

EXHIBIT 23

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

CHRISTOPHER E. DORWORTH,

Plaintiff,

v.

JOEL MICAH GREENBERG,
ANDREW W. GREENBERG, SUE
GREENBERG, ABBY GREENBERG,
AWG, INC., GREENBURG
DENTAL ASSOCIATES, LLC,
GREENBERG DENTAL &
ORTHODONTICS, P.A.,
GREENBERG DENTAL
SPECIALTY GROUP, LLC, and A.B.,

Defendants.

Case No.: 6:23-cv-00871-CEM-DCI

**DEFENDANT, ABBY GREENBERG'S, SUPPLEMENTAL ANSWERS AND
OBJECTIONS TO PLAINTIFF'S JUNE 29, 2023 INTERROGATORIES TO
ABBY GREENBERG**

The Defendant, Abby Greenberg (hereinafter "Greenberg"), by and through her undersigned counsel and pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby submits these supplemental answers and objections to Plaintiff's June 29, 2023 Interrogatories as follows:

INTERROGATORY NUMBER 1:

Identify the interactions you have had with Plaintiff at any time between January 1, 2016, and the present. For each interaction, state: (a) how the interaction occurred, e.g., in person, by phone, by text, (b) the date of the interaction, (c) the content of the interaction, and (d) documents reflecting the interaction.

RESPONSE:

The Defendant, Abby Greenberg, objects to this interrogatory on the ground that it seeks information that is not relevant to the dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to this interrogatory on the ground that it is overly broad as it is not limited by a reasonable timeframe or subject matter. The Defendant, Abby Greenberg, finally objects to this interrogatory on the ground that it is unduly burdensome as she frequently socialized with members of the Dorworth family during the relevant time period. Subject to and without waiver of the foregoing objections, Abby Greenberg states that the primary interactions with the Plaintiff, Christopher Dorworth, include the following:

Date of Interaction with Christopher Dorworth	Description of Interaction with Christopher Dorworth	Relevant Documents
January 8, 2019	Christopher Dorworth, Rebekah Dorworth, Abby Greenberg, and Joel Greenberg attended the first inauguration of Ron DeSantis together in Tallahassee, Florida	Photographs from trip
June 21, 2019	Christopher Dorworth, Rebekah Dorworth, Abby	Photographs from trip

	<p>Greenberg, and Joel Greenberg visit Washington, D.C. together including, without limitation, a trip to the White House</p>	
<p>June 4, 2020</p>	<p>On this date, the Defendant, Abby Greenberg, had a girls' dinner at Vineyards in Lake Mary, Florida. One of the attendees at the girls' dinner was Anne Pham. Following the girls' dinner, Abby Greenberg and Anne Pham went to Liam Fitzpatrick's Restaurant and Irish Pub in Lake Mary, Florida. Upon arriving at Liam Fitzpatrick's Irish Pub, Abby Greenberg and Anne Pham ran into Chris Dorworth who extended an invitation to a purported gathering at the Dorworth Residence. Shortly thereafter, Abby Greenberg and Anne Pham got into Mr. Dorworth's vehicle. Christopher Dorworth dropped Anne Pham off at her house and then went to the Dorworth Residence with Abby Greenberg; however, no one was present at the Dorworth Residence at the time. Therefore, Abby Greenberg requested that Mr.</p>	<p>Photographs from party at the Vineyards Wine Company in Lake Mary, Florida</p>

	Dorworth drive her home.	
June 23, 2020	Abby Greenberg reached out to Christopher Dorworth via telephone regarding the indictment of her then husband, Joel Greenberg	Not Applicable
August 24, 2020	Christopher Dorworth reached out to Abby Greenberg on the Signal Messaging App asking: "Loaded question but you ok?"; and "You need anything."	Please see bates number Abby Greenberg 27
October 4, 2023	Abby Greenberg observed Christopher Dorworth and Rebekah Dorworth at a comedy club	Not Applicable

INTERROGATORY NUMBER 2:

Identify the interactions you have had with Rebekah Greenberg [sic]¹ at any time between January 1, 2016, and the present. For each interaction, state: (a) how the interaction occurred, e.g., in person, by phone, by text, (b) the date of the interaction, (c) the content of the interaction, and (d) documents reflecting the interaction.

RESPONSE:

The Defendant, Abby Greenberg, objects to this interrogatory on the ground that it seeks information that is not relevant to the dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to this interrogatory on the ground that it is overly broad as it is not limited by a reasonable timeframe or subject matter. The Defendant, Abby Greenberg, finally objects to this interrogatory on the ground that it is unduly burdensome as she frequently socialized with members of the Dorworth family during the relevant time period. Subject to and without waiver of the foregoing objections, Abby Greenberg states that the primary interactions with Rebekah Dorworth include the following:

Date of Interaction with Rebekah Dorworth	Description of Interaction with Rebekah Dorworth	Relevant Documents
November, 2016	Abby Greenberg and Rebekah Dorworth attend victory rally to celebrate victory of Donald Trump and Mike Pence	Photographs of rally

¹ This is a typographical error in the interrogatory questions presented by the Plaintiff, Christopher Dorworth. For purposes of answering these interrogatories, the Defendant, Abby Greenberg, assumes that Mr. Dorworth meant Rebekah Dorworth and not Rebekah Greenberg.

May 19, 2018	Abby Greenberg and family visited Rebekah Dorworth at the Dorworth Residence for a birthday party.	Photographs from the visit
June 26, 2018	Abby Greenberg and Rebekah Dorworth visit the Dorworth's mountain retreat near Raleigh, North Carolina for a girls' weekend without their husbands.	Photographs from trip
December 29, 2018	Abby Greenberg, Joel Greenberg, and their children visited Chris and Rebekah Dorworth at the Dorworth Residence for a holiday party. Also in attendance at the party was Matt Gaetz.	Photographs from the party
January 8, 2019	Christopher Dorworth, Rebekah Dorworth, Abby Greenberg, and Joel Greenberg attended the first inauguration of Ron DeSantis together in Tallahassee, Florida	Photographs from trip
May 2, 2019	Abby Greenberg and Rebekah Dorworth attend event at Heathrow Country Club	Photographs from event
May 30, 2019	Abby Greenberg and Rebekah Dorworth visited with each other around the pool of the Dorworth Residence at a graduation party for one of Mr. Dorworth's children from Mr. Dorworth's prior marriage.	Photographs from visit

