

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

FILED FOR RECORD
R.B. SHORE
2009 JUL 28 PM 3:22
CLERK OF CIRCUIT COURT
MANATEE CO. FLORIDA

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.

PLAINTIFFS' EXHIBIT LIST

Plaintiff, MARY LOU SMITH and SHARON DENSON by and through the undersigned attorneys, hereby files this exhibit list and gives notice that the following materials are expected to be called to be used at trial:

1. All Documents attached to the Amended Complaint.
2. Executive Committee Meeting Minutes, August 23, 2004.
3. Board Meeting Minutes, March 21, 2005.
4. Board Meeting Minutes, November 21, 2005.
5. Board Meeting Minutes, December 2005.
6. Board Meeting Minutes, January 3, 2006.

7. Board Meeting Minutes, May 16, 2006.
8. Executive Committee Meeting Minutes, May 24, 2006.
9. Board Meeting Minutes, June 5, 2006.
10. Executive Committee Meeting Minutes, June 16, 2006.
11. Board Meeting Minutes, June 19, 2006.
12. Executive Committee Meeting Minutes, July 27, 2006.
13. Board Meeting Minutes, August 7, 2006.
14. Executive Committee Meeting Minutes, September 5, 2006.
15. Board Meeting Minutes, September 5, 2006.
16. Board Meeting Minutes, October 16, 2006.
17. Board Meeting Minutes, December 14, 2006.
18. Board Meeting Minutes, December 18, 2006.
19. Workshop Meeting Minutes, December 27, 2006.
20. Board Meeting Minutes, February 2, 2007.
21. Board Meeting Minutes, February 5, 2007.
22. Janet Jones Memorandum to Trustees, February 12, 2007.
23. Board Meeting Minutes, March 12, 2007.
24. Board Meeting Minutes, May 21, 2007.
25. Board Meeting Minutes, June 4, 2007.
26. Board Meeting Minutes, July 16, 2007.
27. Board Meeting Minutes, October 18, 2007.
28. Board Meeting Minutes, January 7, 2008.
29. Board Meeting March 10, 2008.

30. Board Meeting Minutes, March 17, 2008.
31. Board Meeting Minutes, March 18, 2008.
32. Board Meeting Minutes, April 21, 2008.
33. Board Meeting Minutes, June 9, 2008.
34. Board Meeting Minutes, December 15, 2008
35. Board Meeting Minutes, January 5, 2009.
36. Architectural Review Committee Meeting Minutes, January 9, 2009.
37. Board Meeting Minutes, January 19, 2009.
38. Architectural Review Committee Meeting Minutes, January 23, 2009.
39. Board Meeting Minutes, January 26, 2009.
40. Architectural Review Committee Meeting Minutes, January 30, 2009.
41. Board Meeting, February 2, 2009.
42. Board Meeting Minutes, February 9, 2009.
43. Architectural Review Committee Meeting Minutes, February 13, 2009.
44. Board Meeting Minutes, February 16, 2009.
45. Architectural Review Committee Meeting Minutes, February 22, 2009.
46. Board Meeting Minutes, February 25, 2009.
47. Board Meeting Minutes, March 9, 2009.
48. Architectural Review Committee Meeting Minutes, March 13, 2009.
49. Board Meeting Minutes, March 16, 2009.
50. Architectural Review Committee Meeting Minutes, April 10, 2009.
51. Board Meeting Minutes, April 14, 2009.
52. Janet Jones Note, Not dated.

53. Mary Lou McNulty Memorandum to Trustees, December 4, 2006.
54. Janet Jones Memorandum to Trustees, May 20, 2008.
55. John Vandermolen Memorandum, March 18, 2008.
56. Email Correspondence from Martha Brauer to Ed Ogle, January 3, 2009.
57. Martha Brauer Letter to Dan Smith, January 27, 2009.
58. Memorandum from Martha Brauer to Trustees, February 17, 2009.
59. Letter from Board Appointing Moderator, October 19, 2007.
60. Letter from Board Appointing Moderator, October 27, 2008.
61. Letter from John Vandermolen to Sharon Denson, July 3, 2008.
62. Memorandum from Janet Jones to Trustees, January 9, 2007.
63. Memorandum from Janet Jones, January 10, 2007.
64. Memorandum from Janet Jones to Trustees, January 10, 2007.
65. Memorandum from Janet Jones to Trustees, February 12, 2007.
66. Memorandum from Janet Jones to Trustees and Residents, February 12, 2007.
67. Memorandum from Janet Jones to Trustees, March 6, 2007.
68. Memorandum from Janet Jones and Policy and Procedure Committee to Trustees, March 23, 2007.
69. Memorandum from Janet Jones to Trustees, April 4, 2007.
70. Memorandum from Janet Jones to Trustees, April 6, 2007.
71. Memorandum from Janet Jones to Trustees, April 18, 2007.
72. Memorandum from Janet Jones to Trustees, April 18, 2007.
73. Memorandum from Janet Jones to Trustees, April 26, 2007.
74. Memorandum from Janet Jones to Pamela Cole, April 30, 2007.

75. Memorandum from Janet Jones to Trustees, October 22, 2007.
76. Memorandum from Janet Jones to Nancy Bignell, November 13, 2007.
77. Memorandum from Janet Jones to Bruce Smith, December 7, 2007.
78. Memorandum from Janet Jones to Trustees, December 12, 2007.
79. Memorandum from Janet Jones to Trustees, December 31, 2007.
80. Memorandum from Janet Jones to Trustees, January 15, 2008.
81. Memorandum from Janet Jones to Trustees, January 18, 2008.
82. Memorandum from Janet Jones to Bruce Smith, January 23, 2008.
83. Memorandum from Janet Jones to Trustees, February 6, 2008.
84. Memorandum from Janet Jones to Trustee Smith, CC Board of Trustees, and Office Staff,
February 29, 2008.
85. Memorandum from Janet Jones to Trustees.
86. Memorandum from John Vandermolen to Trustees, June 4, 2007.
87. Memorandum from John Vandermolen to Trustees, June 14, 2007.
88. Note from Fred Hoch to Martha Brauer, February 5, 2009.
89. Email Correspondence from Mary Lou McNulty to Janet Jones, July 20, 2007.
90. Email Correspondence from Janet Jones to Mary Lou McNulty, August 21, 2007.
91. Memorandum from Janet Jones to Trustees, March 23, 2007.
92. Memorandum from Bruce Smith to Janet Jones, March 27, 2007.
93. Memorandum from Bruce Smith to Janet Jones, December 12, 2007.
94. Memorandum from Janet Jones to Bruce Smith, December 12, 2007.
95. Email Correspondence between Janet Jones and Mary Lou McNulty, January 26, 2006.
96. Memorandum from Janet Jones to Trustees, February 6, 2008.

97. Memorandum from Janet Jones to Sharon Denson, February 6, 2008.
98. Memorandum from John Vandermolen, June 13, 2008.
99. Email from Sharon Denson to T.J. Miller, August 5, 2008.
100. Email Correspondence from Martha Brauer to T.J. Miller, April 7, 2009.
101. Mary Lou Smith Permit, June 11, 2007.
102. Memorandum from John Vandermolen to Architectural Review Committee, May 17, 2007.
103. Memorandum from Janet Jones to TJ Miller, May 8, 2007.
104. Email Correspondence from Mary Lou McNulty to Janet Jones, January 5, 2006.
105. Email Correspondence from Mary Lou McNulty to Janet Jones, April 6, 2006.
106. Trailer Estates Procedures for VHS Tapes, February 27, 2007.
107. John Vandermolen letter to Toni Gaeta, May 21, 2007.
108. Email Correspondence from Martha Brauer to TJ Miller, March 21, 2009.
109. Email Correspondence from Martha Brauer to John Vandermolen, November 19, 2007.
110. Memorandum from Janet Jones to Martha Brauer, December 18, 2007.
111. Memorandum from Toni Gaeta to Janet Jones, December 18, 2007.
112. Letter from Janet Jones to John Vandermolen and Toni Gaeta, December 19, 2007.
113. Trailer Estates Video Computer Club Request Form, May 11, 2009.
114. Email Correspondence from Gail Opper, February 15, 2008.
115. Trailer Estates Response to Public Records Request, April 30, 2009.
116. Memorandum from Joseph Salerno to Trustees, February 27, 2008.
117. Letter from Mary Lou McNulty, August 22, 2006.
118. Letter from Kirk Pinkerton, March 25, 2009.

119. Notes from Office Personnel, March 18, 2008.
120. Letter from Sharon Denson, April 11, 2008.
121. Letter from Sharon Denson, April 17, 2008.
122. Letter from Sharon Denson, May 2, 2008.
123. Letter from Gail Opper to Kirk Pinkerton, April 30, 2008.
124. Letter from Sharon Denson, November 24, 2008.
125. Letter from Mary Lou Smith, August 11, 2006.
126. Letter from Mary Lou Smith, August 26, 2006.
127. District Letter to Mary Lou Smith, December 5, 2007.
128. Letter from Mary Lou Smith, April 17, 2006.
129. Ruden McClosky, P.A., Opinion, May 18, 2006.
130. Letter from Mary Lou McNulty, May 19, 2006.
131. Letter to Mary Lou McNulty, May 23, 2006.
132. Letter to Mary Lou McNulty, July 22, 2006.
133. Letter from Mary Lou McNulty, July 3, 2006.
134. Letter from Mary Lou McNulty, August 22, 2006.
135. Letter from Lewis, Longman & Walker, P.A., May 17, 2007.
136. Trailer Estates Park and Recreation District Employees Memorandum.
137. Memorandum from John Vandermolen, March 8, 2008.
138. Memorandum from Janet Jones to First Vice Chair and Second Vice Chair, March 14, 2008.
139. Letter to Trustees from M. Barnebey, November 8, 2006.
140. Letter to Trustees from M. Barnebey, December 4, 2006.

141. Memorandum from Barnebey to Jones, April 3, 2007.
142. Kirk Pinkerton Letter to J. Jones, April 4, 2007.
143. Letter from Scott Rudacille at Kirk Pinkerton, April 6, 2007.
144. Letter from Scott Rudacille to TJ Miller, April 6, 2007.
145. Memorandum from Kirk Pinkerton to TE Board of Trustees, April 9, 2007.
146. Email from Scott Rudacille to TJ Miller, April 23, 2007.
147. Email from D. Latkovich, June 1, 2007.
148. Email from C. Lycans to TJ Miller, July 18, 2007.
149. Memorandum from Kirk Pinkerton, July 20, 2007.
150. Memorandum from Kirk Pinkerton to TJ Miller, August 13, 2007.
151. Letter from Scott Rudacille to B. Dent, August 14, 2007.
152. Memorandum from Kirk Pinkerton to Trustees, August 24, 2007.
153. Memorandum from Scott Rudacille to Trustees, August 24, 2007
154. Memorandum from Kirk Pinkerton, August 27, 2007.
155. Memorandum from Kirk Pinkerton, September 20, 2007.
156. Memorandum from Kirk Pinkerton to Jones/Trustees, October 4, 2007.
157. Memorandum from Scott Rudacille to Janet Jones, October 19, 2007.
158. Memorandum from Scott Rudacille to Janet Jones, October 19, 2007.
159. Memorandum from Scott Rudacille to Janet Jones, October 22, 2007.
160. Memorandum from Scott Rudacille to Trustees, October 22, 2007.
161. Memorandum from Janet Jones to Scott Rudacille, October 24, 2007.
162. Facsimile from Trustees to Scott Rudacille, November 1, 2007.
163. Memorandum from Trustees to Mark Barnebey, November 29, 2007.

