

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

**Case No: 12-034123(07)
Complex Litigation Unit**

P&S ASSOCIATES, GENERAL PARTNERSHIP,
a Florida limited partnership, et al.,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**PLAINTIFFS' SECOND RE-NOTICE OF TAKING VIDEO DEPOSITIONS
OF DEFENDANTS MICHAEL BIENES AND FRANK AVELLINO**

TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that the undersigned attorneys will take the depositions of:

Deponent	Date	Time	Location
FRANK AVELLINO	July 16, 2015	10:00 a.m.	Berger Singerman LLP One Town Center Road Suite 301 Boca Raton, FL 33486
MICHAEL BIENES	July 17, 2015	10:00 a.m.	Berger Singerman LLP 350 E. Las Olas Blvd. Suite 1000 Fort Lauderdale, FL 33301

Said deposition will be taken before a Notary Public or any officer authorized to administer oaths in the State of Florida, and a person who is neither a relative nor employee of

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such attorney or counsel, and who is not financially interested in this action. The depositions are being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.

The depositions will continue from day to day until completed and will be recorded via stenographic and video means.

Respectfully submitted,

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cc: Empire Legal Reporting

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of June, 2015, a true and correct copy of the foregoing document was served on the following parties:

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