

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

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

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.

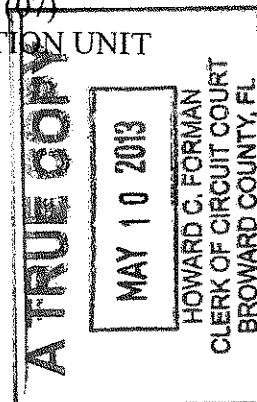
MICHAEL D. SULLIVAN

Defendant

**OBJECTIONS TO NOTICE OF INTENT TO ISSUANCE OF SUBPOENA UPON  
SPJ LIMITED INVESTMENTS AND INCORPORATED MEMORANDUM OF  
LAW**

Steven Jacob, ("Jacob") as a 40% partner in interest of the S&P General Partnership ("S&P") and one of managing general partners of SPJ Limited Investments LTD, ("SPJ") a limited partnership, hereby objects to the issuance of Subpoena upon SPJ and states as follows:

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



5. SPJ exerts no control over the operations of S&P.
6. SPJ 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 SPJ have already been produced.

#### ARGUMENTS

**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.

SPJ is a limited partnership that is a partner in the S&P partnership. SPJ is a limited partnership that holds self-directed IRA's for investment in the S&P general partnership. Under the law IRA's cannot invest in General Partnerships. If someone wanted to invest their IRA in S&P General Partnership they had to go through a qualified custodian and invest through the limited partnership SPJ.

**ALL** documents relating to the partnership, partnership agreements, etc. have already been produced. SPJ does not now or ever owned a computer, and **ALL** the partnership records that are in existence have been transferred to the conservator Phil Von Kahle.

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.

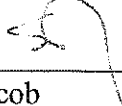
These repeated requests and notices waste the TIME AND MONEY of the Partnership, and the Courts. They are unduly burdensome, harassing, embarrassing and attempt to discredit Jacob in violation of the Florida Rules of Civil Procedure 1.280(c).

**RELIEF REQUESTED**

I respectfully request that this Court deny the issuance of the subpoena because all information has been provided and therefore moot.

May 10, 2013

Respectfully Submitted



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Steven Jacob  
Partner of S &P

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