

IN THE TWELFTH JUDICIAL CIRCUIT COURT
IN AND FOR MANATEE COUNTY, FLORIDA

MARY LOU SMITH, et. al.,

Plaintiffs,

v.

Case No.: 2008-CA-11315

TRAILER ESTATES PARK AND
RECREATION DISTRICT, et. al.,

Defendants

**DEFENDANT JANET JONES REQUEST FOR ADMISSION DIRECTED TO EACH
PLAINTIFF, MARY LOU SMITH AND SHARON DENSON AND
MS. JONES' MOTION TO SHORTEN RESPONSE TIME**

Defendant Janet Jones, by and through her undersigned attorney, pursuant to Florida Rule of Civil Procedure 1.370 and 1.380(c), requests each of the Plaintiffs, Mary Lou Smith and Sharon Dense, to admit the truth of each of the statements set forth below.

Defendant Janet Jones moves that the Court shorten the time period within which to respond to these requests for admission, to no later than August 28, 2009.

1. Admit that the Trailer Estates Park and Recreation District Board of Trustees (hereinafter referred to as the "Board of Trustees") serve as department heads who are responsible for day-to-day operations of Trailer Estates.
2. Admit the Board of Trustees' responsibilities for day-to-day operations are administrative and operational matters for which a vote or other formal action by the Board of Trustees is neither required nor contemplated in the future.
3. Admit that the topic of discussion reflected in the minutes of the Executive Board Meeting on June 16, 2006 was subsequently discussed in the meeting of the Board of Trustees on June 19, 2006. Copies of the minutes from the Executive Board Meeting and meeting of the Board of Trustees are attached hereto as Composite Exhibit 1.

4. Admit that the meeting of the Board of Trustees on June 19, 2006 was properly noticed and open to the public.

5. Admit that discussing the topic reflected in the minutes of the Executive Board Meeting on June 16, 2006 at the meeting of the Board of Trustees on June 19, 2006 cured any alleged violation of the Government in the Sunshine Laws, Chapter 119 and 286, *Florida Statutes* (hereinafter referred to as a "Sunshine violation").

6. Admit that the fence case reflected in the minutes of the Executive Board Meeting on July 27, 2006 was subsequently discussed at the meeting of the Board of Trustees on August 7, 2006. Copies of the minutes from the Executive Board Meeting and meeting of the Board of Trustees are attached hereto as Composite Exhibit 2.

7. Admit that the meeting of the Board of Trustees on August 7, 2006 was properly noticed and open to the public.

8. Admit that discussing the fence case reflected in the minutes of the Executive Board Meeting on July 27, 2006 at the meeting of the Board of Trustees on August 7, 2006 cured any alleged Sunshine violation.

9. Admit that the topic of discussion concerning the appointment of Thomas Featheringill to the Board of Trustees reflected in the minutes of the Executive Board Meeting on September 5, 2006 was subsequently discussed in the meeting of the Board of Trustees on September 5, 2006. Copies of the minutes from the Executive Board Meeting and meeting of the Board of Trustees are attached hereto as Composite Exhibit 3.

10. Admit that the meeting of the Board of Trustees on September 5, 2006 was properly noticed and open to the public.

11. Admit that discussing the topic of discussion reflected in the minutes of the Executive Board Meeting on September 5, 2006 at the meeting of the Board of Trustees on September 5, 2006 cured any alleged Sunshine violation

12. Admit that the removal of the wireless internet router was discussed at the meeting of the Board of Trustees on April 21, 2008. A copy of the minutes of the meeting of the Board of Trustees on April 21, 2008 is attached hereto as Exhibit 4.

13. Admit that the meeting of the Board of Trustees on April 21, 2008 was properly noticed and open to the public.

14. Admit that the discussion of the removal of the wireless router during the meeting of the Board of Trustees on April 21, 2008 cured any alleged Sunshine violation.

15. Admit that distributing the annual financial statement and itemized budget are administrative and operational matters for which a vote or formal action is neither required nor contemplated.

16. Admit that distributing the annual audit is administrative and operational matters for which a vote or formal action is neither required nor contemplated.

Respectfully submitted,

MATTHEWS, EASTMOORE, HARDY
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by First Class United States Mail this 11th day of August, 2009, to:

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