

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

GRISEL ALONSO, as Receiver for
Elm Tree Investment Advisors, LLC,
Elm Tree Investment Fund, LP,
Elm Tree 'e'Conomy Fund, LP, and
Elm Tree Motion Opportunity, LP,

Case No. 16-62603-CIV-DIMITROULEAS
Proceeding Ancillary to
No. 15-CV-60082-Dimitrouleas/Snow

Plaintiff,

v.

JAMES BENVENUTO, an individual,
NGU INVESTORS, LLC, a Florida limited
liability company; JEAN BENVENUTO, an
individual, SURJIT WALIA, an individual,
S.W. EQUITIES CORP., a New York corporation,
TIMOTHY HARTMANN, an individual,
ALEXANDER BUKHSHTABER, an individual,
MVS MEDIA GROUP, LLC, a Florida limited
liability company, HARRY TAWIL, an individual,
EDUARDO DOS SANTOS, an individual,
FILOMENA CALABRIA, an individual,
JOSE ROFFE, an individual, MIREILLE ROFFE,
an individual, SOMESWARI NUKALA, an individual,
Yael TAPIERO, an individual, LAAS W. TURNBULL,
an individual, OMRI TINTPULVER, an individual,
CONSTANTINO DOS SANTOS, an individual,
ARMAND DELMAR, an individual, AHMAD NAQVI,
an individual, MERCEDES ELMALEH, an individual,
ELIA BLUMIN, an individual, TED GREENWALD,
an individual, ALINA TALSKY, an individual,
ELVIS PERVAN, an individual,
ANGELO ISMIRNIOGLOU, an individual, and
JONATHAN VERK, an individual.

Defendants.

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the undersigned attorneys, pursuant to Rule 30(b)(1) of
the Federal Rules of Civil Procedure, intend to take the deposition of:

CASE NO.: 16-cv-62603-DIMITROULEAS/SNOW

<u>NAME AND ADDRESS</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
Timothy Hartmann c/o Lorne E. Berkeley, Esq. Adam H. Levit, Esq. Daniels Rodriguez Berkeley Daniels & Cruz, P.A. 4000 Ponce de Leon Blvd., Suite 800 Coral Gables, Florida 33146	February 1, 2018 9:30 a.m.	Broad and Cassel LLP One Biscayne Tower 2 S. Biscayne Boulevard Suite 2100 Miami, FL 33131

upon oral examination before a court reporter, any other Notary Public or other officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. The deposition is being taken for purposes of discovery or such other purposes as are permitted under the Federal Rules of Civil Procedure.

Dated: January 12, 2018

Respectfully submitted,

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cc: Fernandez & Associates Court Reporters

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 12, 2018, a true and correct copy of the foregoing was served via electronic transmission on all counsel or parties of record.

By: s/Daniel S. Newman
Daniel S. Newman, P.A.