Florida Department of State

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ASPEN GARDEN, LTD.

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CERTIFICATE OF LIMITED PARTNERSHIP

OF

ASPEN GARDEN, LTD.

Pursuant to the Plorida Revised Uniform Limited Partnership Act of 2005, the undersigned, being the sole General Partner of Aspen Garden, Ltd., a Florida limited partnership (the "Partnership"), hereby executes and submits for filing with the Department of State, State of Florida, this Certificate of Limited Partnership, to read as follows:

1. The name of the Limited Partnership is:

ASPEN GARDEN, LTD.

2. The mailing address and the street address of the Partnership is

9400 S. Dadeland Boulevard, Suite 100 Miami, Florida 33156

3. The name and address of the agent for service of process on the Partnership

are:

Brian J. McDonough 2200 Museum Tower 150 West Flagler Street Mismi, Florida 33130

4. The name and address of the General Partner of the Partnership are:

PHG - Aspen, LLC 9400 S. Dadeland Boulevard, Suite 100 Miami, Florida 33156 LGG - 210 80

IN WITNESS WHEREOP, the undersigned has signed this Certificate of Limited Partnership as General Partner, pursuant to the provisions of Section 620.1204 of the Florida Revised Uniform Limited Partnership Act of 2005.

DATED: February 34, 2008

PHG - Aspen, LLC, a Florida limited liability company, General Partner

David O. Deutch, Vice President

ACCEPTANCE OF APPOINTMENT OF REGISTERED AGENT

I, Brian J. McDonough, hereby accept my appointment as registered agent for ASPEN GARDEN, LTD., a Florida limited partnership. I further agree to comply with the provisions of all statutes relative to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent.

DATED: February 29, 2008

Brian J. McDonough

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TALLAHASSEE, FLORIDA