164. Memorandum from Jones/Trustees to Barnebey and Rudacille, December 5, 2007.
165. Memorandum from Rudacille and Barnebey to Trustees, January 21, 2008.
166. Letter to Jones from Scott Rudacille, February 28, 2008.
167. Memorandum to Trustees from Barnebey, April 8, 2008.
168. Memorandum from Kirk Pinkerton, May 8, 2008.
169. Email from Barnebey to Pamela Cole, November 24, 2008.
170. Overview of Applicable Laws Relating to the Creation and Operation of the District, Government in the Sunshine, Public Records, and Ethics Laws, January 2009.
171. Letter from T.J. Miller, February 16, 2009.
172. Email from TJ Miller from Barnebey, February 18, 2009.
173. Tribune, November 2004 through Trial Date.
174. Bradenton Herald Article, April 7, 2008.
175. Bradenton Herald Article, April 8, 2008.
176. Bradenton Herald Article, April 16, 2008.
177. Bradenton Herald Article, May 13, 2008.
178. Bradenton Herald Article, October 26, 2008.
179. Bradenton Herald Article, December 2, 2008.
180. Records Management Compliance Statements, 2005-2006.
181. Records Management Compliance Statements, 2006-2007.
182. Records Management Compliance Statements, 2007-2008.
183. Manatee County Easement Encroachment Agreement, October 12, 2006.
184. Transcript of Executive Session/Shade Meeting, January 5, 2009.
185. Policy and Procedure (PP) 5, May 25, 1993 Amended June 1, 2009.

186. Policy and Procedure (PP) 17, August 16, 2007.
187. Policy and Procedure (PP) 24.
188. Policy and Procedure (PP) 47.
189. Policy and Procedure (PP) 53, Adopted November 17, 2008.
190. Policy and Procedure (PP) 23, January 17, 2008, January 19, 2009.
191. Policy and Procedure (PP) 40, Revised November 17, 2008, and January 19, 2009.
192. Trailer Estates Park and Recreation District By Laws.
193. Video Computer Club By Laws.
194. 2006 Audit of Trailer Estates Park and Recreation District.
195. Recordings of December 11, 2006.
196. Recordings of December 18, 2006.
197. Recordings of December 27, 2006.
198. Recordings of January 15, 2007.
199. Recordings of January 22, 2007.
200. Recordings of February 5, 2007.
201. Recordings of February 12, 2007.
202. Recordings of February 19, 2007.
203. Recordings of February 26, 2007.
204. Recordings of March 5, 2007.
205. Recordings of March 12, 2007.
206. Recordings of March 19, 2007.
207. Recordings of April 2, 2007.
208. Recordings of April 9, 2007.

209. Recordings of April 16, 2007.
210. Recordings of May 7, 2007.
211. Recordings of August 6, 2007.
212. Recordings of October 1, 2007.
213. Recordings of October 8, 2007.
214. Recordings of October 15, 2007.
215. Recordings of October 22, 2007.
216. Recordings of November 5, 2007.
217. Recordings of November 12, 2007.
218. Recordings of November 15, 2007.
219. Recordings of November 19, 2007.
220. Recordings of December 3, 2007.
221. Recordings of December 17, 2007.
222. Recordings of January 2, 2008.
223. Recordings of January 7, 2008.
224. Recordings of January 14, 2008.
225. Recordings of January 21, 2008.
226. Recordings of January 28, 2008.
227. Recordings of February 4, 2008.
228. Recordings of February 11, 2008.
229. Recordings of February 18, 2008.
230. Recordings of February 25, 2008.
231. Recordings of March 3, 2009.

232. Recordings of March 10, 2008.
233. Recordings of March 17, 2008.
234. Recordings of March 24, 2008.
235. Recordings of April 7, 2008.
236. Recordings of April 14, 2008.
237. Recordings of April 21, 2008.
238. Recordings of October 6, 2008.
239. Recordings of October 20, 2008.
240. Recordings of November 3, 2008.
241. Recordings of November 10, 2008.
242. Recordings of November 17, 2008.
243. Recordings of December 1, 2008.
244. Recordings of December 8, 2008.
245. Recordings of December 15, 2008.
246. Recordings of January 2, 2009.
247. Recordings of January 5, 2009.
248. Recordings of January 12, 2009.
249. Recordings of January 19, 2009.
250. Recordings of January 26, 2009.
251. Recordings of February 2, 2009.
252. Recordings of February 9, 2009.
253. Recordings of February 16, 2009.
254. Recordings of February 23, 2009.

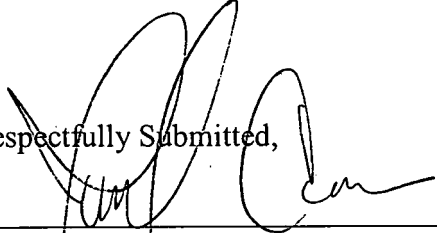
255. Recordings of March 2, 2009.
256. Recordings of March 9, 2009.
257. Recordings of March 16, 2009.
258. Recordings of March 23, 2009.
259. Recordings of April 6, 2009.
260. Recordings of April 13, 2009.
261. Recordings of April 20, 2009.
262. Recordings of April 27, 2009.
263. Recordings of May 4, 2009.
264. Recordings of May 18, 2009.
265. Recordings of May 21, 2009.
266. Recordings of May 28, 2009.
267. Recordings of Board Meetings and Workshops produced by District.
268. Recordings of Board Meetings and Workshops produced by Video Computer Club.
269. Recordings of Board Meetings and Workshops produced by Chester Force.
270. Expected additional exhibits, any and all future Board Meeting and Workshop Meeting Minutes until September 8, 2009, or the beginning of trial.
271. Deposition Exhibits.
272. Demonstrative Exhibits.
273. Exhibits in response to discovery.
274. All documents listed by any Defendant.
275. Public Records Request from Lewis, Longman & Walker, P.A., July 26, 2007.

276. Composite Exhibit: All documents produced by District responsive to July 26, 2007, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000246.
277. Composite Exhibit: All documents produced by District responsive to July 26, 2007, Lewis, Longman & Walker, P.A., Request, Bates Number 000247 through 000466.
278. Public Records Request from Lewis, Longman & Walker, P.A., December 12, 2008.
279. Composite Exhibit: Documents produced by District responsive to December 12, 2008, Lewis, Longman & Walker, P.M., Public Records Request, Bates Number 000001 through 000187, Received January 9, 2009.
280. Composite Exhibit: All supplemental documents produced by District responsive to December 12, 2008, Lewis, Longman & Walker, P.A., Public Records Request, Bates Number 000188 through 000890, Received March 27, 2009.
281. Composite Exhibit: All Supplemental documents produced by District responsive to December 12, 2008, Lewis, Longman & Walker, P.A., Public Records Request, Bates Number 000891 through 000979, Received March 31, 2009.
282. Public Records Request from Lewis, Longman & Walker, P.A., January 8, 2009.
283. Composite Exhibit: All documents produced by District responsive to January 8, 2009, Lewis, Longman & Walker, P.A., Public Records Request, Bates Number 000001 through 000079, Received January 22, 2009.
284. Public Records Request from Lewis, Longman & Walker, P.A., January 12, 2009.
285. Composite Exhibit: All documents produced by District responsive to January 12, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000450, Received January 27, 2009.
286. Public Records Request from Lewis, Longman & Walker, P.A., March 12, 2009.

287. Composite Exhibit: All documents produced by District responsive to March 12, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000087, Received March 26, 2009.
288. Composite Exhibit: All documents produced by District responsive to March 12, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000067, Received, May 6, 2009.
289. Public Records Request from Lewis, Longman & Walker, P.A., April 30, 2009.
290. Composite Exhibit: All documents produced by District responsive to April 30, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000168, Received, May 11, 2009.
291. Public Records Request from Lewis, Longman & Walker, P.A., May 29, 2009.
292. Composite Exhibit: All documents produced by District responsive to May 29, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000073, Received, June 4, 2009.
293. Composite Exhibit: All supplemental documents produced by District responsive to May 29, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000074 through 000093, Received, June 10, 2009.
294. Composite Exhibit: All supplemental documents produced by District responsive to May 29, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000094 through 000342, Received, June 12, 2009.

295. Composite Exhibit: All documents produced by District responsive to May 29, 2009,
Lewis, Longman & Walker, P.A., Request, Received, July 23, 2009.

Respectfully Submitted,



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 3rd 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, **Daniel E. Scott, Esquire**, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, FL 34237, **Thomas D. Shults, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *U.S. Facsimile*, this 27th day of July, 2009.



Jennifer R. Cowan, Esquire