

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

PHILIP J. VON KAHLE, as Conservator of  
P&S Associates General Partnership and  
S&P Associates, General Partnership,

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

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**DEFENDANT FRANK AVELLINO'S NOTICE OF SERVING FIRST SET OF  
INTERROGATORIES TO PLAINTIFF**

Defendant, Frank Avellino, by and through his undersigned counsel, hereby gives notice of serving his First Set of Interrogatories upon Plaintiff, Philip J. Von Cahle, as Conservator of P&S Associates, General Partnership and S&P Associates, General Partnership, to be answered under oath and in writing, within thirty (30) days of service herein, in accordance with the Florida Rules of Civil Procedure 1.340.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of November, 2013, the foregoing document is being served on Thomas M. Messana, Esq, Massana, P.A., 401 East Las Olas Boulevard, Suite 1400, Fort Lauderdale, Florida 33301, [tmessana@messana-law.com](mailto:tmessana@messana-law.com), Etan Mark, Esq., Berger Singerman, 350 East Las Olas Blvd., Suite 1000, Fort Lauderdale, FL, 3330, [emark@bergersingerman.com](mailto:emark@bergersingerman.com), Peter G. Herman, Esq., 110 SE 6<sup>th</sup> Street, 15<sup>th</sup> Floor, Fort Lauderdale, FL 33301, [pgh@trippscott.com](mailto:pgh@trippscott.com); [asg@trippscott.com](mailto:asg@trippscott.com); [ele@trippscott.com](mailto:ele@trippscott.com); [rep@trippscott.com](mailto:rep@trippscott.com); and Mark F. Raymond, Esq. Jonathan Etra, Esq., and Christopher Cavallo,

Esq., Broad and Cassel, One Biscayne Tower, 21<sup>st</sup> Floor, 2 South Biscayne Blvd., Miami, FL 33131, [jetra@broadandcassel.com](mailto:jetra@broadandcassel.com); [ccavallo@broadandcassel.com](mailto:ccavallo@broadandcassel.com) and [mraymond@broadandcassel.com](mailto:mraymond@broadandcassel.com) by email and by electronic service via the Florida Courts E-Filing Portal in compliance with Fla. Admin. Order No. 13-49.

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By:     /s/     Gary A. Woodfield  
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