

IN THE SUPREME COURT OF THE STATE OF FLORIDA

NOEL THOMAS PATTON, et al.,

CASE NO.: SC05-667  
L.T. CASE NO. 5D03-1968

Petitioners,

vs.

KERA TECHNOLOGY, INC., GEORGE  
CHENG-HAO HUANG, GABRIEL SIMON,  
and UNIDATA, INC.

Respondents.

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**ANSWER BRIEF ON JURISDICTION OF RESPONDENTS  
KERA TECHNOLOGY, INC. AND GEORGE CHENG-HAO HUANG**

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Respectfully submitted,

/s/ JOHN S. SCHOENE  
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**NOTICE OF ADOPTION OF ANSWER BRIEF ON JURISDICTION  
OF RESPONDENT GABRIEL SIMON**

Respondents, KERA TECHNOLOGY, INC. and GEORGE CHENG-HAO HUANG, by and through their undersigned counsel, with the consent of Respondent, GABRIEL SIMON, hereby incorporate and adopt in full the Answer Brief on Jurisdiction of Respondent Gabriel Simon previously filed herein.

Respectfully submitted,

/s/ JOHN S. SCHOENE  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy hereof has been mailed this 17<sup>TH</sup> day of June, 2005 to: Todd M. Hoepker, Esq., P.O. Box 3311, Orlando, FL 32802-3311, J. Marbury, Esq., 1500 Marquis Two Tower, 285 Peachtree Center Avenue, NE, Atlanta, GA 30303 and Kenneth Mann, Esq., P.O. Box 551, Orlando, FL 32802-0551.

/s/ JOHN S. SCHOENE  
JOHN S. SCHOENE, ESQUIRE  
JOHN S. SCHOENE, P.A.  
Florida Bar No.: 313203

**CERTIFICATE OF COMPLIANCE**

Undersigned counsel hereby certifies that this Notice of Adoption of Answer Brief on Jurisdiction of Respondent Gabriel Simon complies with the font requirements of Rule 9.210 of the Florida Rules of Appellate Procedure.

/s/ JOHN S. SCHOENE  
JOHN S. SCHOENE