

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA  
CASE NO. 12-034123(07)

P & S ASSOCIATES GENERAL  
PARTNERSHIP, etc. et al.,

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.

Defendants.

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**NOTICE OF PRODUCTION TO NON-PARTY UNDER RULE 1.351**

YOU ARE NOTIFIED that after ten (10) days from the date of service of this notice, if service is by delivery, or fifteen (15) days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue or apply to the clerk of this court for issuance of the attached subpoena directed to:

Atlas, Perlman, Trop & Borkson, P.A. , who is not a party and whose address is 350 East Las Olas Boulevard, Suite 1700, Fort Lauderdale, FL, to produce the items listed at the time and place specified in the subpoena.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing is being sent by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49 to all parties on the attached service list and my email and facsimile to Thomas M. Messana, Esq., Messana, P.A., Suite 1400, 401 east Las Olas Boulevard, Fort Lauderdale, FL 33301, facsimile no. (954) 712-7401 this 5<sup>th</sup> day of June, 2014.

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By: /s/ Gary A. Woodfield, Esq.

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**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

(Records May Be Mailed in Lieu of Deposition)

To: Atlas, Pearlman, Trop & Borkson, P.A.  
350 East Las Olas Boulevard, Suite 1700  
Fort Lauderdale, FL 33303

YOU ARE COMMANDED to appear at Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33418, on June 30, 2014 at 10:00 AM., and to have with you at that time and place the following:

**See Attached Exhibit A.**

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or

(3) object to this subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated this \_\_\_\_ day of June, 2014

FOR THE COURT

**HAILE, SHAW & PFAFFENBERGER, P.A.**

*Attorneys for Defendant*

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By: \_\_\_\_\_

Gary A. Woodfield, Esq.

FL Bar No. 563102

If you are a person with a disability who needs any accommodation in order to respond to this subpoena, you may request such assistance by contacting Robert G. Haile, Jr., Esq., Haile, Shaw & Pfaffenberger, P.A., 660 U.S. Highway One, Third Floor, North Palm Beach, FL 33418 at 561-627-8100.

## EXHIBIT A

1. All documents regarding all services You performed for or on behalf of P & S Associates General Partnership ("P&S") and or S & P Associates General Partnerships ("S&P"), including, but not limited to formation documents, partnership agreements and all amendments thereto.
  
2. All documents evidencing all communication You had with P&S and/or S&P, or anyone acting on their behalf.
  
3. All time records and/or billing records and billing statement or invoices for services rendered on behalf of P&S and/or S&P.