

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

CHRISTOPHER E. DORWORTH,

Plaintiff,

v.

Case No.: 6:23-cv-871-CEM-DCI

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

Defendants.

**DEFENDANTS' MOTION FOR ENTITLEMENT
TO ATTORNEY'S FEES, COSTS, AND SANCTIONS**

In 2017, Chris Dorworth—a former state legislator turned lobbyist—reveled in the prestige of connected friends, like Congressman Matt Gaetz, entertaining them with parties featuring illicit drugs and young women. Many women who attended Dorworth’s parties were recruited and paid by his new protege, Joel Greenberg, a political novice recently elected to local office. But everything collapsed after Joel was indicted for stalking in June 2020. The ensuing investigation quickly turned to Joel’s activities with A.B., [REDACTED]

[REDACTED]

A.B. then [REDACTED] Soon afterward, Dorworth learned [REDACTED]

[REDACTED]

[REDACTED] Betraying his guilt, Dorworth [REDACTED]

Spinning a tale from a meeting and text exchange with Joel, Dorworth claimed that he was the victim of a conspiracy—that Joel was paying A.B.’s lawyers, controlling her testimony, and punishing Dorworth for refusing to try to convince then-President Trump to pardon Joel. Despite Dorworth’s efforts, the investigation became national news in spring 2021, largely because it involved Congressman Gaetz. In early April, the *New York Times* confronted Dorworth with reports that the FBI was investigating whether he had sex with A.B. while she was a minor. Dorworth then quit his lobbying firm and then laid low for two years—only acting after A.B. threatened to sue him for sex trafficking and statutory rape at the end of 2022.

In a nearly 1,000 paragraph complaint, Dorworth swore under oath that he was the victim of a vast conspiracy in violation of the Racketeer Influenced and Corrupt Organizations Act (RICO). Dorworth—preposterously—accused Joel’s ex-wife, Joel’s parents, and dental-practice entities associated with Joel’s father, of conspiring with Joel’s sex trafficking victim, A.B., to falsely accuse Dorworth and Gaetz of sexual misconduct. This conspiracy’s supposed goal was to help reduce Joel’s sentence and retaliate for Dorworth’s refusing to seek a pardon for Joel. In his complaint, Dorworth lied by claiming that he did not know if A.B. had been to his home and that he never met nor partied with A.B. He then repeated his lies and frivolous theories in a second complaint that he and his wife both verified under oath.

Though Dorworth’s accusations were plainly false, it took great expense¹ to investigate and prove them false and baseless through over 16 months of proceedings. First, Dorworth’s guest ledger from his gated community revealed that A.B. attended the July 15, 2017 party while she was a minor. A.B. and her friend K.M. then testified

_____ They also testified that

_____ Thus, notwithstanding Dorworth’s effort to deflect and deny wrongdoing

¹ Pursuant to LR 7.01(b)(2), Defendants provide their respective fair estimates of the amount of fees and costs sought to be recovered: Andrew and Susan Greenberg and AWG, Inc. have incurred approximately \$935,000 in attorney’s fees and \$1,086.63 in taxable costs. Andrew and Susan Greenberg have incurred an additional \$28,810.67 in taxable costs. Abby Greenberg has incurred approximately \$360,000 in attorney’s fees and \$35,844.89 in taxable costs. The Greenberg Dental entities incurred approximately \$150,000 in attorney’s fees.

by raising an entirely implausible and baseless claim of conspiracy, un rebutted evidence shows exactly why Dorworth became the subject of investigation.

In July 2024, Defendants also obtained Dorworth's cell phone location records, proving that he was present at the July 15, 2017 party. Even faced with these records, Dorworth [REDACTED]

[REDACTED] With such proof, Andrew, Susan, and Abby Greenberg served a Rule 11 motion on Dorworth's counsel. Beyond detailing unanimous firsthand testimony disproving any conspiracy, the motion cited new evidence. Most critically, the respected former federal prosecutor that Dorworth said Defendants had paid to secure false testimony from A.B. further refuted Dorworth's theory in a declaration explaining that he met A.B. only once, that he never represented A.B., that he was never paid to meet A.B., and that he was never contacted by any defendant but A.B.

During Dorworth's 21-day Rule 11 safe harbor period, an affidavit by B.G.—who Dorworth claimed [REDACTED]

[REDACTED]—further proved Dorworth's claims false. B.G. confirmed that [REDACTED]

[REDACTED] Two days after B.G. signed her affidavit and five days before the Rule 11 safe harbor period expired, Dorworth finally dismissed his entire case—effectively conceding its frivolousness from the start. Defendants now seek their reasonable attorney's fees under (1) Florida's RICO statute and (2) the Court's inherent powers. Defendants also seek to convert Dorworth's dismissal without prejudice to a dismissal with prejudice as a sanction under the Court's inherent power.

First, precisely because treble damages might tempt plaintiffs to improperly assert costly-to-defend RICO claims, Florida’s RICO act allows defendants to recover their “attorney’s fees and court costs” for claims pursued “without substantial fact or legal support.” § 772.104(3), Fla. Stat. A defendant can make this showing even “after a plaintiff’s voluntary dismissal of the claim.” *Royal Palm Vill. Residents, Inc. v. Slider, Inc.*, No. 8:19-CV-874-CEH-SPF, 2021 WL 4452898, at *5 (M.D. Fla. Sept. 29, 2021); *see also Wardak v. Goolden*, No. 1:19-CV-21121-RAR, 2020 WL 6749171, at *5 n.4 (S.D. Fla. Sept. 8, 2020) (same).

Defendants’ burden under § 772.104(3) is far, far lower than it would be under Florida’s Rule 11 analogue—§ 57.105, Fla. Stat.—which itself “does not require a finding of frivolousness.” *Martin Cnty. Conserv. All. v. Martin Cnty.*, 73 So. 3d 856, 858 (Fla. 1st DCA 2011); *Hartford Ins. of the Midwest v. Miller*, 681 So. 2d 301, 302 (Fla. 3d DCA 1996) (explaining that § 772.104(3)’s standard is “much less strict than that contained in Florida Statute section 57.105(1)”). This “less stringent” standard serves to “discourage frivolous Rico claims ... because the stigma and burden of defending such claims is so great.” *Miller*, 681 So. 2d at 302. Thus, though they can and will, Defendants need not show that Dorworth’s claim was frivolous, that he lied, or that there was a “complete absence of a justiciable issue of either law or fact.” *Id.* (citation omitted). As discussed below, Defendants need only show that Dorworth’s RICO claim lacked substantial support (considering the evidence as it was when he dismissed)—a point Dorworth effectively conceded in dismissing his whole case to avoid a Rule 11 motion.

