

P & S ASSOCIATES, GENERAL PARTNERSHIP and S & P ASSOCIATES, GENERAL PARTNERSHIP,

Plaintiff,

v.

ROBERTA P. ALVES, ET AL.,

Defendants.

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA
CASE NO. 12-028324 (07)
Complex Litigation Unit

STIPULATION BETWEEN THE CONSERVATOR AND THE ROSEN PARTIES¹

Philip J. von Kahle (the "Conservator"), as Conservator for P&S Associates, General Partnership ("P&S") and S&P Associates, General Partnership ("S&P") (together, the "Partnerships") and Sam and Edith Rosen (the "Rosen Parties"), through their undersigned counsel, hereby stipulate and agree as follows (the "Stipulation"):

1. In the Distribution Motion, the Conservator recommended reserving, but withholding all proposed distributions to the Rosen Parties.

2. In the interest of conserving the parties and Court's resources, the Conservator and the Rosen Parties have agreed to enter into this Stipulation.

3. The Rosen Parties agree with the Conservator's recommendation to reserve, but withhold all interim distributions to the Rosen Parties until further Order of the Court without prejudice to either party's ability to advance same upon appropriate motion. The Conservator and the Rosen Parties agree that neither party will file such motion earlier than ninety (90) days after the date of this Stipulation.

Dated November 11, 2013.

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By: _____
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¹ Capitalized terms not defined herein shall have the meaning ascribed them in the May 31, 2013 *Conservator's Motion for Summary Judgment to (i) Approve Determination Claims; (ii) Approve Plan of Distribution, and (iii) Establish Objection Procedures* (the "Distribution Motion").