

IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO. 12-24051 (07)
COMPLEX LITIGATION UNIT

MATTHEW CARONE, as Trustee for the Carone
Marital Trust #2 UTD 1/26/00, Carone Gallery, Inc.
Pension Trust, Carone FamilyTrust, Carone Marital
Trust #1 UTD 1/26/00 and Matthew D. Carone
Revocable Trust, JAMES JORDAN, as Trustee for
the James A. Jordan Living Trust, ELAINE ZIFFER,
an individual, and FESTUS AND HELEN STACY
FOUNDATION, INC., a Florida Corporation,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, individually,

Defendant.

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NOTICE OF FILING:

EMAIL FROM HELEN DAVIS CHAITMAN DATED FEBRUARY 6, 2014

Philip J. Von Kahle, as Conservator for P&S, General Partnership and S&P, General
Partnership, by and through counsel, hereby gives notice of filing the attached *Email from Helen
Davis Chaitman Dated February 6, 2014* in the above-styled matter.

Respectfully submitted this February 6, 2014.

MESSANA, P.A.
Attorneys for Conservator
Post Office Drawer 2485
Fort Lauderdale, FL 33303
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By: /s/ Thomas M. Messana

Thomas M. Messana
Florida Bar No. 991422

From: Carol Fox [REDACTED]
Sent: Thursday, February 06, 2014 1:53 PM
To: Chaitman, Helen Davis
Cc: Gorchkova, Julie; blanco@bplegal.com; Kent Fox
Subject: FW: In re Madoff, P&S / S&P - Breeden (MVF) claim & representation forms signature pages

Dear Ms. Chaitman,

Effective today, I wish to terminate our retainer agreement for cause I believe your conflict of interest with respect to your representation of the S&P General Partnership and my family as investors in the same extended far beyond the bounds of your disclosed representation of both net winners and net losers in the Madoff case. I have downloaded and completed the claim forms relating to the Madoff Victims Fund on behalf of the Fox Family Partnership and Barbara B. Fox, Trustee as indirect investors in BLMIS. The signature forms for direct investors will be provided to Mr. Von Kahle, the court-appointed Conservator of S&P General Partnership. To reiterate, you do not have the permission of the Fox Family Partnership or Barbara B. Fox, Trustee to represent us in this matter. At your earliest convenience, please provide me with any documents we may need to sign or prepare in order to formally terminate our relationship.

Thank you.

Best regards,

Carol Fox
[REDACTED] (cell)

From: Carol Fox [REDACTED]
Sent: Thursday, February 06, 2014 1:29 PM
To: Carol Fox
Subject: Fwd: In re Madoff, P&S / S&P - Breeden (MVF) claim & representation forms signature pages

Sent from my iPhone

Begin forwarded message:

From: "Chaitman, Helen Davis" <hchaitman@bplegal.com>
Date: February 6, 2014 at 12:46:11 PM EST
To: "Chaitman, Helen Davis" <hchaitman@bplegal.com>, "Gorchkova, Julie" <JGorchkova@bplegal.com>, "Blanco, Lourdes" <blanco@bplegal.com>
Subject: In re Madoff, P&S / S&P - Breeden (MVF) claim & representation forms signature pages

Dear Friends:

As a net loser, you may be entitled to receive money from the Madoff Victims Fund. I will be filing the claim forms for you as part of our retainer

agreement. There will be no additional charge for this. Please be good enough to print out, sign, and return to me by mail the attached claim signature form (page 12) and representation form (page 3). We will email you the claim form for your approval before we file it and we will attach your original signature pages. Mr. Von Kahle should not be filing for you; the money should be paid directly to you as the customer.

Helen Davis Chaitman

Attorney at Law

Becker & Poliakoff

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