

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, a Florida limited  
Partnership, *et al*,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

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**NOTICE OF TAKING DEPOSITION DUCES TECUM**

PLEASE TAKE NOTICE that the undersigned counsel will take the deposition of:

Deponent: Records Custodian, Festus & Helen Stacy Foundation, Inc.

Date: December 3, 2015

Time: 9:30 A.M.

Place: Broad and Cassel  
1 Financial Plaza, #2700  
Fort Lauderdale, FL 33394

**DUCES TECUM:** See Attached Exhibit A.

upon oral examination before a Notary Public or other officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under applicable Florida Rules of Civil Procedure.

KINDLY GOVERN YOURSELF ACCORDINGLY.

## **EXHIBIT A**

### **Definitions**

1. “You” or “Your” shall mean the Festus & Helen Stacy Foundation, Inc., its directors, officers or agents.
2. “P&S/S&P” shall mean P&S Associates General Partnership and/or S&P Associates General Partnership.

### **Documents**

1. Books and records of P&S/S&P which You reviewed in or about 2008;
2. Any report, memo, analysis or review prepared as a result of the review identified in Items 1 and/or 4;
3. Any documents reflecting referral fees, commissions, management fees, gifts, charitable contributions and/or kickbacks You received or which were credited to Your accounts with P&S/S&P;
4. Any documents reflecting the review of the books and records of P&S/S&P in or about November 2011 by Ali Ansari;
5. Any documents reflecting the transfer of the books and records of P&S/S&P from You and/or Your agents to Margaret Smith.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18th day of November, 2015, the foregoing document is being served on those on the attached service list by electronic service via the Florida Court E-Filing Portal in compliance with Fla. Admin Order No. 13-49.

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