

**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.

RE-NOTICE OF TAKING DEPOSITION DUCES TECUM OF DIANNE BIENES
(Changes Location Only)

To: All Counsel Listed on the Attached Service List.

Please take notice that the undersigned attorneys will take the deposition of **Dianne Bienes**, on **Friday, September 25, 2015** commencing at **10:00 a.m.** at the law offices of **Messana, P.A., 401 East Las Olas Boulevard, Suite 1400, Fort Lauderdale, Florida 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 such attorney or counsel, and who is not financially interested in this action. The deposition is 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 deposition is being taken pursuant to the Subpoena attached to Plaintiff's Re-Notice of Taking Deposition Duces Tecum of Dianne Bienes dated September 3, 2015. The deponent shall also bring with her at the time of the deposition, all of the items as directed by the Court's Order dated May 8, 2015.

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

Respectfully submitted this 17th day of September, 2015.

Messana, P.A.
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By: /s/ Thomas M. Messana
Thomas M. Messana
Florida Bar No. 0991422

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 17, 2015 a copy of the foregoing was served by e-mail via the Florida Courts e-filing Portal to the following parties:

Leonard K. Samuels, Esq., Etan Mark, Esq.; Zachary P. Hyman, Esq. and Steven D. Weber, Esq. at lsamuels@bergersingerman.com; emark@bergersingerman.com; zhyman@bergersingerman.com; drt@bergersingerman.com; sweber@bergersingerman.com; lyun@bergersingerman.com; clamb@bergersingerman.com; mvega@bergersingerman.com; bboyd@bergersingerman.com

Steven Jacob and Steven F. Jacob, CPA & Associates, Inc. c/o Peter G. Herman, Esq. at pgh@trippscott.com; rep@trippscott.com; ele@trippscott.com

Frank Avellino c/o Gary A. Woodfield, Esq., Susan B. Yoffe, Esq. and Terry E. Resk, Esq. at gwoodfield@haileshaw.com; bpetroni@haileshaw.com; eservices@haileshaw.com; syoffee@haileshaw.com; cmarino@haileshaw.com; tresk@haileshaw.com

Michael Bienes c/o Jonathan Etra, Esq. at jetra@broadandcassel.com; msoza@broadandcassel.com; Shane P. Martin, Esq. at smartin@broadandcassel.com; yportanova@broadandcassel.com; and Christopher Cavallo, Esq. at ccavallo@broadandcassel.com

and by U.S. Mail on September 17, 2015 to Dianne Bienes, 3200 Port Royale Drive, N., Apt. 100, Fort Lauderdale, Florida 33308.

Respectfully submitted this 17th day of September, 2015.

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