

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

FOURTH DISTRICT

CASE NO. 4D16-2972

DFG GROUP, LLC, ARTHUR FALCONE,  
AND EDWARD FALCONE,

Appellants/Cross-Appellees,

-vs-

HERITAGE MANOR OF MEMORIAL  
PARK, INC.; MEMORIAL PARK OF BOCA  
RATON, INC.; SANDRA STRONG, as  
Personal Representative of the ESTATE OF  
KATHLEEN I. MICHAEL; ELISHKA E.  
MICHAEL TARNAWA REVOCABLE  
TRUST UNDER AGREEMENT DATED  
AUGUST 9, 2002; LAILA TAYLOR,  
TRUSTEE; and LAILA TAYLOR, as Personal  
Representative of the ESTATE OF ELISHKA  
E. MICHAEL TARNAWA,

Appellees/Cross-Appellants.

\_\_\_\_\_/

NOTICE TO INVOKE

NOTICE IS GIVEN that Appellees/Cross-Appellants, HERITAGE MANOR  
OF MEMORIAL PARK, INC., MEMORIAL PARK OF BOCA RATON, INC.,  
SANDRA STRONG, as Personal Representative of the ESTATE OF KATHLEEN  
I. MICHAEL, ELISHKA E. MICHAEL TARNAWA REVOCABLE TRUST  
UNDER AGREEMENT DATED AUGUST 9, 2002, LAILA TAYLOR,

TRUSTEE, and LAILA TAYLOR, as Personal Representative of the ESTATE OF ELISHKA E. MICHAEL TARNAWA, by and through undersigned counsel, invoke the discretionary jurisdiction of the Florida Supreme Court to review the decision of this Court rendered on January 24, 2018 (copy attached), rendered final by the order denying Appellees/Cross-Appellants' Motion for Rehearing and Certification dated March 13, 2013. The decision of the District Court of Appeal expressly and directly conflicts with the decision of another District Court of Appeal or of the Supreme Court of Florida on the same question of law.

I HEREBY CERTIFY a true copy of the foregoing was furnished to all counsel  
on the attached service list, by email, on April 11, 2018.

Michael J. Avenatti, Esq.  
Scott H. Sims, Esq.  
EAGAN AVENATTI, LLP  
520 Newport Center Drive, Suite 1400  
Newport Beach, CA 92660  
mavenatti@eaganavenatti.com  
ssims@eaganavenatti.com  
jregnier@eaganavenatti.com  
kmosby@eaganavenatti.com  
mbicknell@eaganavenatti.com

and

Edward M. Ricci, Esq.  
EDWARD M. RICCI, P.A.  
6650 W. Indiantown Road, Suite 200  
West Palm Beach, FL 33458  
edricci@edriccilaw.com  
jlee@edriccilaw.com

and

BURLINGTON & ROCKENBACH, P.A.  
Courthouse Commons/Suite 350  
444 West Railroad Avenue  
West Palm Beach, FL 33401  
(561) 721-0400  
Attorneys for Appellees/Cross-Appellants  
bdr@FLAppellateLaw.com  
fa@FLAppellateLaw.com

By: /s/ Bard D. Rockenbach  
BARD D. ROCKENBACH  
Florida Bar No. 771783

/fa

**SERVICE LIST**

DFG Group, LLC, et al. v. Heritage Manor of Memorial Park, etc., et al.  
Case No. 4D16-2972

**William J. Cornwell, Esq.**  
wjc@weissandhandlerpa.com  
filings@weissandhandlerpa.com  
dkf@weissandhandlerpa.com  
Weiss, Handler,  
Angelos & Cornwell, P.A.  
2255 Glades Rd., Ste. 218-A  
Boca Raton, FL 33431  
(561) 997-9995  
Attorneys for Appellants/Cross-  
Appellees, DFG Group, LLC, Arthur  
Falcone & Edward Falcone