

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

CASE NO. 12-034123(07)

P & S ASSOCIATES GENERAL
PARTNERSHIP, etc. et al.,

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.

Defendants.

AMENDED NOTICE OF PRODUCTION TO NON-PARTY UNDER RULE 1.351

YOU ARE NOTIFIED that after ten (10) days from the date of service of this notice, if service is by delivery, or fifteen (15) days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue or apply to the clerk of this court for issuance of the attached subpoena directed to:

Records Custodian, Festus & Helen Stacy Foundation, Inc., who is not a party and whose address is 5110 N. Federal Highway, Suite 100, Fort Lauderdale, FL 33308, to produce the items listed at the time and place specified in the subpoena.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49 to all parties on the attached service this 15th day of October, 2015.

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By: /s/ Gary A. Woodfield, Esq.

Gary A. Woodfield, Esq.

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SUBPOENA DUCES TECUM WITHOUT DEPOSITION
(Records May Be Mailed in Lieu of Deposition)

To: Records Custodian, Festus & Helen Stacy Foundation, Inc.
c/o Registered Agent Douglas A. Stepelton
5110 N. Federal Highway, Suite 100
Ft. Lauderdale, FL 33308

YOU ARE COMMANDED to appear at Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33418, on _____, 2015 at 10:00 AM., and to have with you at that time and place the following:

See Attached Exhibit A.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or

- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated this _____ day of October, 2015.

FOR THE COURT

HAILE, SHAW & PFAFFENBERGER, P.A.

Attorneys for Defendant

660 U.S. Highway One, Third Floor

North Palm Beach, FL 33408

Phone: (561) 627-8100

Fax: (561) 622-7603

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bpetroni@haileshaw.com

syoffee@haileshaw.com

By: _____

Gary A. Woodfield, Esq.

FL Bar No. 563102

EXHIBIT A

Definitions

1. "Partnership" shall mean P&S Associates General Partnership, its partners, agents and representatives; and S&P Associates General Partnership, its partners, agents and representatives.
2. "You" shall mean Festus & Helen Stacy Foundation, Inc., its agents and/or representatives.
3. "Partnership documents" shall mean the partnership financial records, documents which reflect communications between and among the partners, and transcripts or other written documents reflecting any meetings between and among the partners.

Documents

1. All Partnership documents provided to you by any partner, person or entity.
2. All documents evidencing when you received any Partnership documents.