<p>June 21, 2019</p>	<p>Christopher Dorworth, Rebekah Dorworth, Abby Greenberg, and Joel Greenberg visit Washington, D.C. together including, without limitation, a trip to the White House</p>	<p>Photographs from trip</p>
<p>August 27, 2019</p>	<p>Abby Greenberg and Rebekah Dorworth attend campaign kickoff event for "Chris Anderson for Supervisor of Elections" at Heathrow Country Club.</p>	<p>Photographs of campaign kickoff event</p>
<p>July 19, 2020</p>	<p>Rebekah Dorworth and her minor child visit Abby Greenberg and her minor children at the JW Marriott Grande Lakes near Orlando, Florida. During the visit, the parties engage in shopping at the resort shops, swimming at the resort pool, and dining activities.</p>	<p>Photographs from July 19, 2020 visit</p>
<p>March 8, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Just ran into Michelle at the Sabatini event this morning and wanted to reach out.</p> <p>I am really sorry to hear about what happened with Joel last week, but obviously he has been causing you all great harm for a long time. I</p>	<p>Please see Bates Number Abby Greenberg 2</p>

	<p>hope you are finally able to take this opportunity as a fresh start for you and the kids.</p> <p>- Rebekah Dorworth</p> <p>Abby: Thank you. I have a lot of healing todo. He destroyed everything.</p> <p>Rebekah: The kids are young. They will be resilient. You are strong. I have no doubt . . .</p>	
<p>March 8, 2021 March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: The kids are young. They will be resilient. You are strong. I have no doubt you will take the time you need to heal and then be better for it. Looks like the real estate is going really well!</p> <p>Saw your post Hope you are healing. How are the kids?</p> <p>Abby: Thank you I feels good to not have to publicly support him anymore. Doing do I was always convincing myself that things were better than they were I always knew how shitty he was to me but hindsight is definitely</p>	<p>Please see Bates Stamp Abby Greenberg 11</p>

	<p>20/20. The freedom and release . . .</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: I always knew how shitty he was to me but hindsight is definitely 20/20. The freedom and release of tension I feel is so liberating and makes me realize how bad it really was.</p> <p>Rebekah: I am sure! He was so disrespectful to you publicly, goodness knows he was probably 100 times worse privately. I am glad you are free and safe. How is the new house?</p> <p>Abby: I never really got to see how he treated me publicly because he didn't bring me anywhere I know how bad it was privately It's amazing. I feel so comfortable there and relaxed</p>	<p>Please see Bates Number Abby Greenberg 15</p>
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Moving was definitely the right call. Fresh start How is Madison doing?</p>	<p>Please see Bates Number Abby Greenberg 24</p>

	<p>Abby: I knew I couldn't move until he was detained though. That's why I've been waiting. I knew he would snap</p> <p>Rebekah: Just glad you are safe</p> <p>Abby: Me too, thank you</p> <p>Rebekah: Does he get to come back out before trial? Or is he officially there until something is decided?</p> <p>Abby: No He did too many things that weekend that they can't talk about publicly</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Well, at least that is comforting For you . . . to sleep easy at night Has he tried to contact you?</p> <p>Abby: Only called me once. I declined.</p> <p>Rebekah: Good! I'm sure his parents are there for him. You shouldn't feel obligated after all that. and for safety purposes</p>	<p>Please see Bates Stamp Abby Greenberg 10</p>

	<p>It's ridiculous they haven't set a trial date. . . any word on when that will happen?</p> <p>Abby: The trial date is in June</p> <p>Rebekah: Jeesh that is long</p> <p>Rebekah: His parents aren't answering his calls either. They have been amazing to me</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: I am so happy to hear that. After everything he's done, I know they will step up for you and the kids.</p> <p>Abby: They have And that's why they bought me the house. They wanted to make sure I was safe and that he couldn't take anything else for me</p> <p>Rebekah: And you are getting to sell the other house right? So you will get that commission</p> <p>Abby: I'm sure there are other rumors. But that's the reason. I'll get the commission yes, it's</p>	<p>Please see Bates Number Abby Greenberg 3 and Bates Number Abby Greenberg 18</p>

	<p>empty and almost ready to list Anything else from me*</p> <p>Rebekah: Nice. Once that is off your hands, I feel like you will be really ready for the fresh start</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: This # is on my grandmas cell account. For good reasons</p> <p>Rebekah: I don't' even know how you even hack into people's phones! Michelle told me he did. That is so insane.</p> <p>Abby: He was the account holder and transferred my number to a new SIM card</p> <p>Rebekah: Crazy</p> <p>Abby: I didn't know how he did it Now I do. It was the sim</p> <p>Rebekah: Weird that you could still get texts/calls</p> <p>Abby: He put the sim into a new phone</p> <p>Rebekah: But could you still use your phone?</p>	<p>Please see Bates Stamp Abby Greenberg 7</p>

	<p>Abby: No</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: But could you still use your phone?</p> <p>Abby: No Once he was arrested I went to att and got it back because his dad is his POA</p> <p>Rebekah: So do you have your other phone back?</p> <p>Abby: Yeah I have both. Going to use my old number for business</p> <p>Rebekah: Smart Are they going to allow him into rehab?</p> <p>Abby: I tried for months and no one accepted him</p> <p>Rebekah: I guess you have to want to be there</p>	<p>Please see Bates Number Abby Greenberg 12</p>
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: I guess you have to want to be there</p> <p>Abby: I did everything I could to give him a fair shot at a trial without a public divorce and to get</p>	<p>Please see Bates Stamp Abby Greenberg 22</p>

	<p>him help so that he could be healthy and a good father when he got out. As terrible as he treated me, I did everything I could for him, for our kids and for that, I'm proud and can move forward in my life without any "what if's"</p> <p>Rebekah: Yes. I think you did a lot more then can be expected given the circumstances. He did this to himself.</p> <p>Abby: 100%</p> <p>Rebekah: You think you'll keep the name?</p> <p>Abby: Yes, because if I change it I have to change all my real estate info</p>	
<p>March 17, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Yeah. I get that. I wouldn't want to have a different name than my kids.</p> <p>Abby: That too There are so many Greenberg's anyway</p> <p>Rebekah: But to each their own on that</p> <p>Abby: Exactly</p>	<p>Please see Bates Number Abby Greenberg 19</p>