Second, this Court has the inherent power to impose sanctions when a party acts in subjective bad faith, *Hyde v. Irish*, 962 F.3d 1306, 1310 (11th Cir. 2020), such as when a party repeatedly lies under oath, *Obukwelu v. Bd. of Trs. Fla. State Univ.*, 837 F. App’x 686, 688 (11th Cir. 2020). Sanctions may include awarding fees. *Chambers v. NASCO, Inc.*, 501 U.S. 32, 45 (1991). Beyond fees, the Court’s inherent powers include broad “discretion ... to fashion an appropriate sanction for conduct which abuses the judicial process.” *Id.* at 44–45. On top of awarding fees, the Court should use that power to convert Dorworth’s dismissal without prejudice into one with prejudice—something the Court may do even after a notice of voluntary dismissal. *See Zow v. Regions Fin. Corp.*, 595 F. App’x 887, 889 (11th Cir. 2014) (affirming conversion of voluntary dismissal under Rule 41(a)(1)(A)(i) to dismissal with prejudice). Here, Dorworth plainly acted in bad faith when he lied under oath for over 16 months—from his first complaint to his deposition about a month before dismissing this action. Defendants thus meet the standards for this Court to award attorney’s fees and impose the sanction of dismissal with prejudice against Dorworth.²

BACKGROUND

I. On July 15, 2017, Dorworth attended a party at his home featuring illicit drugs and young females, [REDACTED]

After Joel was first elected to office in 2016, Dorworth befriended, worked, and socialized with Joel. *See* Doc. 1-1 ¶¶ 211, 213, 222. By summer 2017, Joel was

² Throughout, “Defendants” refers to the parties bringing this motion: Andrew, Susan, and Abby Greenberg, and AWG, Inc., Greenberg Dental Associates, LLC, Greenberg Dental & Orthodontics, P.A., and Greenberg Dental Specialty Group, LLC.

regularly meeting teen girls and women in their early twenties through a website and recruiting them for sex with himself and others in exchange for compensation. [REDACTED]. See Ex. 1 at 23:2–23, 26:2–8.³

On July 15, 2017, [REDACTED] and others attended one of multiple parties at Dorworth’s home that involved “alcohol; cocaine; middle-aged men; and young attractive females.” Doc. 183-2 ¶ 24; Ex. 2 ¶¶ 16, 19. This party sits at the heart of this case. A.B. testified [REDACTED]. Ex. 1 at 77:11–20. Both [REDACTED] *Id.* at 84:3–10. A.B. testified that she [REDACTED],⁴ once on [REDACTED] ⁵ *Id.* at 107:7–25. A.B. testified that Dorworth saw [REDACTED] *Id.* at 108:10–22. She also testified to [REDACTED] that evening. *Id.* at 101:13–102:8. In turn, Dorworth testified that A.B.’s

³ Because, though confidentiality designations under the parties’ confidentiality agreement, Dorworth has claimed that many of the documents relevant to this motion are subject to protection from disclosure under applicable law, Defendants are contemporaneously filing a motion to seal Exhibits 1, 2, 4, 11, 12, 13, 19, and 27. Defendants do not believe these exhibits should be maintained under seal and ask that the Court deny the motion to seal and permit filing on the open docket. In the interim, however, the Court may access these exhibits as attachments to Defendants’ motion to seal.

⁴ At his deposition, Dorworth [REDACTED] Ex. 1 at 96:21–25 [REDACTED] Dorworth claimed that [REDACTED]. Doc. 183-5 at 347:12–13 [REDACTED] But Dorworth’s wife, Rebekah Dorworth, testified that “[y]ou can see the pool out of a couple of bedrooms” in the Dorworth home that she would describe as guest bedrooms. Doc. 181-1 at 398:17–20. Though a minor point, it neatly encapsulates Dorworth’s refusal to tell the truth under oath.

⁵ Ms. Dorworth confirmed the presence of an air hockey table in her house during this time period. Doc. 181-1 at 261:1–9.

testimony about her [REDACTED]
Doc. 183-5 at 353:16–18.⁶ But B.G., another attendee at that party, confirmed A.B.’s
testimony under penalty of perjury. Ex. 2 (Doc.) ¶ 16 [REDACTED]
[REDACTED]

K.M., [REDACTED], also attended the party. *See* Ex. 3 at 6; Doc. 181-1 at
252:23–253:8 (Ms. Dorworth confirming that a July 15, 2017 video depicts K.M. at
Dorworth’s home). K.M. recounted [REDACTED]. Ex. 4 at
27:20–28:3. She also observed [REDACTED]
[REDACTED]. *Id.* at 31:3–21. Both K.M. and A.B. [REDACTED]
[REDACTED]. Ex. 4 at 32:19–33:17. K.M. took [REDACTED]
[REDACTED] *id.* at 38:11–12, and saw [REDACTED], *id.* at 41:2–5.
From her experience that evening, K.M. testified [REDACTED]
[REDACTED]. *Id.* at 318:25–319:3.

II. Three years later, Joel was indicted and a broader investigation ensued.

In June 2020, Joel was indicted for stalking a political opponent. After further
investigation, Joel was charged with and ultimately pleaded guilty to sex trafficking a
child (A.B.) and to identity theft, wire fraud, stalking, and conspiracy. *See* Ex. 5 at 1–

⁶ Dorworth designated his entire deposition transcripts confidential *after* he dismissed this action and
after those transcripts were filed on the record. He has made no effort to remove those transcripts from
the record. Even so, to avoid any accusation that Defendants have somehow violated the parties’
confidentiality agreement, Defendants have redacted portions of this motion citing Doworth’s depo-
sition transcripts.

⁷ Falsely maintaining that he had never met A.B., Dorworth also testified that— [REDACTED]
[REDACTED]
[REDACTED] Doc. 183-5 at 352:14–353:15.

2. Soon after his first indictment, Joel allegedly confronted Rebekah Dorworth at a resort, saying “that it would be better for everyone if he got a pardon” and expressing concern that Gaetz and another man might have criminal exposure if people found out they had sex with A.B. Doc. 181-1 at 352:12–18, 354:1–14, 359:16–360:13.

