

IN THE CIRCUIT COURT FOR 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

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

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME
TO DESIGNATE EXPERT WITNESS**

Philip J. Von Kahle (the "Conservator"), as Conservator for P&S Associates, General Partnership ("P&S") and S&P Associates, General Partnership ("S&P") (together, the "Partnerships") (the "Plaintiffs"), by and through undersigned attorneys, files this Motion for an Extension of Time to Designate Expert Witness (the "Motion"), and in support thereof states as follows:

1. The Case Management Order in this matter provides that "[P]laintiff[s] shall designate the experts expected to be called at trial and provide all information specified in CPL 7.5 by April 25, 2014."
2. Plaintiffs are still in the process of finalizing engagement of an expert witness, and need a brief two week extension of time, through and including May 9, 2014, to make the disclosures required by the CPL 7.5.
3. In the event that the Court grants the Motion, Plaintiffs will also consent to a two week extension of time for Defendants to make the disclosures required by CLP 7.5.

4. No party will be prejudiced by the relief sought herein.

WHEREFORE the Plaintiffs request that this Court enter an order extending the deadline to designate any expert expected to be called at trial and provide all information specified in CLP 7.5 through and including May 9, 2014, together with such other and further relief as the Court may deem just and appropriate under the circumstances.

Dated: April 25, 2014

MESSANA, P.A.
Attorneys for Conservator
401 East Las Olas Boulevard, Suite 1400
Ft. Lauderdale, FL 33301
Telephone: (954) 712-7400
Facsimile: (954) 712-7401

By: /s/ Thomas M. Messana
Thomas M. Messana, Esq.
Florida Bar No. 991422
Brett D. Lieberman, Esq.
Florida Bar No. 69583