

**IN THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR MANATEE COUNTY, FLORIDA  
CIVIL DIVISION**

MARY LOU SMITH  
an individual, and  
SHARON DENSON,  
an individual

Plaintiffs,

vs.

CASE NO.: 08 CA 11315  
Division B

TRAILER ESTATES PARK AND  
RECREATION DISTRICT,  
an independent special taxing district,  
JANET JONES, an individual,  
JOHN VANDERMOLEN, an individual,  
JOSEPH SALERNO, an individual, and  
MARY LOU MCNULTY, an individual

Defendants.

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**AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM**  
**(Amended as to location)**

PLEASE TAKE NOTICE that counsel for the Plaintiffs, MARY LOU SMITH and SHARON DENSON, will take the following deposition:

**NAME:** Trailer Estates Park and Recreation District's Custodian of Public Records (TJ Miller)

**DATE:** April 17, 2009

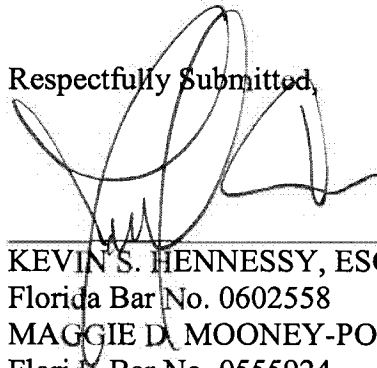
**TIME:** 1:00 PM

**PLACE:** Kirk Pinkerton, P.A.  
1301 6<sup>th</sup> Avenue West  
Suite 401  
Bradenton, FL 34205

upon oral examination before Executive Court Reporting, a Court Reporter authorized by law in the State of Florida to take depositions. This oral examination will continue from day to day until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure.

**The documents listed on Exhibit "A" attached hereto shall be brought to the deposition.**

Respectfully Submitted,



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KEVIN S. HENNESSY, ESQUIRE

Florida Bar No. 0602558

MAGGIE D. MOONEY-PORTALE, ESQUIRE

Florida Bar No. 0555924

JENNIFER R. COWAN

Florida Bar No. 0038081

Lewis, Longman & Walker, P.A.

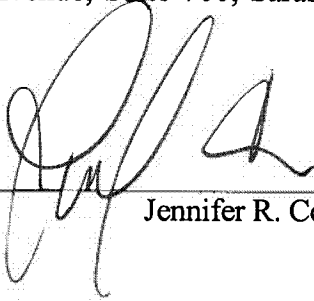
1001 3<sup>rd</sup> Avenue West, Suite 670

Bradenton, Florida 34205

Telephone (941) 708-4040

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to **Hunter Carroll, Esquire**, Matthews, Eastmoore, Hardy, Crauwels & Garcia, P.A., 1777 Main Street, Suite 500, Sarasota, FL 34236, **James D. Dye, Esquire**, Dye, Deitrich, Petruff, & St. Paul, 1111 Third Ave. West, Suite 300, Bradenton, FL 34205, **Robert E. Turffs, Esquire**, 1444 First Street, Suite B, Sarasota, FL 34236, **Robert J. Gill, Esquire**, Ruden McClosky, Smith, Schuster & Russell, P.A., 1515 Ringling Blvd., Suite 700, Sarasota, FL 34236, **Thomas D. Shults, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *U.S. First Class Mail*, this 20<sup>th</sup> day of March, 2009.



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Jennifer R. Cowan

**EXHIBIT "A"**

Any and all documentation in your possession that has not previously been produced to counsel for the Plaintiffs including but not limited to the following:

1. Any and all documents not previously produced in response to Plaintiff's December, 12, 2008, Request for Production.
2. Any and all documents (including but not limited to all notes, memos, or emails) whether in electronic or written format, relating to the Trailer Estates Park and Recreation District's ("District") Executive Committee, Administrative Committee, and/or Executive Board, from January 1, 2006, to the present.
3. Any and all letters, memos, or emails between you and any previous or existing member of the Board of Trustees for the District, whether in electronic or written format, from January 1, 2006, to the present.
4. Any and all telephone, including cellular phone, records and invoices or bills of the District from January 1, 2006, to the present.
5. Any and all documents reflecting communication between the Board of Trustees for the District from January 1, 2006 to the present.
6. Any and all calendars from January 1, 2006, to the present, whether in electronic or written format, depicting any meetings between persons who have served or are serving on the District's Board of Trustees.
7. Any and all documents that claim an exemption to the public records law responsive to the public records requests alleged in the complaint.
8. Any and all public records withheld and complained of in the complaint.