Dorworth, in his verified complaints, recounted meeting Joel soon after that alleged incident. Doc. 1-1 ¶¶ 362–391; *see also* Doc. 62 ¶¶ 91–98. In allegations later contradicted by Dorworth’s sworn testimony, Dorworth alleged that Joel’s statements at that meeting included that Joel “was concerned about his exposure for sexual misconduct with A.B.,” Doc. 62 ¶ 91, that Joel “was paying for A.B.’s attorney’s fees in an attempt to shape her testimony so that he could avoid charges” and that Joel “and his parents would seek A.B.’s cooperation by ‘paying her off,’” *id.* ¶¶ 92–93.⁸ Dorworth claimed that, when he refused Joel’s request that he help Joel seek a pardon, Joel “threatened to ‘make this a problem for everyone’ by falsely claiming that Dorworth, ... Gaetz, and others were involved in [Joel’s] criminal actions.” *Id.* ¶ 98.

On August 14, 2020—after Dorworth’s alleged meeting with Joel—Joel messaged Dorworth, first saying that he wanted the U.S. Attorney investigating him fired. Doc. 62-3 at 2. Referring to A.B. by an alias, Joel then said that he was having to pay for A.B. to retain a lawyer, that investigators wanted her to talk, that he believed

⁸ At his deposition, despite testifying [REDACTED], Doc. 183-6 at 34:3–4, Dorworth gave an entirely different story of the meeting recounted under oath in his complaint. Dorworth testified that [REDACTED]

[REDACTED] *Id.* at 26:13–24 [REDACTED] *id.* at 62:11–20 (testifying that [REDACTED]

[REDACTED] Dorworth gave both stories under oath; at least one was a lie.

“Venmo was the link,” and that he needed Dorworth’s help. *Id.* Dorworth sharply retorted, “I have nothing to do with any of this Not. Fucking. Cool.,” *id.*, to which Joel protested, “I’m trying to let everyone know who came into contact with these girls” and “I would think you’d want to at least have a heads up if some chick says she partied at your house ,” *id.* Dorworth says [REDACTED] [REDACTED] Doc. 183-6 at 66:25–67:6.

III. As Joel and Dorworth exchanged messages, A.B. [REDACTED].

Before dismissing this action, Dorworth claimed that Joel’s alleged statements at their last meeting—and in their last exchange—show that Joel (and by extension his parents and AWG, Inc.) paid a lawyer named Andrew Searle to shape A.B.’s testimony. Dorworth [REDACTED] [REDACTED] *See* Doc. 183-5 at 226:20–228:16; Ex. 6 at 6–7; Ex. 7 at 11. All evidence (and common sense) stands to the contrary.

At A.B.’s first meeting with a detective on about August 14, 2024, she [REDACTED] [REDACTED] . Ex. 1 at 131:7–11. [REDACTED], A.B. plainly didn’t conspire with anyone to lessen Joel’s criminal liability—Joel was indicted days later for sex trafficking A.B., and her report would *support* Joel’s indictment and conviction.⁹ *See* Ex. 8.

Dorworth’s speculation about A.B.’s meeting with Searle is also baseless. *See*

⁹ Defendants noted this absurdity in Dorworth’s theory in their motions to dismiss his claims last year, highlighting that Joel being charged and convicted with sex trafficking A.B. is inconsistent with Dorworth’s claim that Defendants conspired with A.B. to reduce Joel’s sentence. Doc. 77 at 7–8; Doc. 79 at 10. Dorworth dismissed his claims while those motions were pending.

Ex. 9 ¶¶ 7–8; *see also* Ex. 1 at 276:19–22; *id.* at 138:11–17. Indeed, before A.B. briefly met Searle, she had *already* met with a detective ██████████ ██████████—as reflected in the snapchat exchange on which Dorworth relies, Ex. 6 at 6–7 (K.M. telling Joe Ellicott that A.B. is meeting the detective “now,” before Ellicott responds to give K.M. Searle’s number to pass on to A.B.). A.B. never hired Searle and ██████████ Ex. 1 at 138:16–17, 283:12–14; Ex. 9 ¶ 8.¹⁰ Dorworth’s own counsel elicited testimony ██████████ ██████████ Ex. 1 at 254:7–16, and that ██████████ ██████████ *id.* at 254:18–19. A.B. also testified that ██████████ ██████████, *id.* at 140:25–141:7, or said that ██████████ ██████████ *id.* at 143:13–24. Searle confirmed there was no agreement with any third-party to pay for his meeting with A.B. and that he never was paid. Ex. 9 ¶ 9; *see also* Ex. 10 at 2, 6, 10 (Greenbergs confirming under oath they never paid A.B.’s attorney). And Defendants did not even try to pay A.B.’s fees, as no defendant (except A.B.) ever contacted Searle. Ex. 9 ¶ 10.

Rather than conspiring against Dorworth, A.B. ██████████, Ex. 1 at 138:18–21, ██████████ *id.* at 141:13–25, and then ██████████, *see id.* at 133:7–25. At this point, Defendants could not possibly have controlled A.B.—much less to the end Dorworth alleges—as she ██████████

¹⁰ Similarly, K.M. testified that A.B. ██████████, as she ██████████. Ex. 4 at 280:10–14, 351:8–20.

[REDACTED]

[REDACTED] *Id.* at 132:1–133:25. Indeed, A.B. told the FBI

[REDACTED]

Id. at 132:20–21. Obviously, that would upend a conspiracy to lessen Joel’s criminal liability, as would A.B. providing the same testimony, as she did, [REDACTED]

[REDACTED]. *Id.* at 375:6–14, 376:1–7. Simply put, it was frivolous for Dorworth to allege and maintain his theory about Defendants hiring a lawyer to help A.B. provide statements [REDACTED] to authorities.

IV. Dorworth learned [REDACTED], then he lied to investigators as part of a cover up.

Soon after A.B. [REDACTED], Gaetz and B.G. told Dorworth that

[REDACTED]

See Ex. 11 at 2; Doc. 183-5 at 292:6–19. Dorworth also [REDACTED]

[REDACTED]. *See* Doc. 183-5 at 287:4–11. He says [REDACTED]

[REDACTED] *See id.* at

287:10–11. For support, [REDACTED]

[REDACTED]. *See* Doc. 183-5 at

320:12–18; *see also* Doc. 1-1 ¶ 520. But Dorworth did, in fact, know A.B. and he was

at the party.

