

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

P&S ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership; and S&P
ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership, PHILIP VON KAHLE
as Conservator of P&S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited partnership, and
S&P ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership,
Plaintiffs,

CASE NO. 12-034123
COMPLEX LITIGATION UNIT

v.

MICHAEL D. SULLIVAN, an individual,
STEVEN JACOB, an individual, MICHAEL D.
SULLIVAN & ASSOCIATES, INC., a Florida
corporation, STEVEN F. JACOB, CPA &
ASSOCIATES, INC., a Florida corporation,
FRANK EVELLINO, an individual, MICHAEL
BIENES, an individual, KELCO FOUNDATION,
INC., a Florida Non Profit Corporation, VINCENT
T. KELLY, an individual, VINCENT BARONE, an
individual, EDITH and SAM ROSEN, individuals,
PREMIER MARKETING SERVICES, INC., a
Florida Corporation, and SCOTT HOLLOWAY, an
individual,

Defendants.

_____ /

RE-NOTICE OF TAKING DEPOSITION DUCES TECUM
(Reschedules deposition of June 18, 2014)

PLEASE TAKE NOTICE that pursuant to Fla.R.Civ.P. 1.310, the undersigned attorney will take the following deposition on the following date and time:

NAME

PHILIP VON KAHLE

DATE/TIME

*Wednesday, July 16, 2014 at 10:00 a.m.

LOCATION

Tripp Scott, P.A.
110 SE 6th St., 15th Fl.
Fort Lauderdale, FL 33301

DUCES TECUM

**You are required to bring with you any and all documents that
Plaintiffs rely on to support the allegations against Defendants Steven
Jacob, an individual, and Steven F. Jacob, CPA and Associates, Inc.**

Said deposition will be taken before an officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

The said oral examination will continue from hour to hour and from day to day until completed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by E-service to:

LEONARD K. SAMUELS, ESQ. lsamuels@bergersingerman.com and **ETAN MARK, ESQ.** emark@bergersingerman.com, Attorneys for Plaintiff, at Berger Singerman, 350 East Las Olas Blvd, Suite 1000, Fort Lauderdale, FL 33301

THOMAS M. MESSANA, ESQ. tmessana@messna-law.com, Attorney for Conservator, at Messana, P.A., 401 E. Las Olas Boulevard, Suite 1400, Fort Lauderdale, FL 33301

GARY A. WOODFIELD, ESQ. gwoodfield@haileshaw.com; bpetroni@haileshaw.com; eservices@haileshaw.com, Attorneys for Defendant Frank Avellino, at Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33408

and a courtesy copy hand delivered to Judge Streitfeld, this 12th June, 2014.

TRIPP SCOTT, P.A.
Attorneys for Defendants,
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By: s/Peter G. Herman

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