

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

PHILIP J. VON KAHLE, as Conservator of
P&S Associates, General Partnership and
S&P Associates, General Partnership

Case No. 12-034123 (07)
Complex Litigation Unit

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

**DEFENDANT STEVEN F. JACOB'S RESPONSE TO
PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS**

Defendant, STEVEN F. JACOB, by and through undersigned counsel, responds to Plaintiff's First Request for Admissions, served August 11, 2015, as follows:

1. Between 2002 and 2009, Michael D. Sullivan caused You to receive over \$600,000.00 that previously came from S&P and/or P&S.

Response: Denied.

2. Between 2002 and 2009, You received over \$600,000.00 that previously came from S&P and/or P&S.

Response: Denied.

3. Between 2002 and 2009, You received over \$600,000.00 in commissions that previously came from S&P and/or P&S.

Response: Denied.

4. Between 2002 and 2009, Guardian Angel Trust, LLC received over \$600,000.00 from Michael D. Sullivan & Associates.

Response: Denied.

5. Between 2002 and 2009, You received over \$600,000.00 from Guardian Angel Trust, LLC.

Response: Denied.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of September, 2015, the foregoing document is being e-served on all counsel of record on the attached service list.

Tripp Scott, P.A.
*Attorneys for Defendant Steven Jacob and
Steven F. Jacob, CPA and Associates, Inc.*
110 SE 6th Street, 15th Floor
Fort Lauderdale, FL 33301
Phone: 954 525 7500
Fax: 954 761 8475

By: s/Peter G. Herman

Peter G. Herman
Fla. Bar No. 353991
pgh@trippscott.com
rep@trippscott.com
ele@trippscott.com

SERVICE LIST

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

LEONARD K. SAMUELS, ESQ.
ETHAN MARK, ESQ.
STEVEN D. WEBER, ESQ.
BERGER SINGERMAN
350 EAST LAS OLAS BOULEVARD, SUITE 1000
FORT LAUDERDALE, FL 33301
emark@bergersingerman.com
lsamuels@bergersingerman.com
sweber@bergersingerman.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

gwoodfield@haileshaw.com

bpetroni@haileshaw.com

eservices@haileshaw.com

Attorneys for Frank Avellino

JONATHAN ETRA, ESQ.
MARK F. RAYMOND, ESQ.
SHANE MARTIN, ESQ.
CHRISTOPHER CAVALLO, ESQ.
BROAD AND CASSEL
One Biscayne Tower, 21st Floor
2 South Biscayne Blvd.
Miami, FL 33131

mraymond@broadandcassel.com

ssmith@broadandcassel.com

ccavallo@broadandcassel.com

jetra@broadandcassel.com

msouza@broadandcassel.com

smartin@broadandcassel.com

msanchez@broadandcassel.com

Attorneys for Michael Bienes