In December 2020, Dorworth received a federal subpoena, Doc. 180 at 7, and

then [REDACTED] Doc. 183-5 at 36:13–19. He claims

that [REDACTED]

Id. at 38:7–17. Dorworth [REDACTED]
[REDACTED] *Id.* at 85:17–86:2. Indeed, Dorworth recounted
[REDACTED] *Id.* at 37:14–23. In doing so, Dor-
worth violated 18 U.S.C. § 1001, something he later accused Defendants of doing.
Doc. 62 ¶ 473.

Dorworth then perpetuated his lies. In a May 7, 2021 letter to investigators,
Dorworth’s lawyer, Mr. Hornsby, [REDACTED]
[REDACTED], Ex. 13 at 1, but
claimed [REDACTED] *Id.* at 2. He then provided [REDACTED]
[REDACTED]
[REDACTED] *Id.* at 1, 5. Hornsby claimed [REDACTED]
[REDACTED] concluding that [REDACTED]
[REDACTED]
[REDACTED]. *Id.* at 1–2. And in an October 4, 2021
letter to investigators, Hornsby claimed [REDACTED]
[REDACTED]
[REDACTED]. Ex. 11 at 2–3. From this, Hornsby claimed it was [REDACTED]
[REDACTED]
[REDACTED] *Id.* at 3.

But the grand jury’s focus on Dorworth and his home is not evidence of a re-
tributive RICO conspiracy; the grand jury’s focus on Dorworth is evidence that inves-
tigators received truthful testimony. And that testimony could have come various

partygoers outside of the alleged RICO conspiracy—there were at least ■.¹¹ Ex. 2 ¶ 12; Ex. 4 at 128:20–23.

V. Using his lies to investigators, Dorworth sues to preempt A.B.’s claims.

In December 2022, the same month Joel was sentenced, A.B. sent Dorworth a demand letter announcing her intention to sue him for sex trafficking and statutory rape. *See* Doc. 62 ¶ 479. On April 7, 2023, Dorworth filed his first verified complaint, seeking a declaration that he never had sex with A.B. or paid her for sex.¹² Doc. 1-1 at 114–15. The verified complaint was also replete with immaterial, impertinent, and scandalous material about Abby Greenberg, that was offered only to malign and embarrass her. Those allegations—which did not support any factual element of any claim against Abby or any other party—were ultimately withdrawn.

But Dorworth went further: across 918 paragraphs, he theorized a RICO enterprise—consisting of Joel, Joel’s parents Andrew and Susan, Joel’s ex-wife Abby, AWG, Inc., and three Greenberg Dental Entities, *id.* ¶¶ 10–17—claiming they tried but failed to extort him either to seek a pardon for Joel or to have the prosecutor investigating Joel reassigned, *id.* ¶ 3. Defendants, he claims, then conspired to “falsely accuse[] Dorworth of being involved in, among other things, child sex trafficking and

¹¹ All witness who testified about the party reported the presence of more young women—in addition to K.M., B.G., and A.B. Ex. 12 at 49:1–6; Doc. Ex. 1 at 116:2–3 (discussing the ■■■■■■■■■■); Ex. 4 at 128:20–129:7 (■■■■■■■■■■). Any, or all, of these women could also have, and likely did, testify before the grand jury—as L.P. admits she did. Doc. 183-2 ¶ 30 (L.P. stating that she “testified to a grand jury about the parties at the Dorworth Residence in the Summer and Fall of 2017”).

¹² In filings before the Court, Dorworth conceded that A.B.’s claims against him were “a substantial part of the reason that [he] should [sic] relief in the first place.” Doc. 139 at 8.

an illegal ghost candidate scheme” in retribution. *Id.* ¶ 4. To that end, Defendants allegedly “compensated” A.B. “to provide false testimony ... against” Dorworth, *id.* ¶ 20, by “paying A.B.’s attorney fees,” *id.* ¶¶ 800(c), (d). Dorworth further claimed that the alleged enterprise violated RICO by funding Joel’s criminal defense, *id.* ¶¶ 672–74, and by paying Joel’s restitution, *id.* ¶¶ 690–93. Based on these (factually baseless) allegations, Dorworth asserted several claims, including RICO conspiracy.

Dorworth also repeated the false story Hornsby’s letter relayed to federal authorities: that Joe Ellicott invited A.B. to Dorworth’s house but that Dorworth does not know whether A.B. ever took Ellicott up on that invitation. *Id.* ¶¶ 440–45; Doc. 183-5 at 86:2–3. Dorworth likewise claimed that he “has never, to the best of his recollection, met, ... , communicated, or interacted in any way with A.B.” Doc. 1-1 ¶ 439; *see also id.* ¶¶ 419, 423 (claiming Dorworth never met A.B. and “never ‘partied’ with A.B. at his house”). These allegations were clearly false.

After Defendants removed this case to federal court and filed motions to dismiss, Dorworth filed a second verified complaint, incorporating his entire first complaint. Doc. 62 ¶ 348. To it, Dorworth also added a claim for conspiracy under Florida’s RICO statute, § 772.103(4), Fla. Stat., against Andrew, Susan, and Abby Greenberg, Doc. 62 at 54–55. Across 498 paragraphs, Dorworth attempted to fix his failure to allege any facts supporting his claim that Defendants agreed to his claimed conspiracy—largely through at least 45 allegations based solely on “information and belief.”¹³

¹³ Doc. 62 ¶¶ 9, 26–27, 29, 105, 116, 120–22, 142, 148, 151–54, 161, 168, 173, 177, 212–13, 228, 243, 275, 300, 305, 308, 312–15, 325, 327, 349, 353, 356–58, 368–70, 374, 376, 392, 397.

Dorworth also expanded the conspiracy’s alleged goal to obtaining cooperation credit for Joel through false testimony. *Id.* ¶ 7. For support, he devoted an entire section of his second complaint to his strange claim that any assistance Joel’s parents provided him “exceeded” “normal or lawful assistance from parents to a son,” and Dorworth alleged that Joel’s parents paid his restitution and settled potential claims by Seminole County against themselves and Joel. *Id.* at 48, ¶¶ 391–97.

Elsewhere, he claimed that Joel’s parents knew of all activity in Joel’s case—including what information Joel provided to the government and whether it was true—because they were paying Joel’s lawyer. *See id.* ¶¶ 325–26. And perhaps most bizarrely, Dorworth claimed, again upon information and belief, that Joel’s parents’ support to Abby Greenberg—the suddenly financially vulnerable mother of two of their grandchildren—was somehow a bribe for false testimony. *See id.* ¶¶ 314–15. When Defendants again moved to dismiss, Joel’s parents highlighted the absurdity of these claims, noting that the Florida Bar rules expressly contemplate a third party paying for another’s attorney, that the Middle District’s own website contains instructions on how to pay another’s criminal restitution, and that “there is no ‘reasonable’ limit of support to grandchildren beyond which a presumption of liability arises.” Doc. 122 at 7–8.

