

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

CASE NO.: 12-034123(07)

P & S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited
Partnership, *et al*,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**RE-NOTICE OF DEPOSITION OF THE CORPORATE REPRESENTATIVE OF
FESTUS & HELEN STACY FOUNDATION, INC.**

PLEASE TAKE NOTICE that the undersigned counsel will take the deposition of:

Deponent: Festus & Helen Stacy Foundation, Inc., through its corporate
representative with the most knowledge concerning the topics listed in
the attached Schedule A.

Date: March 2, 2016

Time: 9:30 A.M.

Place: Broad and Cassel
1 Financial Plaza, #2700
Fort Lauderdale, FL 33394

upon oral examination before a Notary Public or other officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under applicable Florida Rules of Civil Procedure.

KINDLY GOVERN YOURSELF ACCORDINGLY.

EXHIBIT A

Definitions

1. “You” or “Your” shall mean the Festus & Helen Stacy Foundation, Inc., its directors, officers or agents.
2. “P&S/S&P” shall mean P&S Associates General Partnership and/or S&P Associates General Partnership.

Issues

1. Books and records of P&S/S&P which You reviewed in or about 2008;
2. Any report, memo, analysis or review prepared as a result of the review identified in Items 1 and/or 4;
3. Referral fees, commissions, management fees, gifts, charitable contributions and/or kickbacks You received or which were credited to Your accounts with P&S/S&P;
4. The review of the books and records of P&S/S&P in or about November 2011 by Ali Ansari;
5. The transfer of the books and records of P&S/S&P from You and/or Your agents to Margaret Smith;
6. The issues and facts raised by the pleadings in the attached Fifth Amended Complaint.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of February, 2016, the foregoing document is being served on those on the attached service list by electronic service via the Florida Court E-Filing Portal in compliance with Fla. Admin Order No. 13-49.

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