

**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.

STEVEN JACOB, et al.,

Defendants.

**RE-NOTICE OF TAKING DEPOSITION
OF MICHAEL SULLIVAN**

TO: ALL COUNSEL LISTED ON CERTIFICATE OF SERVICE

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

Deponent	Date	Time	Location
MICHAEL SULLIVAN	Thursday December 17, 2015	9:30 a.m.	Berger Singerman LLP 350 E. Las Olas Blvd. Suite 1000 Fort Lauderdale, FL 33301
	And Friday, December 18, 2015	9:30 a.m.	

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

such attorney or counsel, and who is not financially interested in this action. The deposition is 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 deposition will continue from day to day until completed and will be recorded via stenographic means.

Respectfully submitted,

BERGER SINGERMAN LLP
Attorneys for Plaintiffs
1450 Brickell Avenue, Suite 1900
Miami, Florida 33131
Telephone: (305) 755-9500
Facsimile: (305) 714-4340

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

cc: Empire Legal Court Reporting

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on December 14, 2015, a copy of the foregoing was filed with the Clerk of the Court via the E-filing Portal, and served via Electronic Mail by the E-filing Portal upon:

Peter G. Herman, Esq.
Tripp Scott
110 SE 6th Street, 15th Floor
Fort Lauderdale, FL 33301
Tel.: 954-525-7500
Fax.: 954-761-8475
pgh@trippscott.com
ele@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
Attorneys for Plaintiff

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
gwoodfield@haileshaw.com
bpetroni@haileshaw.com
eservices@haileshaw.com
syoffee@haileshaw.com
cmarino@haileshaw.com
Attorneys for Defendant, Frank Avellino

Jonathan Etra, Esq.
Christopher Cavallo, Esq.
Mark F. Raymond, Esq.
Shane Martin, Esq.
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131
Tel.: 305-373-9400
Fax.: 305-373-9443
mraymond@broadandcassel.com
jetra@braodandcassel.com
ccavallo@broadandcassel.com
Attorneys for Defendant, Michael Bienes

Harry Winderman, Esq.
One Boca Place
2255 Glades Road, Suite 218A
Boca Raton, FL 33431
Harry4334@hotmail.com
***Attorneys for Michael D. Sullivan and
Michael D. Sullivan & Associates, Inc.***