

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

PHILIP J. VON KAHLE, as Conservator of
P&S Associates, General Partnership and
S&P Associates, General Partnership
Plaintiffs,

Case No. 12-034123 (07)
Complex Litigation Unit

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**PLAINTIFFS' MOTION FOR AN ORDER GRANTING
APPROVAL OF FILING SETTLEMENT DOCUMENTS UNDER SEAL**

P&S Associates, General Partnership (“P&S”), S&P Associates, General Partnership (“S&P), and Philip J. Von Kahle, as Conservator for P&S and S&P (the “Conservator”) (collectively, the “Plaintiffs”), by and through undersigned attorneys and pursuant to CLP 5.14, hereby move this honorable Court for an Order Granting Approval of Filing Settlement Documents Under Seal (the “Motion”) and in support hereof states as follows:

1. On February 16, 2015, Defendant Michael D. Sullivan filed a Motion to Dismiss/Enforce Settlement (“Motion to Enforce”).

2. In order to properly respond to the Motion to Enforce, Plaintiffs need to cite to provisions of a June 25, 2014 Confidential Settlement Agreement, and intend to attach that Confidential Settlement Agreement to their response. However, the Confidential Settlement Agreement has been deemed confidential, and Plaintiffs cannot file it conventionally without violating its confidentiality provisions.

3. Accordingly, Plaintiffs respectfully request that the Court grant their Motion and permit them to file their response to the Motion to Enforce and the attached Confidential Settlement Motion under seal.

WHEREFORE, Plaintiffs respectfully request that this Court enter an Order (i) Granting Plaintiff's Motion for Order Granting Approval of Filing Settlement Documents Under Seal; (ii) directing the Clerk to maintain the Settlement Documents under seal until further Order of this Court; and (iii) grant such other relief as may be just and proper.

Dated: March 10, 2015

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March, 2015, a true and correct copy of the foregoing document was served on the following parties:

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