Dorworth’s absurd claims never had a factual basis. Ms. Dorworth, who also verified the amended complaint, began to testify—before being interrupted and coached by the Dorworth family’s attorney to not reveal their “legal strategy”—that she and Dorworth made allegations upon information and belief with the hope they would “find out” in discovery. *See* Doc. 181-1 at 309:13–18. Thus, even at this early

point in the case, Dorworth’s claims lacked fact or legal support *and* were subject to dismissal. *See, e.g., Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 556–57 (2007) (requiring “plausible grounds to infer an agreement”).

VI. After lying in his complaints, Dorworth repeatedly lies during discovery.

After twice verifying allegations that he never met or partied with A.B., Dorworth had to maintain that fiction to pursue this case. So Dorworth lied repeatedly in discovery about his location on July 15, 2017. To a request for admission, Dorworth again repeated his story from Hornsby’s letter, concluding that he “cannot admit or deny whether A.B. was present at his home” on July 15, 2017. Ex. 14 at 1–2. Unprompted, Dorworth also produced a July 1, 2024 declaration from his friend, Morris, averring he “understand[s]” the picture of him that Dorworth [REDACTED] was taken on July 15, 2017. Ex. 15 ¶ 11. Morris otherwise averred in generalities that he and Dorworth would go boating “usually late afternoon until sunset,” that he and Dorworth would celebrate their birthdays together in mid-July, that—after boat trips—he and Dorworth would “invariably socialize well into the evening and night,” and that he believes Dorworth “is a good person.” *Id.* ¶¶ 4–14.

Defendants also asked Ms. Dorworth about the July 15th party. She testified that she was in Texas at the time. Doc. 181-1 at 383:25–384:2; *see also* Ex. 16 at 3. Still, Ms. Dorworth testified that Dorworth was not home the night of July 15, 2017 because he spent the night at Morris’s house. Doc. 181-1 at 234:15–17, 241:4–9, 457:9–10. [REDACTED], Doc. 183-5 at 295:15–17, and despite knowing it was false, took no action to correct it. He also likely induced said testimony.

Id. at 56:13–14 (“I prepped with my husband and with my attorney separately.”).

Then, Dorworth testified that he [REDACTED]. Doc. 183-5 at 177:1–2 [REDACTED]. After that, he said that he [REDACTED]. *Id.* at 177:3–12, 242:11–12, 244:1–245:2. Then Dorworth committed to his earlier lies with fabricated equivocation, [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. [REDACTED]. *Id.* at 156:17-23, 244:5–12, 245:12–14, 281:17-25, 285:2-5, 309:21-310:6; Doc. 183-6 at 121:19-22, 122:11-24, 209:18-24, 217:13-16, 218:10-17.

These sworn statements are demonstrably false. Besides A.B., K.M., and B.G.’s sworn statements, all [REDACTED], objective cell-tower data shows Dorworth was home the night of July 15, 2017—far from Morris’ house.

VII. Objective cell-tower records confirm that Dorworth lied under oath.

Defendants obtained Dorworth’s cell phone records, which show the location of the cell tower(s), and the side of the cell site antenna, used to transmit calls and texts to and from Dorworth’s cell phone. Defendants retained an expert, Aaron Weiss, to

¹⁴ *Id.* at 86:6–87:4, 245:3–22; 247:11–24, 248:19–24; 255:14–256:7, 247:11–16; *see also* Doc. 183-6 at 96:11–14; 110:2–7; 114:12–17; 118:6–14; 209:21–22; 211:2–8.

in closer proximity to Morris’ house than” this tower. *Id.* There are also geologic obstacles between the Home Tower and Morris’s house that would impede connection. *Id.* Based on this information, Defendants’ cell records expert concluded that “Dorworth arrived at [h]is home within a few minutes after 07:17 PM and remained there until at least 11:05 AM on 7/16/2017” and “it is doubtlessly not feasible for Dorworth’s phone to connect to the Home Tower while at Morris’s house.” *Id.* at 11. Although Dorworth said he would retain an expert to examine the cell phone data, Doc. 183-6 at 97:20–23, he did not do so. His expert deadline of September 3, 2024, came and went without any expert disclosures. Doc. 51 at 2.

This un rebutted, objective evidence places Dorworth at home during the party, showing both that Dorworth lied to investigators about his whereabouts on July 15th and that Dorworth has repeatedly maintained that lie under oath in this case.¹⁵

VIII. Facing a Rule 11 motion and overwhelming evidence he lied under oath, Dorworth dismissed this action—but not before deposing Andrew and Susan Greenberg in bad faith.

On August 17, 2024, Andrew, Susan, and Abby Greenberg and AWG, Inc. served a Rule 11 motion on Dorworth, giving him until September 10, 2024 to avoid a Rule 11 motion by dismissing his frivolous claims. Ex. 18. Further, on September 3, 2024, B.G. signed an affidavit—cited above—stating that “ [REDACTED]

¹⁵ This evidence fits other evidence that Dorworth knew—in direct contrast with his sworn allegations—exactly who A.B. was long before Joel was indicted. For example, an April 3, 2020 text chain produced in discovery shows that [REDACTED]

[REDACTED]

[REDACTED] and that “[REDACTED]
[REDACTED].” Ex. 2 ¶¶ 13, 16. Dorworth had earlier testified that B.G.
[REDACTED]
[REDACTED] Doc. 183-5 at 285:2–9. Thus, by September 3, 2024, Dorworth
was facing a Rule 11 motion based in large part on objective cell phone location evi-
dence disproving his sworn testimony and an affidavit from an admittedly independent
third party [REDACTED]

Even so, on September 4th and 5th, Dorworth’s counsel deposed Andrew and Susan Greenberg, respectively. And at 7:27 p.m. the night before Andrew’s deposition, Dorworth’s counsel emailed counsel for the Greenbergs stating, “I just filed a ... cross notice of deposition in the state court fraudulent transfer case for the deposition tomorrow.” Ex. 20 at 1. The cross notice called for deposing Andrew Greenberg on topics for Dorworth’s separate, state court fraudulent transfer action—which had not yet been served on any defendant. *Compare* Ex. 21 (state court notice), *with* Ex. 22 (federal notice). Plainly—already planning to dismiss to avoid sanctions—Dorworth pressed ahead with the Greenbergs’ depositions to support an equally-frivolous state court action before that complaint was served and before discovery had opened in that case. Indeed, on September 5th, Dorworth voluntarily dismissed this action. Doc. 185.

