

IN THE CIRCUIT COURT OF THE  
17<sup>TH</sup> JUDICIAL CIRCUIT, IN AND  
FOR BROWARD COUNTY, FLORIDA

COMERICA BANK, a Texas  
banking corporation,

Plaintiff,

GENERAL JURISDICTION DIVISION

CASE NO.: CACE12013597 (18)

vs.

TROPIC RANCH INC., et. al.,

Defendants.

**RESPONSES AND OBJECTIONS TO  
REQUEST FOR ADMISSIONS**

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Defendants, H.K. HOTEL MANAGEMENT, LLC, TROPIC RANCH, INC., and HANNA KARCHO-POLSELLI, by and through their undersigned attorneys, hereby respond and object to Plaintiff's Request for Admissions, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Objection. This Request for Admission is vague and calls for a legal conclusion.
6. Objection. This Request for Admission is vague and calls for a legal conclusion.
7. Objection. What Defendants do and do not "have" is irrelevant. As Plaintiff is aware, Defendants are in the process of obtaining, and reasonably expect to obtain, the necessary financing to bring the Mortgage current.
8. Objection. What Defendants do and do not "have" is irrelevant. As Plaintiff is aware, Defendants are in the process of obtaining, and reasonably expect to obtain, the necessary financing to bring the Mortgage current.
9. Objection. This Request for Admission calls for a legal conclusion, and Plaintiff has shown no evidence that it has paid-out the amounts set forth in this Request for Admission.
10. Objection. This Request for Admission calls for a legal conclusion, and Plaintiff has shown no evidence that it has paid-out the amounts set forth in this Request for Admission.
11. Admitted.
12. Admitted.
13. Objection. Vague as to the time period covered this Request for Admission.

14. Admitted.

15. Admitted.

16. Admitted.

17. Denied. Due to Plaintiff's actions relative to the pool area, Defendants have had to revise plans, obtain new permits, etc.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was electronically served this 9<sup>th</sup> day of November, 2012 to: Brian K. Hole, Esq., Holland & Knight LLP, 515 E. Las Olas Blvd., Suite 1200, Fort Lauderdale, FL 33301-4249; E-Mail: [brian.hole@hkllaw.com](mailto:brian.hole@hkllaw.com).

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