	<p>Rebekah: Do you think he will settle or is he bent on trial to get his freedom? try*</p> <p>Abby: No idea</p> <p>Rebekah: Yeah . . . guess you'll get your final closure then.</p>	
<p>March 19, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: Hey, if you wouldn't mind. Would you look at the purple dress we bought at the ritz and tell me the brand name?</p> <p>He burned mine and I loved the material. Want to see what else the brand has to offer</p> <p>Rebekah: Oh jeesh! I am up in the mountains right now but will check when I go home</p> <p>Abby: Thank you</p> <p>Rebekah: Can't believe he burned all your clothes. What a psychotic move. He must have been on something. No one does that sober.</p>	<p>Please see Bates Number Abby Greenberg 17</p>

<p>March 20, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Saw the news video. The press are jerks and never should have included you.</p> <p>Abby: You can't see my right? They blurred me? Just hear me?</p> <p>Rebekah: Just your voice, but it was shitty of them to include you They have the police transcripts</p>	<p>Please see Bates Number Abby Greenberg 23</p>
<p>March 20, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: I really wish they did quote me talking about the new house</p> <p>Rebekah: They did</p> <p>Abby: I know I heard that I wasn't sure if you saw a new clip that showed me</p> <p>Rebekah: Oh, you mean didn't</p> <p>Abby: Didn't*</p> <p>Rebekah: Yeah; totally unnecessary. Can't believe they included</p>	<p>Please see Bates Number Abby Greenberg 25</p>

	<p>Abby: I'm glad people finally know the truth about what's he's done to me though</p>	
<p>March 24, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: Are you talking to yapo? I just walked into mathers. It's my moms 50th and him and his friend Peter (I think that's his name) are here and sat at our table</p> <p>Rebekah: I was talking to him on the phone earlier, yes. Just saw this. Happy Birthday to your Mom? !** Pete's great</p> <p>Abby: He said something about talking to you</p> <p>Rebekah: Yeah, I had called him about some triathlon stuff we had been talking about</p> <p>Abby: It was just ironic lol</p>	<p>Please see Bates Number Abby Greenberg 14</p>
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p>	<p>Please see Bates Stamp Abby Greenberg 16</p>

	<p>Rebekah: Hey . . . Dozens of reporters have reached out to us. We have not been responding to anything but they said today they emailed today they are going to run a story that there are allegations that Joel often brought, what they referred to as, “the women” to my home to party so we decided to break silence.</p> <p>Chris told them that Joel has never brought another woman other than his wife to our home and as “our wives are friends” this behavior never would have been tolerated in our home.</p> <p>Just FYI, if you read anything saying otherwise – your husband did not bring any women or dates to my home and I would have not tolerated it on behalf of you. Goodness knows I am not shy and would have told you immediately. Just people out to drag Chris into the story with . . .</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Just people out to drag Chris into the</p>	<p>Please see Bates Number Abby Greenberg 5 and Bates Number Abby Greenberg 8</p>

	<p>story with rumors, but wanted you to hear it from me.</p> <p>Abby: Thank you</p> <p>Rebekah: I am so sorry about all you and the family are going through. I wish he never ran for office.</p> <p>Abby: I wish girls weren't such whores. He wouldn't have been able to have sex with girls that made the decision not to have sex with a married man for money</p> <p>The only comment I'll really make about that is M [REDACTED] [Z] [REDACTED] is an evil person and I would not engage with her. I've called her out and she still won't apologize</p> <p>I hate that no matter how good of a wife and mom I was Or how much I wish for my life to be what I thought it would be the . .</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: . . . M [REDACTED] [Z] [REDACTED] is an evil person and I would not engage with her. I've</p>	<p>Please see Bates Number Abby Greenberg 26</p>

	<p>called her out and she still won't apologize</p> <p>I hate that no matter how good of a wife and mom I was Or how much I wish for my life to be what I thought it would be the day I got married . . it'll never be.</p> <p>Rebekah: I see why you would think that/feel that way about women, but we are the married ones (ourselves and our spouses). It's our job to protect our marriages, not women who don't have any reason to care about you or your family. I get why you are angry though.</p> <p>honestly, from what I am told, Joel was telling everyone that you knew, were fine with it, and had your own stuff on the side (from what you have told me that isn't true, and Joel never said that to me until the Marriott).</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: But now is the time for you to start fresh and make that same commitment in your own life. I think you are going</p>	<p>Please see Bates Stamp Abby Greenberg 6</p>

	<p>to have a wonderful life once you are able to get past this. You are so strong, a hard worker, and you have incredible kids. It's a horrible time, but will get better!</p> <p>Abby: I was never ok with it. There were so many times I even called you asking if you knew where he was.</p> <p>There is nothing more I could have done to protect my marriage. I did so much.</p> <p>All these people that claimed he told them I was ok with it. . . I was at home pregnant and nursing from aug 2016 – Jan 2019</p> <p>How would I have had my own stuff on the side? People should have told me. I was always asking. If I was ok with it why would I ask so many questions.</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: It is the girls fault that met me and continued to have sex with him. It's my "friends" fault for going to my wedding, my baby showers, my birthdays and lying to my face</p>	<p>Please see Bates Number Abby Greenberg 21</p>

	<p>about having sex with my husband</p> <p>Rebekah: Yeah . . . and if he was ever with us at a bar, I assure you he didn't have any women around me.</p> <p>Again, had I known I would have told you. The only time he ever mentioned people you had slept with was at the Marriott which you confirmed and said you had a hall pass. Prior to that, I had never heard that you were into that OR that you were ok with him doing that.</p> <p>Abby: And Joel's so called "friends" that were around and continued to enable his behavior</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Abby: Once you understand narcissism and sociopath behavior. All these things enabled him to do what he was doing</p> <p>Rebekah: listen, you don't have to convince me that what they did was complete bullshit to you</p>	<p>Please see Bates Number Abby Greenberg 4</p>

	<p>Abby: I know. I'm just venting Now I understand why he pushed me to have a hall Pass so badly</p> <p>Rebekah: Yeah, guilt</p> <p>Abby: I told him I hated it and wanted a monogamous marriage Then once he was indicted and things weren't getting better between us I tried to convince myself that if I saw other people I would be able to move on and not let him hurt me anymore</p> <p>Rebekah: I get people wanting to have . . .</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: I get people wanting to have open relationships, I don't get people wanting open marriages. What's the point?</p> <p>Abby: Exactly I don't get it either</p> <p>Rebekah: Yeah, the hurt is still there. I get trying to make yourself feel better</p>	<p>Please see Bates Stamp Abby Greenberg 9</p>