On September 9, 2024, Dorworth amended his state court case—adding claims for false report of criminal conduct, witness tampering, defamation, and conspiracy. *See generally* Ex. 24. Dorworth’s new complaint abandons all claims against Abby

Greenberg and the Greenberg Dental entities and also abandons his Florida RICO claims in their entirety. Still, incredibly, Dorworth *continues* to claim “[u]pon information and belief” that the Greenbergs paid A.B.’s attorney’s fees and goes so far as to claim *his* attorney’s fees in this action as damages. *Id.* ¶¶ 78–79.

That Dorworth continues to assert a debunked theory on “information and belief” that has been disproven through 16 months of litigation, eight depositions, approximately 75 non-party subpoenas, extensive written discovery, and thousands of documents emphasizes that he possesses *zero* evidence that Andrew and Susan Greenberg did *anything* other than pay their child’s attorney’s fees—something even Dorworth said [REDACTED]. Doc. 183-6 at 12:21–13:2 [REDACTED] [REDACTED]).¹⁶

In sum, Dorworth pleaded that Andrew and Susan Greenberg (i) agreed to pay A.B., Doc. 62 ¶¶ 27, 29, 92–93, 105, 126, 154, 294, 299–300, 312, 324 (ii) had knowledge of the content of Joel’s proffers, *id.* ¶¶ 140–43, 308–09, 325, (iii) paid Joel’s restitution for some nefarious purpose, *id.* ¶¶ 232, 388–97, and (iv) bribed Abby for false testimony, *id.* ¶¶ 126, 154, 294, 312, 324. But Dorworth has discovered zero

¹⁶ There was also affirmative evidence demonstrating that Abby Greenberg never conspired against Dorworth. For example, Abby Greenberg attested in interrogatory answers that she never met A.B. and has never spoken to A.B. A.B. likewise testified that she has never met or communicated with Abby Greenberg. *See* Ex. 1 at 29:2–6. Abby Greenberg also attested that she never testified before a grand jury. And on the two occasions that Abby Greenberg spoke to law enforcement investigating Joel Greenberg, Abby 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 facts and circumstances arising out of and/or relating to the July 15, 2017 party at the Dorworth Residence. *See* Ex. 23 at 35. In turn, because Abby never provided the government with the testimony Dorworth claims she did, Andrew and Susan’s payments to her were not bribes for false testimony.

evidence that Andrew or Susan agreed with anyone to obstruct justice.¹⁷ Dorworth has discovered zero evidence that Andrew or Susan sought to influence anyone's testimony—either by paying A.B.'s attorneys either directly or indirectly, by paying Joel's legal fees or restitution, or by providing financial support to Abby (and their grandchildren). Dorworth has discovered zero evidence that Defendants knew of Joel's proffers relating to Dorworth or of AB's existence. Dorworth has discovered zero evidence that Defendants agreed with anyone to extort Dorworth through any means. And Dorworth has discovered zero evidence that Defendants agreed to or sought to provide *any* false information about Dorworth to *anyone* at *any* time, or even had knowledge of *anyone* doing so. Dorworth's claims were frivolous both when he filed and now. Defendants thus seek a finding of entitlement to attorney's fees and costs and sanctions against Dorworth.

MEMORANDUM OF LAW

Through two salaciously abusive complaints, Dorworth sought millions in treble damages based on conspiracy theories and lies. Then, facing irrefutable evidence

¹⁷ While hard to believe, Dorworth's RICO conspiracy claims against the Greenberg Dental entities are even more contrived than his claims against the other Defendants. He alleges that "any funding required for" actions taken by Andrew and Susan Greenberg "came from AWG and/or Greenberg Dental with the knowledge of what the funding would be used for." See Doc. 62 ¶¶ 25, 308; see also Doc. 183-6 at 182:6-8 [REDACTED]

[REDACTED]. However, Dorworth has adduced no evidence at all to support his allegations that Greenberg Dental has any connection whatsoever to Joel Greenberg besides the name "Greenberg" or that Greenberg Dental ever paid any money to facilitate Joel Greenberg's defense in his criminal case. Doc. 183-5 at 187:2-6, 192:6-14, 193:5-8, 195:24-25. Additionally, there is no record evidence that anyone acting on behalf of Greenberg Dental ever conspired with anyone to do anything that injured Dorworth in any way.

of his lies (presented in a Rule 11 motion) Dorworth dismissed his entire frivolous case and RICO claims. Defendants are thus entitled to their reasonable fees and costs under at least two fonts. *First*, Andrew, Susan, and Abby Greenberg are entitled to fees under Florida's RICO statute. *Second*, Defendants are entitled to fees as a sanction under the Court's inherent power. Finally, Defendants are entitled to a dismissal with prejudice as a sanction under the Court's inherent power.

I. Andrew, Susan, and Abby Greenberg are entitled to fees under Florida's RICO statute as Dorworth's claim lacked substantial fact or legal support.

Count IV of Dorworth's amended complaint asserted a Florida law RICO conspiracy theory against "all individual Defendants." Doc. 62 at 54–55. Florida's RICO statute entitles defendants to fees and costs when a plaintiff brings a claim "without substantial fact or legal support." § 772.104(3), Fla. Stat. This "less stringent standard" serves to "discourage frivolous Rico claims." *Miller*, 681 So. 2d at 302. To award fees and costs under § 772.104(3), the Court need not "find a complete absence of a justiciable issue of either law or fact." *Id.* at 302 (quotation omitted). Rather, the Court need only find that Dorworth's claim lacked substantial fact or legal support.

Further, Defendants need not rebut the possibility that future evidence *could have* substantially supported Dorworth's claims, as the absence of support is measured from the point of dismissal. *See Nodal v. Infinity Auto Ins. Co.*, 50 So. 3d 721, 724 (Fla. 2d DCA 2010) (applying an identical standard and stating, "[i]f ... a plaintiff chooses to voluntarily dismiss its suit at a point when no record evidence supports the factual or legal basis [for the claim], then a defendant is entitled to recover attorney's fees and

costs expended in challenging the action.”).

