

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

CASE NO. 12-034123 (07)

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

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

CROSS-NOTICE OF TAKING DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the undersigned counsel will take the deposition of:

Deponent: Philip Von Kahle

Date: Wednesday, July 16, 2014

Time: 10:00 AM

Place: Tripp Scott, P.A.
110 Se 6th Street, 15th FL
Fort Lauderdale, FL 33301

DUCES TECUM: See Attached Exhibit A.

upon oral examination before a Notary Public or other officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under applicable Florida Rules of Civil Procedure.

KINDLY GOVERN YOURSELF ACCORDINGLY.

EXHIBIT A

DUCES TECUM

You are required to bring with you the following documents:

1. All documents that Plaintiffs rely upon to support the allegations asserted against Frank Avellino.

2. All documents related to each settlement Plaintiffs have entered into with any other defendant in this action.

3. All settlement documents entered into by or on behalf of Plaintiffs with anyone, whether or not a party to this or any other action, relating to or regarding the facts which form the basis for the claims set forth in the Second Amended Complaint.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49, this 12th day of June, 2014 to all parties on the attached service list.

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