

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.: 07-43672 CA 09

STATE OF FLORIDA, OFFICE OF
FINANCIAL REGULATION,

Plaintiff,

v.

BERMAN MORTGAGE CORPORATION,
a Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation,
DANA J. BERMAN, as Owner and Managing
Member,

Defendants,

and,

DB ATLANTA, LLC, a Florida limited liability
company, et al.

Relief Defendants.

NOTICE OF SPECIAL SET HEARING
(15 minutes)

TO: All parties on certificate of service

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the
following:

DATE AND TIME: October 24, 2008 at 10:00 a.m. *JWC*
JUDGE: The Honorable Thomas J. Wilson, Jr.
PLACE: Dade County Courthouse
73 West Flagler Street, Room 626
Miami, Florida 33130

CASE NO.: 07-43672 CA 09

**MATTERS: INTERVENOR IRA SUKOFF'S MOTION FOR PROTECTIVE ORDER
AND
INTERVENOR IRA SUKOFF'S MOTION TO COMPEL**

MOVANT COUNSEL CERTIFIES that a bona fide effort to agree to narrow the issues on the Motion noticed hereby has been made with opposing counsel.

In accordance with the Americans with Disabilities Act of 1990, persons needing special accommodation to participate in this proceeding should contact the Court ADA Coordinator no later than seven (7) days prior to the proceedings. Telephone (305) 375-2006 for assistance; if hearing impaired, telephone (305) 375-2007 for assistance.

Respectfully submitted,
KAHN, CHENKIN & RESNIK, P.L.
Attorneys for Intervenor
IRA SUKOFF
1815 Griffin Road
Suite 207
Dania, Florida 33004
(954) 321-0176
(954) 321-0177 - Fax

By: _____
HOWARD N. KAHN, ESQ.
Fla. Bar No: 0724416

CASE NO.: 07-43672 CA 09

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail and facsimile to: **Cristina Saenz, Esq.**, Assistant General Counsel, State of Florida, Office of Financial Regulation, 401 N.W. 2nd Avenue, Suite N-708, Miami, Florida 33128; **Alan M. Sandler, Esq.**, Counsel for Defendants Joel and Deborah Sokol, Darlene Levasser, Robert Dzimidas IRA, Lawrence Meyer IRA, Lawrence Meyer Roth IRA and Mary Joe Meyer Roth IRA, of Sandler & Sandler, 117 Aragon Avenue, Coral Gables, Florida 33134; **Allan A. Joseph, Esq.**, Counsel for The Amid Companies and Amedia Family Investors, David & Joseph, P.L., 1001 Brickell Avenue, Suite 2002, Miami, Florida 33131; **Richard R. Robles, Esq.**, Counsel for the Four Ambassadors Association, Inc., Law Offices of Richard R. Robles, P.A., 905 Brickell Bay Drive, Tower II, Mezzanine, Suite 228, Miami, Florida 33131; **Lawrence M. Shoot, Esq.**, Counsel for USA Funding Mortgage, Inc., 4830 S.W. 92nd Avenue, Miami, Florida 33165; **James D. Gassenheimer, Esq.**, Counsel for the Receiver, Michael I. Goldberg, Berger Singerman, 200 S. Biscayne Boulevard, Suite 1000, Miami, Florida 33131; and **Daniel Kaplan, Esq.**, Counsel for Defendant Berman, 2875 N.E. 191st Street, Suite 600, Aventura, Florida 33180; this 20th day of October, 2008.



HOWARD N. KAHN

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a Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation,
DANA J. BERMAN, as Owner and Managing
Member,

Defendants,

and,

DB ATLANTA, LLC, a Florida limited liability
company, et al.

Relief Defendants.

INTERVENOR IRA SUKOFF'S MOTION FOR PROTECTIVE ORDER

PLEASE TAKE NOTICE that Intervenor IRA SUKOFF ("SUKOFF"), by his undersigned counsel files this, his Motion for Protective Order, pursuant to Fla.R.Civ.P. 1.280, based upon the following grounds:

1. On or about October 13, 2008, counsel for SUKOFF received a Notice of Taking Deposition Duces Tecum of SUKOFF from Receiver MICHAEL I. GOLDBERG ("RECEIVER") for October 20, 2008, knowing full well that SUKOFF resides in Chile. SUKOFF is not

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expected to return to the United States until mid-December, 2008.