Importantly, Defendants can make this showing even after a voluntary dismissal. As a matter of federal law, the Court has jurisdiction to consider this motion. *See Cooter & Gell v. Hartmax Corp.*, 496 U.S. 384, 395–96 (1990) (explaining that “it is well established that a federal court may consider collateral issues after an action is no longer pending,” including awarding costs and attorney’s fees); *Shelton v. Schar*, No. 5:17-CV-86-OC-PGBPRL, 2018 WL 3636698, at *1–3 (M.D. Fla. Apr. 23, 2018) (citing *Cooter & Gell* and rejecting argument that the Court lacked jurisdiction to consider a post notice of voluntary dismissal motion for fees under § 772.104(3)). Separately, as a matter of Florida law, Defendants can show that Dorworth’s claim lacked support even “after [Dorworth’s] voluntary dismissal of the claim.” *Royal Palm Vill.*, 2021 WL 4452898, at *5.

With that in mind, Dorworth’s RICO conspiracy claim plainly lacked substantial fact or legal support and would have failed under almost any standard. Most basically, Dorworth premised his case on a perjurious lie: that he was not home on the night of July 15, 2017 and that he had never met or partied with A.B. In response to this motion, Dorworth will likely assert that factual disputes exist as to whether his statements were false—they don’t. But for argument’s sake, straining to give Dorworth’s testimony a non-perjurious interpretation, the best he can offer is that he does not believe he was at the July 15, 2017 party and does not know if A.B. was there. That would not constitute a substantial factual basis supporting his claim. Nor would Dorworth’s self-serving amnesia rebut the testimony of the young women that have

sworn he was there and did meet A.B.

Still, that question should not distract the Court from the larger issue under Florida's RICO statute: whether there was a substantial fact or legal basis for Dorworth's claim. Even if Dorworth did not attend the party (objective evidence shows he did) and even if he never met A.B. (he did), there is still no evidence supporting his RICO claim. Nothing shows that Defendants bribed A.B.—indeed, unrebutted evidence shows that [REDACTED]. Nothing shows that Defendants bribed Abby. Nothing shows that Defendants had any knowledge regarding the content of Joel's proffers. And nothing shows that Defendants agreed to anything. In other words, Defendants ask that the Court not miss the forest for the trees. The simple fact is that there was never evidence supporting Dorworth's RICO claims.

To prove a RICO conspiracy, a plaintiff must prove that the defendants either “agreed to the overall objective of the conspiracy” or “agreed to commit two predicate acts.” *Am. Dental Ass'n v. Cigna Corp.*, 605 F.3d 1283, 1293 (11th Cir. 2010).¹⁸ Over almost a year and a half of discovery—wherein Plaintiff served over 40 separate sets of written discovery requests across all defendants and deposed 4 alleged members of the conspiracy—Dorworth discovered zero evidence that any defendant agreed to make false statements about Dorworth, to bribe or encourage any other defendant to make false statements about Dorworth, or to finance any other Defendant's efforts to

¹⁸ See *Omnipol, A.S. v. Multinational Def. Servs., LLC*, 32 F.4th 1298, 1308 (11th Cir. 2022) (“[T]he analysis of both the federal and state RICO claims is the same.”).

make false statements about Dorworth. Indeed, all Dorworth could ever hang his hat on was his claim that Defendants paid Searle to guide A.B.'s testimony. But that evaporated when Searle confirmed that he met A.B. once, that he was never paid for that meeting, and that he was never contacted by any defendant other than A.B. Ex. 9 ¶¶ 7–10. Indeed, Dorworth conceded that—at the time he dismissed this action—he lacked any evidence supporting his claim that the Greenbergs bribed A.B. when he again alleged that they did so “[u]pon information and belief” in his post-dismissal state court complaint. Ex. 24 ¶ 79. Dorworth similarly conceded his entire RICO conspiracy claim had no basis in fact or law when he dismissed this action in the face of a pending Rule 11 motion and then dropped any allegation that Defendants violated Florida’s RICO act when repleading his claims in state court. *See generally* Ex. 24; *cf. Derek Runion v. Bernard*, No. 2:20-CV-718-JLB-MRM, 2022 WL 18492498, at *5, *7 (M.D. Fla. Jan. 17, 2022) (finding fee entitlement under an identical standard when the plaintiff “abandoned [the] claim in response to Defendants’ motion to dismiss the amended complaint”). He further conceded the frivolity of his claims against the Greenberg Dental entities and Abby Greenberg when he dropped them from his new action completely. *See* Ex. 24.

And rather than suggesting conspiracy, unrebutted testimony shows that investigators targeted Dorworth when A.B. independently implicated him and Joel and others in having sex with her as a minor; then, the dominoes continued to fall when a host of young women testified about a July 15, 2017 sex party at Dorworth’s home. Objective, unrebutted, evidence shows that Dorworth and then-age-17 A.B. were present at

that party at Dorworth's home on July 15, 2017; that Dorworth (reflecting his guilt) obstructed the investigation into his and Gaetz's misconduct by [REDACTED]

[REDACTED] Then, repeating the same lies he told investigators, Dorworth filed this suit in bad faith to preempt a potential lawsuit from A.B. for sex trafficking and statutory rape. Because Dorworth's claim was without substantial basis in fact or law, Andrew, Susan, and Abby Greenberg are entitled to their reasonable fees under § 772.104(3), Fla. Stat.

II. Defendants are entitled to fees and dismissal with prejudice under this Court's inherent powers because Dorworth brought and maintained this action in bad faith.

Under its inherent powers, the Court may impose sanctions for "bad faith," vexatious, wonton, or "oppressive" behavior, *Chambers*, 501 U.S. at 44–46, even after a voluntary dismissal of the underlying case, *see Irish*, 962 F.3d at 1310 ("[A] district court may address a sanctions motion based on its inherent powers ... even if it lacks jurisdiction over the underlying case."); *Haviland v. Specter*, 561 F. App'x 146, 150 (3d Cir. 2014); *see also Fid. Land Tr. Co., LLC v. Mortg. Elec. Registration Sys., Inc.*, No. 6:12-CV-1367-ORL-37, 2012 WL 6720994, at *3 (M.D. Fla. Dec. 4, 2012) (recommending that the court grant a motion for sanctions under the Court's inherent power filed *after* a notice of voluntary dismissal). To impose such sanctions, the Court must find that the sanctioned party acted in "subjective bad faith." *Irish*, 962 F.3d at 1310 (emphasis deleted). Permissible sanctions include fees and dismissal with prejudice. *Chambers*, 501 U.S. at 45–46 (fees); *Obukwelu*, 837 F. App'x at 687–88 (dismissal). Relevant here,

even when a party has voluntarily dismissed their claim, the Court may convert that dismissal into one with prejudice as a sanction because doing so does “not require a determination on the merits.” *Zow*, 595 F. App’x at 888.¹⁹

