

**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, et al.,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

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**PLAINTIFFS' NOTICE OF TAKING DEPOSITIONS  
OF DEFENDANTS MICHAEL BIENES AND FRANK AVELLINO**

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

**PLEASE TAKE NOTICE** that the undersigned attorneys will take the depositions of:

<b>Deponent</b>	<b>Date</b>	<b>Time</b>	<b>Location</b>
<b>FRANK AVELLINO</b>	<b>Friday January 23, 2015</b>	<b>10:00 a.m.</b>	<b>Berger Singerman LLP 2650 North Military Trail Boca Raton, FL 33431</b>
<b>MICHAEL BIENES</b>	<b>Thursday January 29, 2015</b>	<b>10:00 a.m.</b>	<b>Berger Singerman LLP 2650 North Military Trail Boca Raton, FL 33431</b>

Said deposition will be taken before a Notary Public or any officer authorized to administer oaths in the State of Florida, and a person who is neither a relative nor employee of

 **BERGER SINGERMAN**

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such attorney or counsel, and who is not financially interested in this action. The depositions are being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court.

The depositions will continue from day to day until completed and will be recorded via stenographic means.

Respectfully submitted,

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cc: Friedman Lombardi & Olsen, Court Reporters

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25th day of November, 2014, a true and correct copy of the foregoing document was served on the following parties:

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