	<p>Abby: The day I got married. . . I wanted to marry him and only him</p> <p>Rebekah: I don't think he was ready for marriage. Obviously</p> <p>Abby: Getting elected was not good for a new marriage And he had some really Really shitty friends. Friends that enjoyed partying with him</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: I have asked Chris, and he has said Joel never brought women around him. Showed him pics one time and said he asked if you were ok with it. . . he said that's when he told him you were fine with it</p> <p>Abby: I know if my friends were doing that I would tell them I don't support the behavior and wouldn't hang around with someone who acted like that and treated their spouse so poorly</p> <p>Rebekah: Should have told me . . . Would have ratted him out</p>	<p>Please see Bates Number Abby Greenberg 20</p>

	<p>Chris told me Joel asked if he wanted to have sex with you. Chris said he that was a crazy question and thought he was joking since you and I are were friends. Like he could just pimp you out. Scary what he was behaving like.</p>	
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth engage in the following text messaging:</p> <p>Rebekah: Chris said no (obviously) I never liked the way he spoke about you and I did stand up for you. But it wasn't about women to me, he was just being disrespectful. And I do agree we all should be standing up more against things that are not protective of our marriages Guys need to be better about this</p> <p>Abby: Joel claims he only always said nice things about Me to others. That's clearly a lie</p> <p>Rebekah: [H]e was a dick. Even Chris yelled at him one time when he called you a bad name in front of me.</p>	<p>Please see Bates Number Abby Greenberg 1</p>
<p>April 7, 2021</p>	<p>Abby Greenberg and Rebekah Dorworth</p>	<p>Please see Bates Number Abby Greenberg 13</p>

	<p>engage in the following text messaging:</p> <p>Rebekah: How are the kids doing at the new school?</p> <p>Abby: Is an awesome school It's So much better than lakeside They love it</p> <p>Rebekah: Great! Which one?</p> <p>Abby: Wekiva Presbyterian CCC</p>	
<p>October 24, 2023</p>	<p>Abby Greenberg observed Christopher Dorworth and Rebekah Dorworth at a comedy club</p>	<p>Not Applicable</p>

INTERROGATORY NUMBER 3:

For the time period of January 1, 2016, to the present, identify transactions entered into by, or on behalf of, Abby Greenberg that in any way relate to Plaintiff, A.B., the Seminole County Tax Collector's Office, the criminal charges brought against Joel Greenberg identified in the Complaint, the allegations that formed the basis of those criminal charges, or any assertion in any other operative pleading at the time of your response.

RESPONSE:

The Defendant, Abby Greenberg, objects to this interrogatory on the ground that it seeks information that is not relevant to the dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to this interrogatory on the ground that it is overly broad as it is not limited by a reasonable timeframe or subject matter. The Defendant, Abby Greenberg, also objects to this interrogatory to the extent it requests documents that “in any way relate” to the listed categories as courts have found the phrase “related to” “to be overly broad.” *See, e.g., State Nat’l Ins. Co. v. Lamberti*, No. 08-60760-CIV, 2009 WL 702239, at *3 (S.D. Fla. Mar. 17, 2009) (collecting cases); *Great Lakes Transp. Holding LLC v. Yellow Cab Serv. Corp. of Fla.*, No. 10-80241-CIV, 2010 WL 5093746, at *6 (S.D. Fla. Dec. 8, 2010) (same). The Defendant, Abby Greenberg, further objects to Interrogatory Number Three (3) on the ground that Plaintiff’s blanket request for information amounts to financial discovery that, barring a claim for punitive damages, “is not appropriate until after a judgment is entered.” *In re: Fiddler’s Creek, LLC*, No. 2:14-CV-379-FTM-29CM, 2016 WL 3906927, at *3 (M.D.

Fla. July 19, 2016) (collecting cases); *see also Jeld-Wen, Inc. v. Nebula Glass Int'l Inc.*, No. 07-22326-CIV, 2008 WL 11333314, at *4 (S.D. Fla. Feb. 26, 2008) (“[D]iscovery of personal financial information is ordinarily limited to discovery in aid of execution, where punitive damages are sought, or where the financial information is relevant to the subject matter of the pending action.”). Additionally, Article 1, Section 23 of the Florida Constitution protects Defendant, Abby Greenberg’s, interest in her financial information absent a relevant or compelling reason to compel disclosure. *See Optimal Logistics LLC v. AG Plus Express, LLC*, No. 618CV2224ORL41GJK, 2019 WL 13248327, at *3 (M.D. Fla. Dec. 19, 2019); *Mogul v. Mogul*, 730 So. 2d 1287, 1290 (Fla. 5th DCA 1999); *Friskney v. Am. Park & Play, Inc.*, No. 04-80457-CIV, 2005 WL 8156048, at *2 (S.D. Fla. Nov. 2, 2005) (“[T]he Court recognizes that the right of privacy guaranteed by the Florida Constitution protects the financial information of private persons, unless there is a relevant and compelling need to compel disclosure.”). Subject to and without waiver of the foregoing objections, the Defendant, Abby Greenberg, states as follows:

- (1) From January 1, 2016 to the present, the Defendant, Abby Greenberg, had no financial transactions with the Plaintiff, Christopher Dorworth.
- (2) From January 1, 2016 to the present, the Defendant, Abby Greenberg, had no financial transactions with the Defendant, A.B.
- (3) From January 1, 2016 to the present, the Defendant, Abby Greenberg, had no financial transactions with the Seminole County Tax Collector’s Office other than paying the Seminole County Tax Collector, in its capacity as an agent for the Florida

Department of Safety and Motor Vehicles, for the issuance of tag and title registrations associated with vehicles owned and/or operated by the Defendant, Abby Greenberg.

(4) From January 1, 2016 to the present, the Defendant, Abby Greenberg, did not have any financial transactions relating to the criminal charges brought against Joel Greenberg identified in the Verified Amended Complaint, or the allegations that formed the basis of those criminal charges.

INTERROGATORY NUMBER 4:

Identify all individuals with whom you have discussed Plaintiff, whether verbally or in writing, at any time between January 1, 2016, and the present. For each individual, state: (a) the manner in which the discussion occurred, e.g., in person, by phone, by text, (b) the date(s) of the discussions, (c) the subject matter of the discussions, and (d) documents reflecting the discussions. Note: Conversations with your attorneys are excluded from the scope of this interrogatory.

