

IN THE 15TH JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA

GABE HOFFMAN,

Plaintiff,

Case No. 50-2019-CA-013860-XXXX-MB

v.

THOMAS SCHOENBERGER, and
THOMAS SCHOENBERGER, LLC.

Defendants.

**DEFENDANT THOMAS SCHOENBERGER'S LIMITED APPEARANCE FOR THE
PURPOSES OF NOTIFYING THIS COURT OF THE SERVICE OF DISCOVERY
RESPONSES**

COMES NOW, the Defendant, THOMAS SCHOENBERGER, and enters this limited appearance for the sole purposes of responding to discovery. The Defendant does not assert any affirmative defenses or otherwise waive personal jurisdiction. The Defendant further notes the undersigned counsel raised the issue of personal jurisdiction during the most recent hearing in this matter and was assured by this Honorable Court that answering this discovery would not serve to waive his objection to personal jurisdiction or otherwise impact his pending motion to dismiss for lack of personal jurisdiction or his motion to quash. Further, the Defendant notes he is responding to this discovery solely to avoid sanctions with this Honorable Court and not because he believes he is subject to the personal jurisdiction of Florida Courts. Without waiving any of the foregoing, the Defendant responds as follows:

The Defendant has served upon counsel for the Plaintiff responses to the following discovery items:

1. Requests for Production
2. Interrogatories

Respectfully submitted on this the 28th day of December, 2020.

/s/ G. Baron Coleman

G. Baron Coleman

Florida Bar No. 0035489

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on December 28th, 2020, I have electronically filed the foregoing document with the Clerk of Court using the e-filing system which will send notification to all parties and counsel of record.

/s/ G. Baron Coleman

OF COUNSEL