IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

COMPLEX LITIGATION UNIT

CASE NO: CACE 12-034123 (07)

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.	
STEVEN JACOB, et al.,	
Defendants.	

CROSS-NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that pursuant to Florida Rule of Civil Procedure 1.310, the undersigned attorney will take the deposition of:

Deponent	Date	Time	Place
MICHAEL SULLIVAN	Tuesday, December 1, 2015	9:30 a.m.	Broad and Cassel 1 Financial Plaza, #2700 Ft. Lauderdale, FL 33394

Said deposition will be taken before a court reporter or any other officer authorized by law to take depositions in the State of Florida, and be recorded by videotaped and/or stenographic means. The deposition will continue from day to day until completed. This

deposition is being taken for the purpose of discovery or for such other purposes as are permitted under Florida Rules of Civil Procedure, Sections 1.280, 1.310 and 1.390.

Respectfully submitted,

/s/ Shane P. Martin

Mark F. Raymond, P.A. Fla. Bar No.: 373397

 $\underline{mraymond@broadandcassel.com}$

ssmith@broadandcassel.com

Jonathan Etra, P.A. Fla. Bar No.: 686905

jetra@broadandcassel.com

ybordes@broadandcassel.com

Shane P. Martin, Esq. Fla. Bar No.: 056306

smartin@broadandcassel.com

yportanova@broadandcassel.com

BROAD AND CASSEL

One Biscayne Tower, 21st Floor 2 South Biscayne Boulevard

Miami, Florida 33131

Tel.: 305-373-9400

Fax: 305-373-9443

Attorneys for Defendant, Michael Bienes

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 25, 2015, the foregoing document was served via E-mail to: Thomas E. Messana, Esq., Thomas Zeichman, Messana, P.A., 401 East Las Olas Suite Boulevard. 1400. Ft. Lauderdale, FL 33301 (tmessana@messana-law.com. tmessana@bellsouth.net, mwslawfirm@gmail.com, tzeichman@messana-law.com); Leonard K. Samuels, Esq., Etan Mar, Esq., Steven D. Weber, Esq., Berger Singerman LLP, 350 East Las Olas Boulevard, Suite 1000, Ft. Lauderdale, FL 33301 (Isamuels@bergersingerman.com, vleon@bergersingerman.com, emark@bergersingerman.com, lyun@bergersingerman.com, drt@bergersingerman.com, sweber@bergersingerman.com, mvega@bergersingerman.com, zhyman@bergersingerman.com, clamb@bergersingerman.com); Peter G. Herman, Esq., Tripp Scott, 110 S.E. 6th Street, 15th Floor, Ft. Lauderdale, FL 33301 (pgh@trippscott.com, rep@trippscott.com, ele@trippscott.com); Paul V. DeBianchi, Esq., Paul V. DeBianchi, P.A., 111 S.E. 12th Street, Ft. Lauderdale, FL 33316 (Debianchi236@bellsouth.net); Gary A. Woodfield, Esq., Susan B. Yoffee, Esq., Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway Third Floor, North Palm Beach, FL 33408 (gwoodfield@haileshaw.com, bpetroni@haileshaw.com. eservices@haileshaw.com. svoffee@haileshaw.com. cmarino@haileshaw.com); Matthew Triggs, Esq., Andrew Thomson, Esq. Proskauer Rose LLP, 2255 Glades Road, Suite 421 Atrium, Boca Raton, FL 33431 (mtriggs@proskauer.com, athomson@proskauer.com, florida.litigation@proskauer.com); Robert J. Hunt, Esq., Debra D. Klingsberg. Esq., Hunt & Gross, P.A., 185 Spanish River Boulevard, Suite 220, Boca Raton, FL 33431 (bobhunt@huntgross.com, eservice@huntgross.com, Sharon@huntgross.com) and Harry Winderman (harry4334@hotmail.com).

/s/ Shane P. Martin
Shane P. Martin, Esq.