

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

**Case No: 12-034123(07)  
Complex Litigation Unit**

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,

v.

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, KELCO FOUNDATION,  
INC., a Florida Non Profit Corporation, VINCENT  
T. KELLY, an individual, VINCENT BARONE, an  
individual, EDITH and SAM ROSEN, individuals,  
PREMIER MARKETING SERVICES, INC., a  
Florida Corporation, and SCOTT HOLLOWAY, an  
individual,

Defendants.

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**PLAINTIFFS' NOTICE OF POSTPONEMENT OF DEPOSITION  
DUCES TECUM OF RACHEL ROSENTHAL LEIRSCH**

**TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE**

 **BERGER SINGERMAN**

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**PLEASE TAKE NOTICE** that the deposition of Rachel Rosenthal Leirsch previously scheduled for the date and time indicated below, is being **POSTPONED** and will be rescheduled at a date and time not yet determined.

<b>Deponent</b>	<b>Date</b>	<b>Time</b>	<b>Location</b>
<b>Rachel Rosenthal Leirsch</b>	<b>Tuesday, October 21, 2014</b>	<b>9:30 a.m.</b>	<b>Veritext Legal Solutions 1250 Broadway, Suite 2400 New York, New York 10001</b>

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of October, 2014, a true and correct copy of the foregoing document was served on the following parties:

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