

**IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT, IN  
AND FOR BROWARD COUNTY, FLORIDA**

CASE NO. 12-034123 (07)

P&S ASSOCIATES, GENERAL PARTNERSHIP,  
a Florida limited partnership; and S&P  
ASSOCIATES, GENERAL PARTNERSHIP, a  
Florida limited partnership, PHILIP VON KAHLE  
as Conservator of P&S ASSOCIATES, GENERAL  
PARTNERSHIP, a Florida limited partnership, and  
S&P ASSOCIATES, GENERAL PARTNERSHIP,  
a Florida limited partnership

Plaintiffs,

v.

MICHAEL D. SULLIVAN, an individual,  
STEVEN JACOB, an individual, MICHAEL D.  
SULLIVAN & ASSOCIATES, INC., a Florida  
corporation, STEVEN F. JACOB, CPA &  
ASSOCIATES, INC., a Florida corporation,  
FRANK AVELLINO, an individual, MICHAEL  
BIENES, an individual, VINCENT BARONE, an  
individual, and PREMIER MARKETING  
SERVICES, INC., a Florida Corporation,

Defendants.

**PLAINTIFFS' NOTICE OF TAKING ONE-HOUR  
DEPOSITION OF DEFENDANT FRANK AVELLINO**

**TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE**

**PLEASE TAKE NOTICE** that the undersigned attorneys will take the deposition of:

| Deponent       | Date                       | Time                  | Location  |
|----------------|----------------------------|-----------------------|---|
| FRANK AVELLINO | Wednesday<br>March 9, 2016 | 3:00 p.m.<br>[1 hour] | Berger Singerman LLP<br>One Town Center Road<br>Suite 301<br>Boca Raton, FL 33486 |

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Said deposition will be taken before a Notary Public or any officer authorized to administer oaths in the State of Florida, and a person who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in this action. The deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.

Respectfully submitted,

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cc: Empire Legal Reporting

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of March, 2016, a true and correct copy of the foregoing document was served on the following parties:

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