

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

MATTHEW CARONE, as Trustee for the Carone
Marital Trust #2 UTD 1/26/00, et al,

CASE NO. 12-24051 (07)
COMPLEX LITIGATION UNIT

Plaintiffs,

v.

MICHAEL D. SULLIVAN, individually, et
al,

Defendants.

**OPPOSITION TO CONSERVATOR'S MOTION FOR CONTEMPT AND
NOTICE OF CROSS MOTION FOR A PROTECTIVE ORDER**

COMES NOW THE DEFENDANT, MICHAEL SULLIVAN, by and through his counsel and
states:

1. Michael D. Sullivan is a defendant named in the above entitled action as well as a partner
in S&P Partnership and P&S Partnership.
2. Mr. Messana, Counsel for the Conservator is well aware that Defendant does not have the
records he is requesting and cannot produce what he does not have.

WHEREFORE, based upon the foregoing, Defendant requests that the Court deny the
Conservator's Motion and instead enter a Protective Order enjoining the Conservator from further
harassing Defendant by requesting documents.

I HEREBY CERTIFY that a true and correct copy of the above was sent by e-mail to: Thomas M. Messana at TMessana@Messana-Law.com, NBarrus@Messana-Law.com, BLieberman@Messana-Law.com and THurley@Messana-Law.com and service to the Conservator at PhilVonKahle@Moecker.com, PhilV@Moecker.com, and NJoseph@Moecker.com this July 30, 2013.

_____/s/ Harry Winderman
HARRY WINDERMAN, ESQ.
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