

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

COMPLEX LITIGATION UNIT

CASE NO. 12-034123 (07)

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,

vs.

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 AVELLINO,  
an individual, MICHAEL BIENES,  
an individual, KELKO FOUNDATION,  
INC., a Florida Non Profit Corporation,  
and VINCENT T. KELLY, an individual,

Defendants.

\_\_\_\_\_ /

**AMENDED NOTICE OF HEARING**

*(Add on)*

YOU ARE HEREBY NOTIFIED that the undersigned has called up the following for hearing:

**MATTERS:** Michael Bienes' Motion to Compel Plaintiffs to Produce Documents Responsive to His Third Request for Production

**DATE:** August 19, 2015

**TIME:** 8:45 a.m.

**JUDGE:** The Honorable Jack Tuter

**PLACE:** Broward County Courthouse  
201 Southeast Sixth Street  
Fort Lauderdale, Florida 33301

**PLEASE BE GOVERNED ACCORDINGLY.**

Dated this 5<sup>th</sup> day of August, 2015.

Respectfully submitted,

/s/ Shane P. Martin

Mark F. Raymond (373397)

[mraymond@broadandcassel.com](mailto:mraymond@broadandcassel.com)

[ssmith@broadandcassel.com](mailto:ssmith@broadandcassel.com)

Jonathan Etra (686905)

[jetra@broadandcassel.com](mailto:jetra@broadandcassel.com)

[msoza@broadandcassel.com](mailto:msoza@broadandcassel.com)

Shane P. Martin (056306)

[smartin@broadandcassel.com](mailto:smartin@broadandcassel.com)

[msanchez@broadandcassel.com](mailto:msanchez@broadandcassel.com)

BROAD AND CASSEL

One Biscayne Tower, 21<sup>st</sup> Floor

2 South Biscayne Boulevard

Miami, Florida 33131

Telephone: 305.373.9400

Facsimile: 305.373.9443

*Counsel for Defendant, Michael Bienes*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of August, 2015, the foregoing document was served to the parties identified on the attached Service List via electronic mail.


/s/ Shane P. Martin  
\_\_\_\_\_  
Shane P. Martin, Esq.

**SERVICE LIST**

THOMAS M. MESSANA, ESQ.  
MESSANA, P.A.  
SUITE 1400, 401 EAST LAS OLAS BOULEVARD  
FORT LAUDERDALE, FL 33301  
[tmessana@messana-law.com](mailto:tmessana@messana-law.com)  
*Attorneys for P & S Associates General Partnership*

LEONARD K. SAMUELS, ESQ.  
ETHAN MARK, ESQ.  
STEVEN D. WEBER, ESQ.  
BERGER SIGNERMAN  
350 EAST LAS OLAS BOULEVARD, STE 1000  
FORT LAUDERDALE, FL 33301  
[emark@bergersingerman.com](mailto:emark@bergersingerman.com)  
[lsamuels@bergersingerman.com](mailto:lsamuels@bergersingerman.com)  
[sweber@bergersingerman.com](mailto:sweber@bergersingerman.com)  
[DRT@bergersingerman.com](mailto:DRT@bergersingerman.com)  
*Attorneys for Plaintiff*

PETER G. HERMAN, ESQ.  
TRIPP SCOTT, P.A.  
15<sup>th</sup> FLOOR  
110 SE 6<sup>th</sup> STREET  
FORT LAUDERDALE, FL 33301  
[pgh@trippscott.com](mailto:pgh@trippscott.com)  
[ele@trippscott.com](mailto:ele@trippscott.com)  
*Attorneys for Defendants Steven F. Jacob and Steven F. Jacob CPA & Associates, Inc.*

 <b>17th Judicial Circuit</b>		
<b>Case Schedule Receipt:</b>		
<b>Sequence Number:</b>	7	
<b>Judge Name:</b>	Tuter, Jack	
<b>Case Number:</b>	cace12034123	
<b>Schedule Date:</b>	08/19/2015	
<b>Scheduling Attorney Name:</b>	Jonathan, Etra	
<b>Motion Title:</b>	Michael Bienes' Motion to Compel Plaintiffs to Produce Documents Responsive to His Third Request for Production	
<b>Case Entry Date:</b>	Wed Aug 05 10:21:42 EDT 2015	
	Back	Print