RESPONSE:

The Defendant, Abby Greenberg, objects to this interrogatory on the ground that it seeks information that is not relevant to the dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to this interrogatory on the ground that it is overly broad as it is not limited by a reasonable timeframe or subject matter. The Defendant, Abby Greenberg, additionally objects to this interrogatory on the ground that it is unduly burdensome as she frequently socialized with members of the Dorworth family during the relevant time period. The Defendant, Abby Greenberg, finally objects to this interrogatory to the extent that it seeks information protected from disclosure by the attorney client; work product; husband-wife; marital; and/or spousal privileges. Subject to and without waiver of the foregoing objections, the Defendant, Abby Greenberg, states as follows:

The discovery taken in this case to date reflects that on Saturday, July 15, 2017, the Plaintiff, Christopher Dorworth, hosted a party at his residence located at 1520 Whistable Court; Lake Mary, Florida 32746 (hereinafter, "the Dorworth Residence")

with the following guests present: (1) A.B.; (2) K [REDACTED] M [REDACTED]; (3) B [REDACTED] G [REDACTED]; (4) Matt Gaetz; (5) C [REDACTED] F [REDACTED]; (6) Christopher Dorworth; (7) [REDACTED]; (8) Joel Greenberg; (9) Joe Ellicott; (10) Mike Fischer; (11) an unidentified male; and (12) two unidentified females. *See* A.B.’s Answers to Interrogatories Dated November 16, 2023; Joel Greenberg’s Answers to Interrogatories Dated November 14, 2023; and K [REDACTED] M [REDACTED]’s Affidavit dated November 16, 2023.

The guest ledger produced by the Heathrow Master Association (see below) also reflects that the following guests were granted access to the gated community wherein Mr. Dorworth resides presumably to attend the July 15, 2017 party at the Dorworth Residence:

07/15/2017 03:20:45 PM	MIKE FISHER	HLGC62	1520 WHISTABLE COURT
07/15/2017 04:42:24 PM	G [REDACTED] B [REDACTED]	[REDACTED]	1520 WHISTABLE COURT
07/15/2017 06:15:21 PM	[REDACTED] A. B.	[REDACTED]	1520 WHISTABLE COURT
07/15/2017 08:50:01 PM	K [REDACTED] M [REDACTED]	[REDACTED]	1520 WHISTABLE COURT
07/15/2017 11:15:14 PM	JOSEPH ELLICOTT (DENIED)	DENIED	NOT ON LIS 1520 WHISTABLE COURT
07/15/2017 11:16:44 PM	JOESPH ELLICOTT	BGJOE78	1520 WHISTABLE COURT

Of significance here, the License Plate reported for A.B. was [REDACTED]. At the relevant time—July 15, 2017—that license plate was registered in the name of [REDACTED] [REDACTED] [REDACTED], who is believed to be the mother of A.B. In that connection, please see the information below:

Previous Owner/Registrant/Lien Information - 04/24/2017 to 12/05/2017

Title Holders

[REDACTED]

Title Number: [REDACTED]
State Titled In: FL
Original Title Date: 05/20/2017
Title Transfer Date: 05/20/2017

Lien Holders

SANTANDER CONSUMER USA

Registrant

[REDACTED] [View Person Record](#)
Registered: 04/24/2017 to 12/05/2017

Addresses Registered to While owned by [REDACTED]

[REDACTED]

Vehicle Tag History

License Plate: [REDACTED] Valid from: (05/20/2017)

In these circumstances, it appears that A.B. took her mother's car to attend the July 15, 2017 party at the Dorworth Residence.

A.B. was born on [REDACTED] 1999. *See* Defendant A.B.'s Responses to Defendant, Abby Greenberg's, First Request for Admissions. As a result, A.B. was seventeen (17) years old at the time of the party hosted by Christopher Dorworth at the Dorworth Residence on July 15, 2017. *See* Defendant A.B.'s Responses to Defendant, Abby Greenberg's, First Request for Admissions.

Upon information and belief, A.B. was enrolled in school at [REDACTED] High School. At the time of the party hosted by Christopher Dorworth at the Dorworth Residence, A.B. had completed her junior year at [REDACTED] High School and was on summer break.

According to the affidavit of K [REDACTED] M [REDACTED], Mr. Dorworth was present at the Dorworth Residence at the same time as A.B. on July 15, 2017. *See* Affidavit of K [REDACTED] M [REDACTED] at ¶10. Moreover, A.B. was naked in the presence of Christopher Dorworth at the July 15, 2017 party at the Dorworth Residence. *See* Affidavit of

K [REDACTED] M [REDACTED] at ¶11. In that connection, please see the excerpts from the affidavit of K [REDACTED] M [REDACTED] below:

10. On Saturday, July 15, 2017, I observed Christopher Dorworth at the Dorworth residence at the same time as A [REDACTED] B [REDACTED]

11. On Saturday, July 15, 2017, I observed A [REDACTED] B [REDACTED] naked in the presence of Christopher Dorworth at the Dorworth residence.

It appears from the affidavit of Ms. M [REDACTED] that the attendees of the party at the Dorworth Residence including, without limitation, A.B., had “access to the bedrooms in the Dorworth Residence to engage in sexual activities” as well as “alcohol, cocaine, ecstasy also known as molly, and marijuana.” *See* Affidavit of K [REDACTED] M [REDACTED] at ¶12.

The interrogatory answers of A.B. indicate that there was an interaction between Mr. Dorworth and A.B. prior to the July 15, 2017 party at the Dorworth Residence. In that connection, please see A.B.’s Answer to Interrogatory Number One (1) below:

Answer: I had two interactions with Mr. Dorworth. The first time was at a hotel in Lake Mary, Florida, in 2017. Present in the room were Mr. Dorworth, Mr. Greenberg, and me. Mr. Greenberg was on the couch. Both Mr. Dorworth and I took off our clothes and got on the bed. At that point, we engaged in various sexual activities. The entire sexual interaction was ten to fifteen minutes. During this time, Mr. Greenberg and Mr. Dorworth were talking and laughing. After the sexual interaction, Mr. Dorworth explained that he needed to get home. He put his clothes on. I put my clothes on. The three of us then left the hotel room. Mr. Greenberg and I walked to my car. Mr. Greenberg provided me with an envelope with one thousand dollars in cash and said to me, “this is from Chris,” or words along those lines.