2. Although **SUKOFF's** Verified Motion for Dismissal of Relief Defendant Normandy Holdings, II, LLC from Receivership Proceeding was served on September 20, 2008, the **RECEIVER** made no effort to contact the undersigned counsel to coordinate the scheduling of **SUKOFF's** deposition prior to this time. (Paragraph "3" of the **RECEIVER's** Motion makes reference to only having received the Notice of Filing the Original Verification of **SUKOFF** on October 10, 2008, although a copy of the verification was attached to the aforementioned Motion served on September 20, 2008).

3. The **RECEIVER** cites to the temporary injunction order for permission to take the deposition on five (5) days notice. However, there is no emergency present or harm posed to the **RECEIVER** to justify the use of this extraordinary relief, only a complete lack of any justifiable basis for the deposition to proceed. Contrary to numerous of the Relief Defendants, Normandy Holdings, II, LLC was a for profit real estate venture selling properties and yielding substation profits to NH,II investors. Unlike the other Relief Defendants, NH, II, never obtained loans from Defendant **M.A.M.C. INCORPORATED ("MAMC")**, and **SUKOFF** had no involvement whatsoever with **MAMC**.

4. While the **RECEIVER** claims that certain monies were distributed by **MAMC** to **NH, II**, in fact, the monies were actually distributed directly by **MAMC** to investors of **NH, II** whom the **RECEIVER** has chosen to exclude from this proceeding.

5. Additionally, on or about July 14, 2008, **SUKOFF** propounded discovery upon the **RECEIVER**, which despite requesting extensions of time, has not been responded to as far as

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the basis of any claims against **SUKOFF**.

6. There can be no doubt that the **RECEIVER's** efforts to take **SUKOFF's** deposition is only offered for purposes of delay because the **RECEIVER** cannot assert any claims against **SUKOFF**. As a consequence thereof, there is also no need for **SUKOFF** to be deposed, absent a showing of good cause by the **RECEIVER**.

7. Moreover, in the event that the **RECEIVER** insists on taking **SUKOFF's** deposition prior to his return to the United States, the **RECEIVER** is more than welcomed to either travel to Chile to do so, or bear the costs associated with **SUKOFF** traveling to the United States for said deposition.

8. Pursuant to Fla.R.Civ.P. 1.380(a)(2), the undersigned counsel certifies that a bona fide effort to agree to narrow the issues on the instant Motion has been made with opposing counsel and that the undersigned counsel has conferred with opposing counsel relative to this Motion.

WHEREFORE, Intervenor **IRA SUKOFF** respectfully requests that this Court grant the relief sought herein together with such other and further relief this Court deems just and proper.


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Respectfully submitted,

KAHN, CHENKIN & RESNIK, P.L.
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IRA SUKOFF
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(954) 321-0177 Fax

By: _____


HOWARD N. KAHN, ESQ.
Fla. Bar No: 0724416

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CERTIFICATE OF SERVICE

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HOWARD N. KAHN

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a Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation,
DANA J. BERMAN, as Owner and Managing
Member,

Defendants,

and,

DB ATLANTA, LLC, a Florida limited liability
company, et al.

Relief Defendants.

INTERVENOR IRA SUKOFF'S MOTION TO COMPEL

PLEASE TAKE NOTICE that, Intervenor IRA SUKOFF ("SUKOFF"), by his undersigned counsel, shall move this Court to enter an Order compelling Receiver MICHAEL I. GOLDBERG ("RECEIVER"), to serve an answer to SUKOFF's First Set of Interrogatories, based upon the following grounds:

1. On July 14, 2008, SUKOFF served his First Set of Interrogatories upon RECEIVER, wherein RECEIVER's answers were due on or before August 18, 2008. A

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True and correct copy of the First Set of Interrogatories is attached hereto as Exhibit "A".

