases to the account of another person or entity, during the marriage.

31. Membership cards or documents identifying participation rights in any country clubs, key clubs, private clubs, associations or fraternal group organizations during the marriage, together with all monthly statements.

32. Judgments and pleadings in which you have been a party to, either as a Plaintiff or Defendant, during the marriage.

33. Gifts. All records pertaining to gifts of any kind made to you or by you to any person or entity, together with all records in connection with the transfer of personal property, by sale, gift or otherwise, during the marriage.

34. Charitable Contribution receipts, cancelled checks or other tangible evidence of charitable donations made by you.

35. Medical bills, prescriptions, evaluation reports or diagnosis for psychiatric treatment received during the last five years.

36. Telephone and long distance charges received by you in the form of monthly telephone statements for telephone numbers which have been in your name or the name of any corporation, partnership or other entity, in which you are a major shareholder, officer or director for the period of the past three years.

37. Tapes and Photographs. All written memoranda, reports, and photographs submitted to you or your attorney by any person other than yourself; all tape recordings and other evidence prepared from tape recordings made in connection with any wiretapping or other electronic surveillance conducted by you or others on your behalf.

38. **Legal Services Rendered** Produce copies of all statements for services rendered to you in connection with the dissolution of marriage proceedings and copies of all cancelled checks in payment of your legal fees in this cause.
39. **Safe Deposit Boxes**. The keys and any rental statements for any safety deposit box or boxes which you have or had and/or had access to from the date of the marriage through the current date.
40. **Surveillance Reports**. Any reports you have received from a detective, investigator or any other person based upon surveillance of your spouse.
41. **Passport** applications and copies of passports in your name or the names of your children.
42. **Correspondence** sent to you and by you in connection with this matter, including printouts of e-mail communications. This request shall include all e-mails you have sent or received from any source, regarding your financial matters, for the last three years.
43. **Electronic Evidence**. All electronic evidence and/or computerized materials contained in all computers to which you have access, including desktop and laptop computers located at your home and business, and handheld devices such as PDAs, Palm Pilots, Treos, iPhones, Sidekicks, Blackberries, etc., and all electronic, on-line accounts such as e-mail, bank and credit card accounts, which in any way relate to income, assets, liabilities, expenses, investments, loans, or monies in which you may have an interest. This request is inclusive of all such electronic financial materials for the last three years and you are directed to print and produce all of the electronic documents, summaries, and materials of every nature and description, relating to the computerized materials requested.