

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

CASE NO.: 12-034123 (04)

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

Plaintiffs,

v.

MICHAEL D. SULLIVAN, *et al.*,

Defendants.

**PLAINTIFFS' RESPONSE AND MEMORANDA IN OPPOSITION TO
DEFENDANT MICHAEL BIENES' MOTION TO DISMISS
AND STRIKE THE ALLEGATIONS IN THE AMENDED
COMPLAINT AND/OR MOTION FOR MORE DEFINITE STATEMENT**

Plaintiffs P & S Associates, General Partnership ("P&S"), S & P Associates, General Partnership ("S&P") (collectively, the "Partnerships" or "Plaintiffs"), by and through their undersigned attorneys, file this Response and Memoranda in Opposition to Defendant Michael Bienes' ("Defendant") Motion to Dismiss and to Strike Allegations in the Second Amended Complaint and/or Motion for a More Definite Statement (the "Motion"). In support thereof, Plaintiffs state as follows:

Plaintiffs reincorporate by reference their response to Defendant Frank Avellino's Motion to Dismiss and Strike the Allegations in the Amended Complaint and/or Motion for a More Definite Statement as if set forth in full herein.

Dated: March 24, 2014

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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 on this 24th day of March, 2014, upon the following:

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