3. To date, the **RECEIVER** has failed to serve its answers to **SUKOFF's** First Set of Interrogatories.

5. Pursuant to Fla.R.Civ.P. 1.380(a)(4), the undersigned counsel certifies that a bona fide effort to agree to narrow the issues on the instant Motion has been made with opposing counsel and that the undersigned counsel has conferred with opposing counsel relative to this Motion.

WHEREFORE, Intervenor, **IRA SUKOFF**, respectfully requests that this Court enter an Order compelling Receiver **MICHAEL I. GOLDBERG** to serve the answers to the First Set of Interrogatories, together with such other and further relief as this Court deems just and proper.

Respectfully submitted,
KAHN, CHENKIN & RESNIK, P.L.
Attorneys for Intervenor
IRA SUKOFF
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Dania, Florida 33004
(954) 321-0176
(954) 321-0177 - Fax

By: _____
HOWARD N. KAHN, ESQ.
Fla. Bar No: 0724416

CASE NO.: 07-43672 CA 09

CO-COUNSEL:
MARCY S. RESNIK, ESQ.
KAHN, CHENKIN & RESNIK, P.L.
1815 Griffin Road
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Tel: (954) 522-4129
Fax: (954) 522-4522

CASE NO.: 07-43672 CA 09

CERTIFICATE OF SERVICE

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HOWARD N. KAHN

Exhibit "A"

IN THE CIRCUIT COURT OF THE
13 JUDICIAL CIRCUIT IN AND FOR
MIAMI DADE COUNTY, FLORIDA

CASE NO. 07-43572 CA 00

STATE OF FLORIDA, OFFICE OF
FINANCIAL REGULATION,

Plaintiff,

BERMAN MORTGAGE CORPORATION,
a Florida corporation, M.A.M.C.
INCORPORATED, a Florida corporation,
DANA J. BERMAN, as Owner and Managing
Member,

Defendants,

and

DB ATLANTA, LLC, a Florida limited liability
company, et al.

Relief Defendants.

**NOTICE OF SERVICE OF INTERVENOR IRA SUKOFF'S
FIRST SET OF INTERROGATORIES TO RECEIVER MICHAEL I. GOLDBERG**

Intervenor **IRA SUKOFF**, ("**SUKOFF**"), by his undersigned counsel, hereby
gives notice of the service of Interrogatories "1" through "9" to **Receiver MICHAEL
GOLDBERG** ("**RECEIVER**"), pursuant to Fla. R. Civ. P. 1.340(a), which
interrogatories must be answered within thirty (30) days after service hereof, in

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CASE NO. 07-45672 CA 09

Order of Civil Procedure

Respectfully submitted,
KAHN, CHENKIN & RESNIK, P.L.
Attorneys for Intervenor
IRA SUKOFF
1815 Griffin Road
Suite 207
Dania, Florida 33004
(954) 321-0176
(954) 321-0177 - Fax

By: _____
HOWARD N. KAHN, ESQ.
Fla. Bar No: 0724416

CERTIFICATE OF SERVICE

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CASE NO.: 07-43672 CA 09

INSTRUCTIONS

1. In each of your answers to Interrogatories, you are requested to provide not only information as is in your possession, but also all information as is reasonably available, whether or not it is in your possession. In the event you are able to provide only part of the information called for by any particular Interrogatory, provide all of the information you are able to provide, and state the reason for your inability to state the remainder.
2. If you object to, or otherwise decline to answer any portion of the Interrogatories, please provide all information called for in that portion of the Interrogatory to which you do not object or to which you do not decline to answer. If you object to the Interrogatory on the ground that it is too broad (i.e., that it calls both for information which is relevant to the subject matter of the action and for information which is not relevant), please provide such information as you concede to be relevant. If you object to the Interrogatory on the ground that it would constitute an undue burden to provide an answer, please provide such requested information as can be supplied without undertaking such undue burden. For those portions of any Interrogatory to which you object or otherwise decline to answer, state the reason for such objection or declination.

