

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
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.

MICHAEL D. SULLIVAN, 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:

<b>Deponent</b>	<b>Date</b>	<b>Time</b>	<b>Place</b>
<b>MICHAEL SULLIVAN</b>	<b>Thursday, December 17, 2015</b>	<b>9:30 a.m.</b>	<b>Broad and Cassel 1 Financial Plaza, #2700 Ft. Lauderdale, FL 33394</b>

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

**BROAD and CASSEL**

One Biscayne Tower, 21st Floor 2 South Biscayne Blvd. Miami, Florida 33131-1811 305.373.9400

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/ Jonathan Etra

Mark F. Raymond, P.A.

Fla. Bar No.: 373397

[mraymond@broadandcassel.com](mailto:mraymond@broadandcassel.com)

[ssmith@broadandcassel.com](mailto:ssmith@broadandcassel.com)

Jonathan Etra, P.A.

Fla. Bar No.: 686905

[jetra@broadandcassel.com](mailto:jetra@broadandcassel.com)

[ybordes@broadandcassel.com](mailto:ybordes@broadandcassel.com)

Shane P. Martin, Esq.

Fla. Bar No.: 056306

[smartin@broadandcassel.com](mailto:smartin@broadandcassel.com)

[yportanova@broadandcassel.com](mailto:yportanova@broadandcassel.com)

BROAD AND CASSEL

One Biscayne Tower, 21<sup>st</sup> 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 December 15, 2015, the foregoing document was served via E-mail to: Thomas E. Messana, Esq., Thomas Zeichman, Messana, P.A., 401 East Las Olas Boulevard, Suite 1400, Ft. Lauderdale, FL 33301 ([tmessana@messana-law.com](mailto:tmessana@messana-law.com), [tmessana@bellsouth.net](mailto:tmessana@bellsouth.net), [mwslawfirm@gmail.com](mailto:mwslawfirm@gmail.com), [tzeichman@messana-law.com](mailto: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 ([lsamuels@bergersingerman.com](mailto:lsamuels@bergersingerman.com), [vleon@bergersingerman.com](mailto:vleon@bergersingerman.com), [emark@bergersingerman.com](mailto:emark@bergersingerman.com), [lyun@bergersingerman.com](mailto:lyun@bergersingerman.com), [drt@bergersingerman.com](mailto:drt@bergersingerman.com), [sweber@bergersingerman.com](mailto:sweber@bergersingerman.com), [mvega@bergersingerman.com](mailto:mvega@bergersingerman.com), [zhyman@bergersingerman.com](mailto:zhyman@bergersingerman.com), [clamb@bergersingerman.com](mailto:clamb@bergersingerman.com)); Peter G. Herman, Esq., Tripp Scott, 110 S.E. 6<sup>th</sup> Street, 15<sup>th</sup> Floor, Ft. Lauderdale, FL 33301 ([pgh@trippscott.com](mailto:pgh@trippscott.com), [rep@trippscott.com](mailto:rep@trippscott.com), [ele@trippscott.com](mailto:ele@trippscott.com)); Paul V. DeBianchi, Esq., Paul V. DeBianchi, P.A., 111 S.E. 12<sup>th</sup> Street, Ft. Lauderdale, FL 33316 ([Debianchi236@bellsouth.net](mailto:Debianchi236@bellsouth.net)); Gary A. Woodfield, Esq., Susan B. Yoffee, Esq., Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33408 ([gwoodfield@haileshaw.com](mailto:gwoodfield@haileshaw.com), [bpetroni@haileshaw.com](mailto:bpetroni@haileshaw.com), [eservices@haileshaw.com](mailto:eservices@haileshaw.com), [syoffee@haileshaw.com](mailto:syoffee@haileshaw.com), [cmarino@haileshaw.com](mailto: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](mailto:mtriggs@proskauer.com), [athomson@proskauer.com](mailto:athomson@proskauer.com), [florida.litigation@proskauer.com](mailto: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 ([bohunt@huntgross.com](mailto:bohunt@huntgross.com), [eservice@huntgross.com](mailto:eservice@huntgross.com), [Sharon@huntgross.com](mailto:Sharon@huntgross.com)) and Harry Winderman ([harry4334@hotmail.com](mailto:harry4334@hotmail.com)).

/s/ Jonathan Etra \_\_\_\_\_

Jonathan Etra, Esq.