The Court should sanction Dorworth under its inherent power because the “record demonstrates that [he] acted willfully and in bad faith” by failing, “multiple times, to truthfully respond in interrogatories[,] ... sworn depositions,” and verified complaints. *Obukwelu*, 837 F. App’x at 689.²⁰ In two verified complaints, a response to a request for admission, two days of deposition testimony, and an unverified interrogatory response, Dorworth lied that he was not home the night of July 15, 2017 and that he had never met A.B. Worse still, those lies represented a continuation of [REDACTED] [REDACTED] in an attempt to obstruct a criminal investigation.²¹

Dorworth further lied when he claimed, for example, that [REDACTED] *Compare* Doc. 183-5 at 356:10 (Dorworth testifying that [REDACTED] [REDACTED] with Doc. 183-2 ¶¶ 24–27 (L.P. averring that she attended multiple parties at the Dorworth Residence in the summer of 2017,

¹⁹ On its own motion, the Court could also order Dorworth to show cause under Federal Rule of Civil Procedure 11(c)(3) why his voluntary dismissal should not be converted to a dismissal with prejudice as a non-monetary sanction under Federal Rule of Civil Procedure 11(c)(4). *See Johnson v. 27th Ave. Caraf, Inc.*, 9 F.4th 1300, 1315 (11th Cir. 2021) (“[W]here the client has made a knowing factual misrepresentation or is the mastermind behind the frivolous case, [Rule 11] sanctions against a client are appropriate.” (quotations omitted)).

²⁰ As further evidence of Dorworth’s bad faith, Defendants note that this frivolous action is part of an ongoing pattern of abusive litigation. In a separate case before the Court, Judge Conway found that Dorworth’s claims were “completely unreasonable, groundless, and bordering on bad faith.” Ex. 26 at 45.

²¹ For the Court’s benefit, Defendants have also created a compendium of Dorworth’s false statements. Ex. 27.

one of which included a sexual encounter with Dorworth). And even after receiving a Rule 11 letter, Dorworth then served interrogatory responses doubling down on his lies. *See* Ex. 25. Dorworth also caused his wife to verify false statements under oath in his amended verified complaint. *See* Doc. 181-1 at 33:18–24. And he watched without intervening when she repeated those lies during her deposition.

Even still, faced with irrefutable evidence that he had perjured himself, Dorworth refused to abandon his crusade against Andrew and Susan Greenberg. Recycling many of his original allegations, Dorworth’s new state court complaint incredibly *continues* to allege that the Greenbergs are liable to him because they financed false testimony against him—though now apparently alleging in the alternative that such aid may have been negligent. Ex. 24 ¶¶ 38–55. *But see Carney v. Gambel*, 751 So. 2d 653, 654 (Fla. 4th DCA 1999) (“No Florida decision has imposed liability upon the parents of an adult child for intentional acts simply because the child may be financially dependent on ... his or her parents.”). Elsewhere, Dorworth suggests that campaign donations may give rise to liability. Ex. 24 ¶ 41. But the former speaker designate of the Florida House, Doc. 1-1 ¶ 6, surely knows that such contributions are constitutionally protected, *see McCutcheon v. Fed. Election Comm’n*, 572 U.S. 185, 191 (2014) (noting the First Amendment guarantees “[t]he right to participate in democracy through political contributions”). Perhaps most incredibly, Dorworth *again* alleges “[u]pon information and belief” that the Greenbergs paid A.B.’s attorney’s fees, *id.* ¶ 79, and goes so far as to claim *his* fees from this action as damages, *id.* ¶ 78, and claims entitlement to punitive damages, *id.* ¶ 81.

Dorworth has demonstrated total contempt for the judicial system. At the outset of the government’s investigation into Joel, Dorworth lied to ██████ to protect himself and his friends. Then, seeking millions of dollars in damages, he turned those same lies against the Greenbergs. After lying in his very first filing, Dorworth went on to lie at every stage of this litigation. And when finally confronted with irrefutable evidence that he lied, Dorworth simply dismissed this action and is now *repeating* his false allegations in another court. Dorworth’s actions epitomize subjective bad faith. The Court should now act to ensure that bad faith litigants like Dorworth cannot freely twist the Court’s power to his own illegitimate ends—defiling “the very temple of justice”—and then get away with impunity. *Chambers*, 501 U.S. at 46. The Court should therefore employ its inherent power to defend the judicial process’s legitimacy by ordering Dorworth to pay Defendants’ fees incurred in defending this frivolous action and by converting his dismissal without prejudice into one with prejudice.

CONCLUSION

For the above reasons, the Court should grant the Defendants’ motion for entitlement to fees and costs and convert Dorworth’s dismissal into one with prejudice.

LOCAL RULE 3.01(g) CERTIFICATION

Counsel for the Greenbergs conferred with counsel for Dorworth regarding this motion by video teleconference on September 13, 2024 and by email on September 18, 2024 and September 19, 2024. Plaintiff opposes the requested relief.

Dated: September 19, 2024

Respectfully submitted,

/s/ Frederick S. Wermuth

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 19, 2024 I electronically filed the fore-
going with the Clerk of the Court by using the CM/ECF system, which will send a
notice of electronic filing to all counsel of record.

/s/ Frederick S. Wermuth

Frederick S. Wermuth
Florida Bar No. 0184111

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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| <p>March 17, 2021</p> | <p>Abby: No</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> |

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| | <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> |

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| | <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> |

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| <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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> |

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| | <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:

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| 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█████ M█████ at ¶11. In that connection, please see the excerpts from the affidavit of K█████ M█████ below:

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

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

It appears from the affidavit of Ms. M█████ 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█████ M█████ 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 |

| | | | |
|----------------------|---|--|--|
| <p>March 3, 2021</p> | <p>Abby Greenberg; Joel Greenberg; and Seminole County Sheriff's Office</p> | <p>Report of domestic disturbance involving Joel Greenberg wherein Joel Greenberg was arrested and taken into custody by authorities</p> | <p>Police report; and arrest records none of which are in the possession, custody, and/or control of Defendant, Abby Greenberg</p> |
|----------------------|---|--|--|

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.

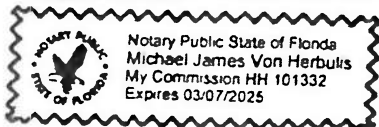
VERIFICATION PAGE

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.