The Defendant, Abby Greenberg, was not present at the hotel in Lake Mary in approximately June or July of 2017 when the first interaction between A.B. and Christopher Dorworth purportedly occurred. Moreover, the Defendant, Abby Greenberg, was not present at the July 15, 2017 party at the Dorworth Residence. Instead, during the relevant timeframe on July 15, 2017, the Defendant, Abby Greenberg, was at her the home of her in-laws—Susan and Andrew Greenberg—with her newborn child that she gave birth to on May 23, 2017. Notably, Joel Greenberg was not with Abby Greenberg when she visited her in-laws on July 15, 2017 as Joel Greenberg was at the party hosted by Mr. Dorworth.

Inasmuch as Defendant, Abby Greenberg, was not at the hotel in Lake Mary in approximately June or July of 2017 or the Dorworth Residence on July 15, 2017, she does not have firsthand, personal knowledge of the interactions between A.B. and Christopher Dorworth.

In the summer of 2000, the Defendant, Abby Greenberg, met with government officials regarding Joel Greenberg and her relationship with Joel Greenberg. In the course of those meetings, Abby Greenberg never discussed: (a) A.B.; (b) Christopher Dorworth; (c) any interactions that may have occurred between A.B. and Christopher Dorworth before the July 15, 2017 party at the Dorworth Residence; and (d) any the facts and circumstances arising out of and/or relating to July 15, 2017 party at the Dorworth Residence. The Defendant, Abby Greenberg, has never met A.B. Moreover, she has never spoken with A.B.

INTERROGATORY NUMBER 5:

Identify the cell phone numbers Abby Greenberg used at any time between January 1, 2016, and the present, and for each number, the respective cell phone provider.

RESPONSE:

- (407)-921-0233 (personal phone)
- (407)-484-2689 (work phone)
- The carrier for both of the cell phone numbers referenced above is AT&T
- Please note that the Defendant, Abby Greenberg, also utilized a prepaid phone purchased from Walmart for a short period during the relevant time; however, she does not recall the telephone number associated with that prepaid phone.

INTERROGATORY NUMBER 6:

Identify the messaging apps Abby Greenberg used at any time between January 1, 2016, and the present. For each app, identify the corresponding user name. Examples of messaging apps include, but are not limited to, iMessage, WhatsApp, Slack, Discord, Google Chat/Google Hangout, Facebook Messenger, and Microsoft Teams.

RESPONSE:

Messaging App	UserName
Signal Messenger	Please note that there is no username for Signal Messenger. It is just your telephone number. For telephone numbers, please see response to interrogatory number five (5) above.

INTERROGATORY NUMBER 7:

Identify the email addresses Abby Greenberg used at any time between January 1, 2016, and the present.

RESPONSE:

- Abby.Greenberg@icloud.com
- abby@abbygreenberg.com
- Abby.greenberg23@gmail.com
- Abby Greenberg also utilizes an email address through her employer for business purposes only in connection with her job as a realtor.

INTERROGATORY NUMBER 8:

Identify financial accounts, including, but not limited to bank accounts, credit accounts, debit accounts, or cryptocurrency accounts, Abby Greenberg held either personally, or through a business entity, at any time between January 1, 2016, and the present.

RESPONSE:

The Defendant, Abby Greenberg, objects to Interrogatory Number Eight (8) on the ground that it seeks information that is not relevant to the issues in dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to Interrogatory Number Eight (8) on the ground that it is overly broad as the interrogatory request is not limited by a reasonable timeframe and/or subject matter. The Defendant, Abby Greenberg, also objects to Interrogatory Number Eight (8) on the ground that Plaintiff's blanket request for information amounts to financial discovery that, barring a claim for punitive damages, "is not appropriate until after a judgment is entered." *In re: Fiddler's Creek, LLC*, No. 2:14-CV-379-FTM-29CM, 2016 WL 3906927, at *3 (M.D. Fla. July 19, 2016) (collecting cases); *see also Jeld-Wen, Inc. v. Nebula Glass Int'l Inc.*, No. 07-22326-CIV, 2008 WL 11333314, at *4 (S.D. Fla. Feb. 26, 2008) ("[D]iscovery of personal financial information is ordinarily limited to discovery in aid of execution, where punitive damages are sought, or where the financial information is relevant to the subject matter of the pending action."). The Defendant, Abby Greenberg, finally objects to Interrogatory Number Eight (8) on the ground that it invades her right to privacy under Article I, Section 23, of the Florida

Constitution. *See McFall v. Welsh*, 301 So. 3d 320, 321 (Fla. 5th DCA 2019) (“... [T]he Florida Constitution protects the disclosure of financial information of private persons if there is no relevant or compelling reason to require disclosure because ‘personal finances are among those private matters kept secret by most people.’”) (internal citations omitted); *Mogul v. Mogul*, 730 So. 2d 1287, 1290 (Fla. 5th DCA 1999) (“The financial information of private persons is entitled to protection by this state’s constitutional right of privacy, if there is no relevant or compelling reason to compel disclosure”).

Subject to and without waiver of the foregoing objections, the Defendant, Abby Greenberg, states that she has never held any cryptocurrency accounts.

INTERROGATORY NUMBER 9:

Identify business entities in which Abby Greenberg has held an ownership interest at any time between January 1, 2016, and the present. For each entity, identify the percentage owned, number of shares or equivalent units owned, the date the shares/units were acquired, your basis in the shares/units, current value, and if sold or otherwise relinquished, the amount received and date.

RESPONSE:

The Defendant, Abby Greenberg, objects to Interrogatory Number Nine (9) on the ground that the information sought is not relevant to the issues in dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to Interrogatory Number Nine (9) on the ground that Plaintiff's blanket request for information as to all of her corporate ownership interests amounts to financial discovery that, barring a claim for punitive damages, "is not appropriate until after a judgment is entered." *In re: Fiddler's Creek, LLC*, No. 2:14-CV-379-FTM-29CM, 2016 WL 3906927, at *3 (M.D. Fla. July 19, 2016) (collecting cases); *see also Jeld-Wen, Inc. v. Nebula Glass Int'l Inc.*, No. 07-22326-CIV, 2008 WL 11333314, at *4 (S.D. Fla. Feb. 26, 2008) ("[D]iscovery of personal financial information is ordinarily limited to discovery in aid of execution, where punitive damages are sought, or where the financial information is relevant to the subject matter of the pending action."). Additionally, Article 1, Section 23 of the Florida Constitution protects Defendant, Abby Greenberg's, interest in her financial information absent a relevant or compelling reason to compel disclosure. *See Optimal Logistics LLC v. AG Plus Express, LLC*, No. 618CV2224ORL41GJK, 2019 WL

