

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT OF FLORIDA,  
IN AND FOR BROWARD COUNTY

CASE NO.: 12-034123 (07)

P&S ASSOCIATES, GENERAL  
PARTNERSHIP, etc., et al.,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

---

**DEFENDANT FRANK AVELLINO'S NOTICE OF FILING ANSWERS TO  
PLAINTIFF'S FOURTH SET OF INTERROGATORIES**

Defendant, Frank Avellino, by and through his undersigned counsel, hereby gives notice of filing his objections and answers to Plaintiff's Fourth Set of Interrogatories propounded upon him on February 26, 2016.

I HEREBY CERTIFY that original answers were served by U.S. Mail upon Thomas M. Messina, Esq., and a true and correct copy of the foregoing was served via e-mail upon the all counsel of record on the attached service list this 1st day of April, 2016.

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

*Attorneys for Defendants Frank Avellino and  
Michael Bienes*

660 U.S. Highway One, Third Floor

North Palm Beach, FL 33408

Phone: (561) 627-8100

Fax: (561) 622-7603

[gwoodfield@haileshaw.com](mailto:gwoodfield@haileshaw.com)

[bpetroni@haileshaw.com](mailto:bpetroni@haileshaw.com)

By: /s/ Gary A. Woodfield

Gary A. Woodfield, Esq.

FL Bar No. 563102

SERVICE LIST

THOMAS M. MESSANA, ESQ.  
MESSANA, P.A.  
SUITE 1400, 401 EAST LAS OLAS BOULEVARD  
FORT LAUDERDALE, FL 33301  
[tmessana@messana-law.com](mailto:tmessana@messana-law.com)  
*Attorneys for P & S Associates General Partnership*

LEONARD K. SAMUELS, ESQ.  
ETHAN MARK, ESQ.  
MICHAEL O. WEISZ, ESQ.  
ZACHARY P. HYMAN, ESQ.  
BERGER SINGERMAN  
350 EAST LAS OLAS BOULEVARD, STE 1000  
FORT LAUDERDALE, FL 33301  
[emark@bergersingerman.com](mailto:emark@bergersingerman.com)  
[lsamuels@bergersingerman.com](mailto:lsamuels@bergersingerman.com)  
[mweisz@bergersingerman.com](mailto:mweisz@bergersingerman.com)  
[zhyman@bergersingerman.com](mailto:zhyman@bergersingerman.com)  
[DRT@bergersingerman.com](mailto:DRT@bergersingerman.com)  
[mvega@bergersingerman.com](mailto:mvega@bergersingerman.com)  
*Attorneys for Plaintiff*

PETER G. HERMAN, ESQ.  
THE HERMAN LAW GROUP, P. A.  
1401 E. BROWARD BLVD., STE 206  
FORT LAUDERDALE, FL 33301  
[pgh@thglaw.com](mailto:pgh@thglaw.com)  
*Attorneys for Defendants Steven F. Jacob  
and Steven F. Jacob CPA & Associates, Inc.*