

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

**Case No: 12-034123(04)
Complex Litigation Unit**

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

vs.
MICHAEL D. SULLIVAN,
et al.,
Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO FILE REVISED
RESPONSE TO DEFENDANT MICHAEL BIENES' FIRST SET OF
INTERROGATORIES**

Plaintiffs, by and through their undersigned counsel, hereby move for an extension of time to file a revised response to Defendant Michael Bienes' ("Defendant") First Set of Interrogatories, and in support thereof state:

1. Pursuant to this Court's Order on Defendant's Motion to Compel, Plaintiffs were ordered to provide revised responses to Defendant's First Set of Interrogatories by June 17, 2014.
2. However, counsel for Plaintiffs was unable to consult with the Conservator about their revised interrogatories, and cannot submit revised interrogatories until after the Conservator has reviewed them.

3. Counsel for Plaintiffs contacted counsel for Defendant, to obtain consent for an extension of time, but have yet to hear if counsel for Defendant.

4. While Plaintiffs anticipate that counsel for Defendant will not object to a one week extension of time, up to and until June 25, 2014, to provide a revised response to Defendant's First Set of Interrogatories, they are filing this Motion in an abundance of caution.

5. Further, no party will suffer prejudice in the event that the Court grants this Motion.

WHEREFORE Plaintiffs request an extension of time, up to and until June 25, 2014, to file revised responses to Defendant Michael Bienes' First Set of Interrogatories, and any other relief the Court deems necessary.

Respectfully submitted,

By: s/ Leonard K. Samuels

Leonard K. Samuels
Florida Bar No. 501610
Etan Mark
Florida Bar No. 720852
Steven D. Weber
Florida Bar No. 47543
Attorney for Plaintiffs
BERGER SINGERMAN LLP
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, Florida 33301
Telephone: (954) 525-9900
Fax: (954) 523-2872
lsamuels@bergersingerman.com
emark@bergersingerman.com
sweber@bergersingerman.com

-2-

 **BERGER SINGERMAN**

350 East Las Olas Boulevard, Suite 1000 Fort Lauderdale, Florida 33301
t: 954-525-9900 f: 954-523-2872

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail and U.S. Mail this 17th day of June, 2014, upon the following:

Von Kahle v. Sullivan
Case No. 12-034123 (07)

Peter G. Herman, Esq.
Tripp Scott
110 SE 6th Street
15th Floor
Fort Lauderdale, FL 33301
Tel.: 954-525-7500
Fax.: 954-761-8475
pgh@trippscott.com
*Attorneys for Steven Jacob; Steven F. Jacob
CPA & Associates, Inc.*

Thomas M. Messana, Esq.
Messana, P.A.
401 East Las Olas Boulevard, Suite 1400
Fort Lauderdale, FL 33301
Tel.: 954-712-7400
Fax: 954-712-7401
tmessana@messana-law.com
Attorneys for Plaintiff

Gary A. Woodfield, Esq.
Haile, Shaw & Pfaffenberger, P.A.
660 U.S. Highway One, Third Floor
North Palm Beach, FL 33408
Tel.: 561-627-8100
Fax.: 561-622-7603
gwoodfiled@haileshaw.com
bpetroni@haileshaw.com
eservices@haileshaw.com
Attorneys for Frank Avellino

Mark F. Raymond, Esq.
mraymond@broadandcassel.com
Jonathan Etra, Esq.
jetra@broadandcassel.com
Christopher Cavallo, Esq.
ccavallo@broadandcassel.com
Broad and Cassel
One Biscayne Boulevard, 21st Floor
2 S. Biscayne Boulevard
Miami, FL 33131
Tel.: 305-373-9400
Fax.: 305-373-9443
Attorneys for Michael Bienes

By: s/Leonard K. Samuels
Leonard K. Samuels

5776126-1

-3-

 **BERGER SINGERMAN**

350 East Las Olas Boulevard, Suite 1000 Fort Lauderdale, Florida 33301
t: 954-525-9900 f: 954-523-2872