13248327, at *3 (M.D. Fla. Dec. 19, 2019); *Mogul v. Mogul*, 730 So. 2d 1287, 1290 (Fla. 5th DCA 1999); *Friskney v. Am. Park & Play, Inc.*, No. 04-80457-CIV, 2005 WL 8156048, at *2 (S.D. Fla. Nov. 2, 2005) (“[T]he Court recognizes that the right of privacy guaranteed by the Florida Constitution protects the financial information of private persons, unless there is a relevant and compelling need to compel disclosure.”). The Defendant, Abby Greenberg, further objects to Interrogatory Number Nine (9) on the ground that the request is overly broad as it is not limited by a reasonable timeframe and/or subject matter. The Defendant, Abby Greenberg, finally objects to Interrogatory Number Nine (9) on the ground that some of the information sought is readily available to Plaintiff, Christopher Dorworth, by doing a search on the website of the Florida Secretary of State. Subject to and without waiver of the foregoing objections, the Defendant, Abby Greenberg, refers the Plaintiff, Christopher Dorworth, to the chart below:

Name of Company	Date of Involvement	Current Status of Company	Position with Company	Miscellaneous Notes
Homes With Abby Greenberg, PLLC	Company Created May 1, 2023	Active	Authorized Member	
Greenberg Media Group, Inc.	The Defendant, Abby Greenberg, Was Added to Officer/Director Detail on July 6, 2020	Inactive	Chief Financial Officer	Administrative Dissolution for Annual Report on September 24, 2021

DG3 Network, Inc.	The Defendant, Abby Greenberg, Was Added to Officer/Director Detail on July 6, 2020	Inactive	Chief Financial Officer	Administrative Dissolution for Annual Report on September 24, 2021
JMG Ventures, LLC	The Defendant, Abby Greenberg, was Added to Member Detail on October 15, 2018	Inactive	Manager	Administrative Dissolution for Annual Report on September 27, 2019
The Golden Group FL, Inc.	Company Created June 28, 2022	Active	President	

INTERROGATORY NUMBER 10:

Identify the accountants, CPAs, tax professionals, bankers, financial advisors, and persons in similar occupations who have been used by Abby Greenberg at any time between January 1, 2016, and the present.

RESPONSE:

The Defendant, Abby Greenberg, objects to Interrogatory Number Ten (10) on the ground that it seeks information that is not relevant to the issues in dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to Interrogatory Number Ten (10) on the ground that it is overly broad as the interrogatory request is not limited by a reasonable timeframe and/or subject matter. The Defendant, Abby Greenberg, additionally objects to Interrogatory Number Ten (10) on the ground that Plaintiff's blanket request amounts to financial discovery that, barring a claim for punitive damages, "is not appropriate until after a judgment is entered." *In re: Fiddler's Creek, LLC*, No. 2:14-CV-379-FTM-29CM, 2016 WL 3906927, at *3 (M.D. Fla. July 19, 2016) (collecting cases); *see also Jeld-Wen, Inc. v. Nebula Glass Int'l Inc.*, No. 07-22326-CIV, 2008 WL 11333314, at *4 (S.D. Fla. Feb. 26, 2008) ("[D]iscovery of personal financial information is ordinarily limited to discovery in aid of execution, where punitive damages are sought, or where the financial information is relevant to the subject matter of the pending action."). The Defendant, Abby Greenberg, finally objects to Interrogatory Number Ten (10) on the ground that it invades her right to privacy under Article I, Section 23, of the Florida Constitution. *See McFall v. Welsh*, 301 So. 3d 320, 321 (Fla. 5th DCA 2019) (" . . . [T]he Florida

Constitution protects the disclosure of financial information of private persons if there is no relevant or compelling reason to require disclosure because ‘personal finances are among those private matters kept secret by most people.’”) (internal citations omitted); *Mogul v. Mogul*, 730 So. 2d 1287, 1290 (Fla. 5th DCA 1999) (“The financial information of private persons is entitled to protection by this state’s constitutional right of privacy, if there is no relevant or compelling reason to compel disclosure.”).

INTERROGATORY NUMBER 11:

For the period of January 1, 2016, to the present, identify payments received from, or on behalf of, any Defendant in this matter. Note: Payments from Joel Greenberg made prior to Joel and Abby's date of separation are excluded from the scope of this interrogatory.

RESPONSE:

The Defendant, Abby Greenberg, objects to Interrogatory Number Eleven (11) on the ground that it seeks information that is not relevant to the issues in dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to Interrogatory Number Eleven (11) on the ground that it is overly broad as the interrogatory request is not limited by a reasonable timeframe and/or subject matter. The Defendant, Abby Greenberg, further objects to Interrogatory Number Eleven (11) on the ground that Plaintiff's blanket request for information amounts to financial discovery that, barring a claim for punitive damages, "is not appropriate until after a judgment is entered." *In re: Fiddler's Creek, LLC*, No. 2:14-CV-379-FTM-29CM, 2016 WL 3906927, at *3 (M.D. Fla. July 19, 2016) (collecting cases); *see also Jeld-Wen, Inc. v. Nebula Glass Int'l Inc.*, No. 07-22326-CIV, 2008 WL 11333314, at *4 (S.D. Fla. Feb. 26, 2008) ("[D]iscovery of personal financial information is ordinarily limited to discovery in aid of execution, where punitive damages are sought, or where the financial information is relevant to the subject matter of the pending action."). Additionally, Article 1, Section 23 of the Florida Constitution protects Defendant, Abby Greenberg's, interest in her financial information absent a relevant or compelling

reason to compel disclosure. See *Optimal Logistics LLC v. AG Plus Express, LLC*, No. 618CV2224ORL41GJK, 2019 WL 13248327, at *3 (M.D. Fla. Dec. 19, 2019); *Mogul v. Mogul*, 730 So. 2d 1287, 1290 (Fla. 5th DCA 1999); *Friskney v. Am. Park & Play, Inc.*, No. 04-80457-CIV, 2005 WL 8156048, at *2 (S.D. Fla. Nov. 2, 2005) (“[T]he Court recognizes that the right of privacy guaranteed by the Florida Constitution protects the financial information of private persons, unless there is a relevant and compelling need to compel disclosure.”). The Defendant, Abby Greenberg, also objects to Interrogatory Number Eleven (11) on the ground that it is unduly burdensome as Andrew W. Greenberg and Susan Greenberg are family members and Abby Greenberg is their former daughter-in-law and mother of their grandchildren. Subject to and without waiver of the foregoing objections, the Defendant, Abby Greenberg, states as follows:

- (1) From January 1, 2016 to the present, Defendant, Abby Greenberg, has received no payments from Defendant, AWG, Inc.
- (2) From January 1, 2016 to the present, Defendant, Abby Greenberg, has received no payments from Defendant, Greenberg Dental Associates, LLC;
- (3) From January 1, 2016 to the present, Defendant, Abby Greenberg, has received no payments from Defendant, Greenberg Dental & Orthodontics, P.A.;
- (4) From January 1, 2016 to the present, Defendant, Abby Greenberg, has received no payments from Defendant, Greenberg Dental Special Group, LLC; and
- (5) From January 1, 2016 to the present, Defendant, Abby Greenberg, has received no payments from Defendant, A.B.

