

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

CASE NO: 12-34121(07)

Complex Litigation Unit

PHILIP J. VON KAHLE, as Conservator of
P&S ASSOCIATES, GENERAL PARTNERSHIP,
and S&P ASSOCIATES, GENERAL PARTNERSHIP,

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE TRUST, *et al*,

Defendants. _____/

**PLAINTIFFS' RE-NOTICE OF TAKING DEPOSITION OF DEFENDANT
HOLY GHOST FATHERS HG – MOMBASA VIA VIDEOCONFERENCE**

TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE

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

Deponent	Date	Time	Location
Holy Ghost Fathers HG-Mombasa	March 12, 2014	9:00 a.m. (Eastern Standard Time)	LK Shields 40 Upper Mount Street, Dublin 2 Ireland

*Plaintiff's counsel will appear via live videoconferencing feed

Said videotaped deposition will be taken before a Notary Public or any officer authorized to administer oaths, 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



purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.

The deposition will continue from day to day until completed and will be recorded via stenographic means.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail upon counsel identified below registered to receive electronic notifications and regular U.S. mail upon *Pro Se* parties this 3rd day of March, 2014 upon the following:

Notice has been electronically mailed to:

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By: s/Steven D. Weber
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NOTICE TO:
AMERICANS WITH DISABILITIES

This notice is provided pursuant to Administrative Order No. 2.207-9/12

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Germaine English, Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Germaine English, 205 N. Dixie Highway, West Palm Beach, Florida 33401; teléfono número (561) 355-4380, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedisa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte Germaine English, kòdonatè pwogram Lwa pou ameriken ki Enfim yo nan Tribinal Konte Palm Beach la ki nan 205 North Dixie Highway, West Palm Beach, Florida 33401; telefòn li se (561) 355-4380 nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”

EXHIBIT A

I. DEFINITIONS:

A. “You”, “Your”, or “Defendant” as used herein means Defendant Holy Ghost Fathers HG-Mombasa and includes any and all agents, employees, servants, officers, directors, attorneys and any other person or entity acting or purporting to act on its behalf.

B. “P&S” as used herein means Plaintiff P&S Associates, General Partnership, and includes any and all agents, employees, servants, officers, directors, attorneys and any other person or entity acting or purporting to act on its behalf.

C. The conjunctions “and” and “or” mean “and/or” so as to encompass the broader of the two possible constructions, not disjunctively so as to exclude any information.

II. TOPICS:

1. The relationship between You and P&S.
2. Any due diligence performed by You before investing in P&S.
3. The facts and/or circumstances that led to Your investment in P&S.
4. All payments, distributions, and/or transfers of funds between You and P&S.
5. The Demand Letters that You received in November 2012 and October 2013.
6. Communications between You and/or P&S; Michael D. Sullivan; Steven Jacob; Michael D. Sullivan & Associates, Inc., a Florida Corporation; Steven F. Jacob, CPA & Associates, Inc.; Frank Avellino; Michael Bienes; Kelco Foundation, Inc. a Florida Non Profit Corporation; and/or Vincent T. Kelly.
7. The factual allegations of the Amended Complaint in this action.
8. The factual allegations in Your Motion to Dismiss the Amended Complaint and Incorporated Memorandum of Law.

9. The facts and circumstances relating to the allegation that You have disassociated from P&S.
10. Your responses to Plaintiffs' discovery requests.
11. The relationship between You and any other entity with "Holy Ghost" or "Spiritans" in its name.
12. The relationship between You and Vincent T. Kelly and/or Kelco Foundation, Inc.
13. The facts and/or circumstances that led to your withdrawal of funds from P&S.
14. Any subsequent transfers of funds received by you from P&S.
15. The relationship between you and Michael Bienes, Frank Avellino, and/or Avellino & Bienes, CPA.
16. Any inquiries you made as to the financial status of P&S, while you were a partner.

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