

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.

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**SECOND RE-NOTICE OF DEPOSITION OF THE CORPORATE  
REPRESENTATIVE OF FESTUS & HELEN STACY FOUNDATION, INC.**  
(Changes Location Only)

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: Genovese, Joblove & Battista  
200 E. Broward Blvd., Suite 1110  
Ft. Lauderdale, FL 33301

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.

**HAILE, SHAW & PFAFFENBERGER, P.A.**

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