

IN THE CIRCUIT COURT FOR MANATEE COUNTY, FLORIDA

MARY LOU SMITH,
AN INDIVIDUAL, AND
SHARON DENSON,
AN INDIVIDUAL

Plaintiffs,

v.

CASE NO.: 2008 CA 11315

TRAILER ESTATES PARK
AND RECREATION DISTRICT,
AN INDEPENDENT SPECIAL
TAXING DISTRICT, and others,

Defendants.

DEFENDANT, JOHN VANDER MOLEN,
LIST OF WITNESSES AND EXHIBITS

Defendant, JOHN VANDER MOLEN, files his list of witnesses and exhibits he intends to use at the trial of the above designated action as follows:

I. WITNESSES

1. John Vander Molen, 6807 Massachusetts St., P.O. Box 6453, Bradenton, Florida 34281.
2. Janet Jones, 2216 Pennsylvania Ave., Bradenton, Florida 34207.
3. Mary Lou McNulty, 1806 Ohio St., Bradenton, Florida 34207.
4. Joseph Salerno, c/o Robert E. Truffs, Esq., Robert E. Truffs, P.A., 1444 First Street, Suite B, Sarasota, Florida, 34236.
5. Representative of Trailer Estates Park & Recreational District, P.O. Box 6298, Bradenton, Florida 34281.

6. Martha Brauer, c/o Thomas D. Shults, Esq., Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, Florida 34236.
7. Jennifer Cowen, Esq., Lewis, Logan, Walker, P.A. 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205.
8. Louis Ursini, III, Esq., Ruden, McClosky, et. al., 1515 Ringling Boulevard, Sarasota, Florida 34236.
9. Jason T. Gaskill, Esq., Ruden, McClosky, et. al., 1515 Ringling Boulevard, Sarasota, Florida 34236.
10. T.J. Miller, Office Manager, P.O. Box 6298, Bradenton, Florida 34281.
11. Mark P. Barnebey, 216 21st St. West, Bradenton, Florida.
12. Sharon Denson, 1613 Illinois Ave., Manatee, Florida.
13. Mary Lou Smith, 6907 Tarpoon Lane, Manatee, Florida.
14. Any person deposed in this lawsuit.
15. Any and all witnesses identified by either plaintiffs or any of the defendants.
16. All witnesses that may become known through the course of further discovery.
17. Any and All witnesses whose names appear in answers to interrogatories, depositions and other discovery on file in this case.
18. Any and all expert witnesses retained by the parties.

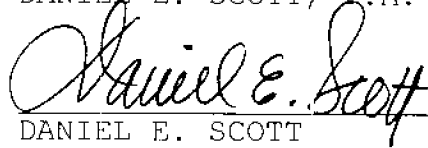
II. EXHIBITS.

1. Depositions of the parties and witnesses, including video tapes and any and all exhibits referenced in or attached to the deposition transcripts.
2. Any and all interrogatories and answers to interrogatories filed in this case or portions thereof.

3. Any and all documents received from plaintiff in response to discovery requests.
4. Reports of experts.
5. All documents listed by Plaintiff, in Plaintiff's Exhibit List.
6. All documents listed by Defendant, Joseph Salerno, in Defendant's Exhibit List.
7. All documents listed by Defendant, Janet Jones, in Defendant's Exhibit List.
8. All documents listed by Defendant, Mary Lou McNulty, in Defendant's Exhibit List.
9. All documents listed by Defendant, Trailer Estates Park and Recreational District, in Defendant's Exhibit List.
10. Any and all applicable Statutes or Ordinances.
11. Any and all treatises, textbooks and manuals used by any party hereto.
12. Any document regarding any allegations of the plaintiffs not specifically set forth above.
13. Defendant reserves the right to add to this exhibit list pending ongoing discovery.
14. All documents attached to the complaint and amended complaint.
15. Mr. Vander Molen's calendar.
16. Mr. Vander Molen's telephone bills.
17. Agenda and minutes of all Trailer Estates board of Trustee meetings.
18. All documents exchanged in discovery.
19. All pleadings and discovery requests and responses.
20. Any and all exhibits reference by any of the plaintiffs or other defendants.
21. Any and all exhibits listed by any party to this action.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Kevin Hennessey, Robert E. Truffs, Thomas D. Shults, James D. Dye and Hunter Carrol, by mail, on July 27, 2009.

DANIEL E. SCOTT, P.A.

A handwritten signature in cursive script that reads "Daniel E. Scott". The signature is written in black ink and is positioned above a horizontal line.

DANIEL E. SCOTT
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Attorney for Defendant,
Vander Molen

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