(6) From April 25, 2022 (when the divorce of Defendant, Abby Greenberg, and Defendant, Joel Greenberg, was finalized) to the present, Defendant, Abby Greenberg has received no payments from the Defendant, Joel Greenberg.

The Defendant, Abby Greenberg, will not list payments received from Defendants, Andrew and Susan Greenberg, during the timeframe delineated above based on the objections delineated above.

INTERROGATORY NUMBER 12:

Identify (a) individuals retained by or on behalf of Abby Greenberg to investigate or surveil Chris Dorworth, Rebekah Dorworth, or their business enterprises, (b) the dates performed, and (c) documents regarding any such investigation or surveillance.

RESPONSE:

In response to Interrogatory Number Twelve (12), Defendant, Abby Greenberg, states that she did not hire any entity and/or individual to surveil Chris Dorworth; Rebekah Dorworth; and/or their business enterprises.

INTERROGATORY NUMBER 13:

For the time period of January 1, 2016, to the present, identify each interaction you had with state and federal law enforcement, including district attorneys and investigators, concerning Joel Greenberg and Chris Dorworth. For each contact, state with whom it occurred, the date of contact, the general substance of the contact, and documents that reflect the interaction.

RESPONSE:

In response to Interrogatory Number Thirteen (13), the Defendant, Abby Greenberg, objects on the ground that any statements made to state and/or federal law enforcement are protected from civil liability by qualified privilege. Subject to and without waiver of that objection, Defendant, Abby Greenberg, refers Plaintiff, Christopher Dorworth, to the interactions with state and federal law enforcement delineated in the table below.

Date of Contact with Federal and/or State Law Enforcement Officials	Name of Participants	Substance of the Contact	Documents Reflecting Interaction
Summer, 2020	Abby Greenberg; Joel Greenberg; Vincent A. Citro; and various federal law enforcement authorities	Abby Greenberg met and conferred with numerous federal law enforcement authorities for approximately forty-five (45) minutes to one hour at the law offices of Vincent	There are no documents in the possession, custody, and/or control of Defendant, Abby Greenberg

		A. Citro to discuss Joel Greenberg and her relationship with Joel Greenberg	
Summer, 2020	Abby Greenberg; Joel Greenberg; Vincent A. Citro; and two (2) federal law enforcement authorities	Abby Greenberg met and conferred with two (2) law enforcement authorities for approximately one (1) hour in follow up to the first meeting referenced above again at the law offices of Vincent A. Citro to discuss Joel Greenberg and her relationship with Joel Greenberg	There are no documents in the possession, custody, and/or control of Defendant, Abby Greenberg
Fall, 2020	Abby Greenberg; Joel Greenberg; and Seminole County Sheriff's Office	Report of domestic disturbance involving Joel Greenberg wherein Joel Greenberg was not arrested by state authorities	911 Telephone Recording and Police Report none of which are in the possession, custody, and/or control of Defendant, Abby Greenberg
February 28, 2021	Abby Greenberg; Joel Greenberg; and Jupiter Police Department	Report of domestic disturbance involving Joel Greenberg wherein Joel Greenberg was not arrested by state authorities	911 Telephone Recording and Police Report none of which are in the possession, custody, and/or control of Defendant, Abby Greenberg

March 3, 2021	Abby Greenberg; Joel Greenberg; and Seminole County Sheriff's Office	Report of domestic disturbance involving Joel Greenberg wherein Joel Greenberg was arrested and taken into custody by authorities	Police report; and arrest records none of which are in the possession, custody, and/or control of Defendant, Abby Greenberg
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In further response to Interrogatory Number Thirteen (13), the Defendant, Abby Greenberg, affirmatively states that she never testified in front of a state or federal grand jury at any time.


INTERROGATORY NUMBER 14:

For the time period of January 1, 2016, to the present, identify the source(s) of funds with which your legal fees have been paid and documents reflecting such source(s).

RESPONSE:

The Defendant, Abby Greenberg, objects to this interrogatory request on the ground that it seeks information that is not relevant to the issues in dispute as framed by the pleadings. The Defendant, Abby Greenberg, further objects to this interrogatory request on the ground that it is overly broad as it is not limited by a reasonable time frame and/or subject matter or even to the instant proceeding. Indeed, as it currently reads, this interrogatory encompasses information about the Defendant, Abby Greenberg's, divorce proceedings. The Defendant, Abby Greenberg, finally objects to this interrogatory request on the ground that it seeks information protected from disclosure by the attorney client and/or work product privileges. Subject to and without waiver of the above-referenced objections, the Defendant, Abby Greenberg, states that her legal defense in the instant litigation is being funded by the Andrew and Susan Greenberg.

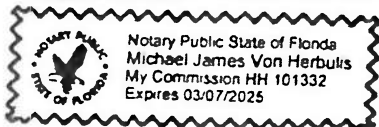
VERIFICATION PAGE

By: 
Abby Greenberg


STATE OF FLORIDA

COUNTY OF SEMINOLE


The foregoing instrument was acknowledged before me by means of physical presence or online notarization this 13th day of March, 2024, by Abby Greenberg who is personally known to me or who has produced Driver's License as identification and who did (did not) take an oath, and who says that she executed the foregoing Answers to Interrogatories and that the Answers are true and correct to the best of her knowledge, information, and belief.



(seal)


Notary Public

Michael Von Herbulis
Printed Name

By: 
Jason Perkins, counsel for Defendant, Abby Greenberg

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on Thursday, March 14, 2024, a copy of the foregoing document was served by email to all counsel of record.

/s/ Jason A. Perkins
Jason A. Perkins, Esq.