

**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' MOTION FOR AN ORDER GRANTING  
APPROVAL OF FILING SETTLEMENT DOCUMENTS UNDER SEAL**

Philip J. Von Kahle (the "Conservator"), as Conservator for P&S Associates, General Partnership ("P&S") and S&P Associates, General Partnership ("S&P") (the "Partnerships", and together with the Conservator, the "Plaintiffs"), by and through undersigned attorneys and pursuant to CLP 5.14, hereby moves this honorable Court for an Order Granting Approval of Filing Settlement Documents Under Seal (the "Motion") and in support hereof states as follows:

1. On November 4, 2014, Defendant Michael D. Sullivan filed a Motion to Dismiss/Enforce Settlement ("Settlement Motion").
2. The deadline to file a response to the Settlement Motion expires on December 1, 2014.
3. In order to properly respond to the Settlement Motion, Plaintiffs need to cite to provisions of a Confidential Settlement Agreement, and intend to attach that Confidential Settlement Agreement to their response. However, the Confidential Settlement Agreement has been deemed confidential, and Plaintiffs cannot file it conventionally without violating its confidentiality provisions.

4. Accordingly, Plaintiffs respectfully request that the Court grant their Motion and permit them to file their response to the Settlement Motion and the attached Confidential Settlement Motion under seal.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter an Order (i) Granting Plaintiff's Motion for Order Granting Approval of Filing Settlement Documents Under Seal; (ii) directing the Clerk to maintain the Settlement Documents under seal until further Order of this Court; and (iii) grant such other relief as may be just and proper.

Dated: December 1, 2014

BERGER SINGERMAN LLP  
*Attorneys for Plaintiffs*  
350 East Las Olas Blvd, Suite 1000  
Fort Lauderdale, FL 33301  
Telephone: (954) 525-9900  
Direct: (954) 712-5138  
Facsimile: (954) 523-2872

By: s/ LEONARD K. SAMUELS  
Leonard K. Samuels  
Florida Bar No. 501610  
lsamuels@bergersingerman.com  
Etan Mark  
Florida Bar No. 720852  
emark@bergersingerman.com  
Steven D. Weber  
Florida Bar No. 47543  
sweber@bergersingerman.com

and

MESSANA, P.A.  
*Attorneys for Plaintiffs*  
401 East Las Olas Boulevard, Suite 1400  
Ft. Lauderdale, FL 33301  
Telephone: (954) 712-7400  
Facsimile: (954) 712-7401  
Email: tmessana@messana-law.com  
By: /s/ Thomas M. Messana  
Thomas M. Messana, Esq.  
Florida Bar No. 991422  
Brett D. Lieberman, Esq.  
Florida Bar No. 69583  
Thomas G. Zeichman, Esq.  
Florida Bar No. 99239

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1<sup>st</sup> day of December 2014, a true and correct copy of the foregoing document was served on the following parties:

Peter G. Herman, Esq.  
Tripp Scott  
110 SE 6<sup>th</sup> Street  
15<sup>th</sup> Floor  
Fort Lauderdale, FL 33301  
Tel.: 954-525-7500  
Fax.: 954-761-8475  
[pgh@trippscott.com](mailto:pgh@trippscott.com)  
*Attorneys for Steven Jacob; Steven F. Jacob  
CPA & Associates, Inc.*

Thomas M. Messana, Esq.  
Messana, P.A.  
401 East Las Olas Boulevard, Suite 1400  
Fort Lauderdale, FL 33301  
Tel.: 954-712-7400  
Fax: 954-712-7401  
[tmessana@messana-law.com](mailto:tmessana@messana-law.com)  
*Attorneys for Plaintiffs*

Harry Winderman, Esq.  
Harry4334@hotmail.com  
One Boca Place, Suite 218A  
Boca Raton, FL 33431  
Tel.: 561-241-0332  
Fax.: (561)241-5266  
*Attorney for Michael D. Sullivan;  
Michael D. Sullivan & Associates,  
Inc.*

Mark F. Raymond, Esq.  
[mraymond@broadandcassel.com](mailto:mraymond@broadandcassel.com)  
Jonathan Etra, Esq.  
[jetra@broadandcassel.com](mailto:jetra@broadandcassel.com)  
Christopher Cavallo, Esq.  
[ccavallo@broadandcassel.com](mailto:ccavallo@broadandcassel.com)  
Broad and Cassel  
One Biscayne Boulevard, 21st Floor  
2 S. Biscayne Boulevard  
Miami, FL 33131  
Tel.: 305-373-9400  
Fax.: 305-373-9443  
*Attorneys for Michael Bienes*

Gary A. Woodfield, Esq.  
Haile, Shaw & Pfaffenberger, P.A.  
660 U.S. Highway One, Third Floor  
North Palm Beach, FL 33408  
Tel.: 561-627-8100  
Fax.: 561-622-7603  
[gwoodfiled@haileshaw.com](mailto:gwoodfiled@haileshaw.com)  
[bpetroni@haileshaw.com](mailto:bpetroni@haileshaw.com)  
[eservices@haileshaw.com](mailto:eservices@haileshaw.com)  
*Attorneys for Frank Avellino*

By: s/Leonard K. Samuels  
Leonard K. Samuels