

IN THE CIRCUIT COURT OF THE  
17TH 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 Marital 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, an individual, and FESTUS AND HELEN STACY FOUNDATION, INC., a Florida corporation,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, individually,

Defendant.

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**PLAINTIFFS' RESPONSE TO CONSERVATOR'S LITIGATION STATUS REPORT  
DATED MAY 20, 2013**

Plaintiffs, **MATTHEW CARONE, as Trustee for the Carone Marital Trust #2 UTD 1/26/00, Carone Gallery, Inc. Pension Trust, Carone Family Trust, Carone Marital 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, an individual, and FESTUS AND HELEN STACY FOUNDATION, INC., a Florida corporation, (jointly referred to as "PLAINTIFFS")** hereby file their Response to the Conservator's Litigation Status Report dated May 20, 2013 ("REPORT") and state that they agree with and have no objections to the findings and conclusion in the Report and request that this Court enter an Order accordingly.

With respect to the Conservator's Litigation Status Report, including attorneys' fees and costs, and the impact upon final distribution to all partners, the Plaintiffs and other certain partners have advanced attorneys' fees and costs in the prosecution of this case to date. By doing so, the Plaintiffs and other certain partners have benefited all partners involved in all cases.

Accordingly, the Plaintiffs and other certain partners hereby request that the Court include in its Order the fact that the Plaintiffs and other certain partners may request that the Court reimburse them for the monies advanced prior to net distributions being made to all partners as a result of these cases.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and/or U.S. Mail to all following persons on the 29<sup>th</sup> day of May, 2013.

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By:     /s/ Frank C. Walker, Esq.      
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