

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
NOTICE OF SERVING OF INTERROGATORIES TO PLAINTIFF

Defendant, STEVEN F. JACOB, by and through his undersigned counsel, hereby gives notice of serving his Interrogatories upon Plaintiff, Philip J. Von Kahle, as Conservator of P&S Associates, General Partnership and S&P Associates, General Partnership, to be answered under oath and in writing, within thirty (30) days of service herein, in accordance with the Florida Rules of Civil Procedure 1.340.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of October, 2015, the foregoing document is being e-served on all counsel of record on the attached service list.

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DEFINITIONS

1. "Partnerships" shall mean P&S Associates, General Partnership and S &P Associates, General Partnership, their general and limited partners, members and representatives and agents.
2. "You" or "your" shall mean Plaintiffs and their partners, associates, members and representatives and agents.
3. "Jacob" shall mean Steven Jacob.
4. "CPA shall mean Steven F. Jacob, CPA & Associates, Inc.
5. "Sullivan" shall mean Michael D. Sullivan.
6. To "identify" a person means to provide the following information: (a) the person's full name; (b) the person's present or last known residence address and telephone number; (c) the person's present or last known business affiliation and job title, and the person's present or last known employment address and telephone.

INSTRUCTIONS

1. Plaintiff shall quote each interrogatory in full immediately preceding the statement of any answer, response, or objection thereto.
2. Each interrogatory is to be answered separately and in full in writing under oath, unless all portions of an interrogatory are in good faith objected to, in which event the reasons for all of Plaintiff's objections shall be stated in detail. If an objection pertains to only a portion of an interrogatory, or to a word, phrase, or clause contained within such interrogatory, Plaintiff shall state their objection to that portion, and shall answer the interrogatory to the extent it is not objectionable.
3. Plaintiff is requested to furnish all information available to him, his attorneys, accountants, investigators, representatives, agents or any other person acting on Plaintiff's behalf and not merely such information as is known by Plaintiff's own personal knowledge. If Plaintiff cannot answer or respond in full after exercising due diligence to secure the information, he should

answer or respond, to the extent possible, specifying the reason or reasons for the inability to answer or respond to the remainder.

4. Any recipient of these interrogatories who withholds any requested information by reason of a claim of privilege or attorney work product, or who objects to any part of these interrogatories, shall state the nature of the privilege or objection and provide sufficient information to permit a full determination of whether the claim or objection is proper. For any documents that are withheld, provide a list identifying each such document for which the claim of privilege is made or to which the objection relates, together with the following information: (i) the type of document, e.g. , letter or memorandum, and any attachments; (ii) the subject matter of the document; (iii) the date of the document; (iv) the author(s) of the document, (v) the recipient(s) of document; (vi) number of pages; (v) the number of the interrogatory to which the document relates; (vi) the reason(s) for each objection or claim of privilege; and (vii) the identity of each person having knowledge of the actual basis, if any, on which the privilege or other ground for objection is based.

INTERROGATORIES

1. Please identify all persons who have knowledge of the allegations contained in Plaintiffs' Fifth Amended Complaint. For each person identified, please specifically set forth the substance of their knowledge.

ANSWER:

2. Please identify all persons who have knowledge of the allegations in Paragraph 44 - 46 of the Fifth Amended Complaint. For each person identified, please set forth the substance of their knowledge.

ANSWER:

3. Please identify all persons who have knowledge of the allegations that Guardian Angel Trust, LLC, SPJ Investments, Limited and JS&P Associates, General Partnership held millions of dollars of Partnership money as alleged in paragraph 47 of the Fifth Amended Complaint. For each person identified, please set forth the substance of their knowledge.

ANSWER:

4. Please identify all persons who have knowledge of the allegations in Paragraph 48 - 49 of the Fifth Amended Complaint. For each person identified, please set forth the substance of their knowledge.

ANSWER:

5. Please identify all persons who have knowledge of the allegations that Jacob and Steven F. Jacob, CPA acted as accountant and bookkeeper for the Partnerships. For each person identified, please set forth the substance of their knowledge.

ANSWER:

6. Please identify all persons who have knowledge of the allegations in Paragraph 61 - 67 of the Fifth Amended Complaint. For each person identified, please set forth the substance of their knowledge.

ANSWER:

7. Please identify all persons who have knowledge of the allegations in Counts III - VII of the Fifth Amended Complaint. For each person identified, please set forth the substance of their knowledge.

ANSWER:

8. If you denied any of the Requests for Admissions propounded on you by this Defendant, please provide the specific factual basis for same.

ANSWER: