

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA**

NED KIMMELMAN,

CASE NO.: 2025-CA-11366

Plaintiff,

v.

SAVE BOCA, INC., a Florida non-profit corporation; JONATHAN PEARLMAN; CITY OF BOCA RATON, FLORIDA; and WENDY LINK as the PALM BEACH COUNTY SUPERVISOR OF ELECTIONS,

Defendants.

DEFENDANT SUPERVISOR OF ELECTIONS'S ANSWER TO COMPLAINT

Defendant WENDY LINK as the PALM BEACH COUNTY SUPERVISOR OF ELECTIONS ("**Defendant**" or "**Supervisor Link**"), answers Plaintiff's Complaint and states as follows:

1. Defendant is without sufficient knowledge as to the allegations of paragraph 1, and therefore these allegations are denied and strict proof is demanded thereof.
2. Defendant is without sufficient knowledge as to the allegations of paragraph 2, and therefore these allegations are denied and strict proof is demanded thereof.
3. As to the allegations of paragraph 3, admitted.
4. As to the allegations of paragraph 4, admitted.
5. Defendant is without sufficient knowledge as to the allegations of paragraph 5, and therefore these allegations are denied and strict proof is demanded thereof.
6. Defendant is without sufficient knowledge as to the allegations of paragraph 6, and therefore these allegations are denied and strict proof is demanded thereof.

7. Defendant is without sufficient knowledge as to the allegations of paragraph 7, and therefore these allegations are denied and strict proof is demanded thereof.

8. Defendant is without sufficient knowledge as to the allegations of paragraph 8, and therefore these allegations are denied and strict proof is demanded thereof.

9. Defendant is without sufficient knowledge as to the allegations of paragraph 9, and therefore these allegations are denied and strict proof is demanded thereof.

10. Defendant is without sufficient knowledge as to the allegations of paragraph 10, and therefore these allegations are denied and strict proof is demanded thereof.

COUNT I
(INJUNCTIVE RELIEF)

11. As to Count I (Injunctive Relief), Supervisor Link has been sued in her official capacity as the Palm Beach County Supervisor of Elections and is not alleged to have committed any wrongdoing.

12. The allegations contained in Count I (Injunctive Relief) - Paragraphs 11-39 of Plaintiff's Complaint are not addressed to Supervisor Link, and therefore Supervisor Link is not required to respond to same. However, to the extent these allegations could be construed against Supervisor Link, she specifically denies same and strict proof is demanded thereof.

13. As to Plaintiff's prayer for relief set forth at the conclusion of Plaintiff's allegations, (pages 10 and 11 of Plaintiff's Complaint), Plaintiff's demands for remedy and relief described in paragraphs 1(a), 1(b), and 4 of are not addressed to Supervisor Link. However, to the extent these demands require compliance by Supervisor Link, she takes no position and stands ready to comply with any lawful order.

14. As to Plaintiff's prayer for relief set forth at the conclusion of Plaintiff's allegations, (pages 10 and 11 of Plaintiff's Complaint), Supervisor Link takes no position and stands ready to

comply with any lawful order pertaining to Plaintiff's demands for remedy and relief described in paragraphs 1(c), 1(d), 2 and 3.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY on November 14, 2025, this document has been furnished electronically via the Florida Court's E-Portal to: Ned Kimmelman, Esq., at nk@nkpa.com and nkimmelman@icloud.com; Samuel Zeskind, Esq., at szeskind@wsh-law.com, tjames@wsh-law.com; and Daniel L. Abbott, Esq., at dabbott@wsh-law.com and pgrotto@wsh-law.com.

Respectfully submitted,

JECK HARRIS

*Attorneys for Defendant Wendy Link as the
Palm Beach County Supervisor of Elections*
790 Juno Ocean Walk, Suite 600
Juno Beach, Florida 33408
Telephone: (561) 746-1002

By: /s/ David R. Glickman
DAVID K. MARKARIAN, ESQ.
Florida Bar No. 480691

dmarkarian@jeckharris.com
DAVID R. GLICKMAN, ESQ.
Florida Bar No. 118685
dglickman@jeckharris.com
E-SERVICE: eservice@jeckharris.com