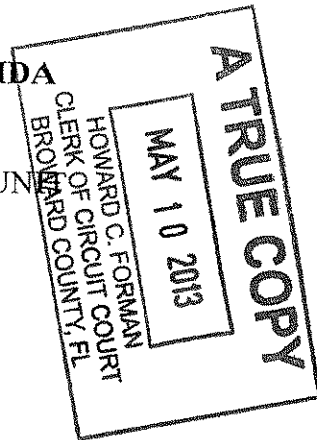


IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL  
CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO. 12-24051 (07)  
COMPLEX LITIGATION UN



MATTHEW CARONE, as Trustee for the Carone Marital Trust # 2 UTD 1/26/00, Carone Gallery, Inc. Pension Trust, Carone Family Trust, Carone Martial Trust #1 UTD 1/26/00 and Matthew D. Carone Revocable Trust, JAMES JORDAN, as Trustee for the James A. Jordan Living Trust, ELAINE ZIFFER as individual and FESTUS AND HELEN STACY FOUNDATION, INC., a Florida corporation,

Plaintiffs,

v.

MICHAEL D. SULLIVAN

Defendant

**OBJECTION RESPONSE TO NOTICE OF INTENT TO ISSUANCE  
OF SUBPOENA UPON GUARDIAN ANGEL TRUST AND  
INCORPORATED MEMORANDUM OF LAW AND INTENT TO  
FILE FOR PROTECTIVE ORDER**

Steven Jacob, ("Jacob") as a 40% partner in interest of the S&P General Partnership ("S&P") and the managing member of Guardian Angel Trust ("Guardian") a limited liability corporation, hereby objects to the issuance of Subpoena upon Guardian Angel Trust LLC and states as follows:

1. Guardian is a general partner in S&P.
2. Guardian invested funds in S&P and is a net loser.
3. Guardian ceased operations on December 11, 2008, and is winding down its operations. Guardian's only asset is its claim in the S&P Partnership.

4. Guardian exerts no control over the operations of S&P.
5. Michael Sullivan does not own, have any authority, position or influence in Guardian.
6. Guardian is not named as a defendant in this litigation.
7. **ALL** documents in existence relating to the money invested in S&P and claim filed by Guardian have already been produced.
8. Guardian has had no dealing with the P&S General Partnership.
9. The individual members of Guardian have a relationship with Guardian and no direct relationship with the Partnership.
10. Members of Guardian have invested in Guardian, LLC for corporate protection, anonymity and to avoid the exposure resulting from being part of a partnership entity.
11. The S&P partnership has no standing to request the names of the members of Guardian, its tax returns or any other information.
12. Jacob has met with the conservator and his council and has repeatedly told and written them that Guardian has no partnership records.
13. **Contrary to the clear instructions of this Court**, no Confidentiality Order has been put in place. The last draft was sent by Jacob to counsel for the Conservator on April 23, 2013. There has been no response from counsel or the conservator.
14. Jacob incorporates by reference its Opposition to the Conservator's Motion To Retain and Compensate Berger Singerman, LLP and Messana, P. A., As Special Litigation Counsel In The Michael D. Sullivan, Et. Al. Matter and Approving the Contingency Fee Compensation Agreement and Conservator's Motion To Retain and

Compensate Berger Singerman LLP, as Special Litigation Counsel In The Janet A. Hooker, Et al. Matter and Approving the Contingency Fee Compensation Agreement.

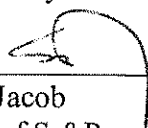
15. These repeated requests and notices waste the TIME AND MONEY of the Partnership, and the Courts. They are unduly burdensome, harassing, embarrassing and attempt to discredit Jacob in violation of the Florida Rules of Civil Procedure 1.280(c).

**RELIEF REQUESTED**

I respectfully request that this Court deny the issuance of subpoena on Guardian Angel Trust, LLC as all information the partnership would be entitled to has been provided and therefore moot. The rights of the members of Guardian Angel Trust must be protected and Guardian Angel Trust will need to file for a protective order, if the Court allows the subpoena to be issued.

May 10, 2013

Respectfully Submitted

  
\_\_\_\_\_  
Steven Jacob  
Partner of S &P

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