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DEFINITIONS

1. "Document" shall mean any written or graphic matter or other means of preserving thought or expressions and all tangible things from which information can be processed or transcribed, including the originals and all non-identified copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, letters, telegrams, teletypes, telefax, bulletins, e-mails, telecopier, meetings or other communications, inter-office and intra-office telephone calls, diaries, chronological date, minutes, books, reports, studies, summaries, pamphlets, bulletins, printed matter, charts, invoices, work sheets, receipts, returns, computer print-outs, prospectuses, financial statements, schedules, affidavits, contracts, security agreements, financing statements, promissory notes, mortgages, canceled checks, statements, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphic or other oral records or representations of any kind (including without limitation photographs, microfiche, microfilm, video tape, records and motion pictures), and electronic, mechanical or electric records or representations of any kind (including without limitation tapes, cassettes, discs and records).

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2. As used herein, "RECEIVER" shall mean Receiver **MICHAEL I. GOLDBERG**.
3. As used herein, "NORMANDY" shall mean Defendants **NORMANDY HOLDINGS, II, LLC** and **NORMANDY HOLDINGS, III, LLC**.
4. As used herein, "SUKOFF" shall mean Intervenor **IRA SUKOFF**.
5. "Electronic Data" as used herein shall mean the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmissions notations or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, or other means. Electronic data includes, by way of example only, computer programs (whether private, commercial or work-in-progress), programming notes or instructions, activity listing of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether said electronic data consists in active file, deleted

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Electronic data includes any and all terms stored on computer memories, hard disks, floppy disks, CD-ROMs, removable media such as Bernoulli Boxes and their equivalent, magnetic tapes of all types, microfiche, punched cards, punched tape, computer chips, including, but not limited to EPROM, PROM, RAM, and ROM, on or in any other vehicle for digital data storage and/or transmittal. Electronic data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

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INTERROGATORIES

Please identify the names and addresses of each and every individual providing information to respond to these Interrogatories and the factual basis for each individual's response to said Interrogatories and identify each and every Document or Electronic Data which refers or relates thereto.

2. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings filed in this action relating directly or indirectly to **NORMANDY**, or any fact underlying the subject matter of this action relating directly or indirectly to **NORMANDY** and identify each and every Document and/or Electronic Data that refers or relates thereto.

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Please state the name of each person whom you believe the *person(s)* identified in your response to interrogatory no. 1 may have and identify each and every Document and/or Electronic Data that refers or relates thereto.

1. Please provide the name of each person whom you may use as an expert witness at trial and identify each and every Document and/or Electronic Data that refers or relates thereto.

CASE NO.: 07-43672 CA 09

Please state in detail the substance of the opinions to be provided by each person whom you may use as an expert witness at trial and identify each and every Document and/or Electronic Data that refers or relates thereto.

6. Please state each item of damages that you claim, and include in your answer: the count to which the item of damages relates; the category into which each item of damages falls, i.e. general damages, special or consequential damages (such as lost profits), interest, and any other relevant categories; the factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used and identify each and every Document and/or Electronic Data that refers or relates thereto.

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Please identify each document (including electronically stored information or pertinent insurance agreements) pertaining to any fact alleged in any pleading and identify each and every Document and/or Electronic Data that refers or relates thereto.

8. Please state the factual basis that **SUKOFF** is an "insider" as stated by James Gassenhiemer, Esq., before the Honorable Thomas Wilson at the hearing held on June 23, 2008 and identify each and every Document and/or Electronic Data that refers or relates thereto.

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Please state the factual basis for any claim you have against **SUKOFF** or any other manager or member of **NORMANDY** and identify each and every Document and/or Electronic Data that refers or relates thereto.

MICHAEL I. GOLDBERG, Receiver

STATE OF FLORIDA)

) SS:

COUNTY OF MIAMI-DADE)

BEFORE ME, this ___ day of _____, 2008 the undersigned authority personally appeared **MICHAEL I. GOLDBERG** who is personally know to me or who has produced _____ as identification, who, upon being first duly sworn deposes and states that he has read the above and foregoing answers to interrogatories and states that the responses are true and correct.

Print name: _____

Signature: _____

NOTARY PUBLIC, STATE OF _____

Commission No.: _____

My Commission Expires: _____

(SEAL)

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