

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,  
SUPPLEMENTAL LIST OF WITNESSES AND EXHIBITS

CLERK CIRCUIT COURT  
MANATEE CO. FLORIDA

2009 AUG 13 PM 4:07

FILED FOR RECORD  
R.B. SHORE

Defendant, JOHN VANDER MOLEN, files his supplemental 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 21<sup>st</sup> St. West, Bradenton, Florida.
12. Sharon Denson, 1613 Illinois Ave., Manatee, Florida.
13. Mary Lou Smith, 6907 Tarpoon Lane, Manatee, Florida.
14. Scott Rudacille, Kirk Pinkerton, P.A., 1301 6<sup>th</sup> Ave., Suite 401, Bradenton, Florida 34205.
15. Jason T. Gaskill, Esquire, Ruden McClosky, et al., 1515 Ringling Ave., Suite 700, Sarasota, Florida 34236.
16. Beverly Lew, 2008 Illinois Ave., Bradenton, Florida 34207.
17. Gail Opper, 1915 Minnesota Ave., Bradenton, Florida.
18. Judy Riedel, 2315 New York Ave., Bradenton, Florida 34207.
19. Pamela Cole, Trailer Estates.
20. Bruce Smith, Trailer Estates.
21. Thomas Featheringill, Trailer Estates.
22. Joe Fulmer, Trailer Estates.
23. Peggy Durham, Trailer Estates.
24. Margo Cushman, Trailer Estates.
25. Harry Fitzpatrick, Trailer Estates.

26. Fred Hoch, Trailer Estates.
27. Mike Neal, Trailer Estates.
28. Chet Force, Trailer Estates.
29. Connie Zack, Trailer Estates.
30. Joe Bigley, Trailer Estates.
31. Robert Poor, Trailer Estates.
32. Jane Laduc, Trailer Estates.
33. Carol Welsh, Trailer Estates.
34. Flo Mallory, Trailer Estates.
35. John White, Trailer Estates.
36. Jim Angerame, Trailer Estates.
37. Ruth Sneider, Trailer Estates.
38. Lucille Donovan, Trailer Estates.
39. Chet Bailey, Trailer Estates.
40. Mary Huston, Trailer Estates.
41. Bob Gentner, Trailer Estates.
42. Lary Sarhatt, Trailer Estates.
43. Phyllis Hamblen, Trailer Estates.
44. Lenora Neal, Trailer Estates.
45. Darlene Beasley, Trailer Estates.
46. Catherine Farrell, Trailer Estates.
47. Lonny Stanley, Trailer Estates.
48. Virgil Reinig, Trailer Estates.
49. Nancy Keegan, Trailer Estates.
50. Pat Prosser, Trailer Estates.
51. Chet Force, Trailer Estates.

52. Ruth Langton, Trailer Estates.
53. Emma Tuttle, Trailer Estates.
54. Dorothy Naugle, Trailer Estates.
55. Walter Dietz, Trailer Estates.
56. Esther Callahan, Trailer Estates.
57. Kay Hislop, Trailer Estates.
58. Mike Garrette, Trailer Estates.
59. Jean Cotter, Trailer Estates.
60. Edward Barber, Sunshine Law and Public Record Law Violations, 6730 Marina Dr., Bradenton, Florida 34207.
61. Robert (Bob) Baugh, Sunshine Law and Public Record Law Violations, 1909 Illinois Ave., Bradenton, Florida 34207.
62. Chuck Eldridge, Sunshine Law and Public Record Law Violations, 982 Kingsport Ave., New Port Richey, Florida 34655.
63. Chester Force, Sunshine Law and Public Record Law Violations, 6808 Marina Dr., Bradenton, Florida 34207.
64. Toni Gaeta, Sunshine Law and Public Record Law Violations, 6618 Marina Dr., Bradenton, Florida 34207.
65. Kenneth Meierjorgen, Sunshine Law and Public Record Law Violations, 6521 Connecticut Ave., Bradenton, Florida 34207.
66. Thelma Jo (T.J.) Miller, Sunshine Law and Public Record Law Violations, 2314 New York Ave., Bradenton, Florida 34207.
67. Richard Ott, Sunshine Law and Public Record Law Violations, 30165 South East Judd Rd., Eagle Creek, Oregon 97022.
68. Records Custodian of Trailer Estates Park and Recreational District, c/o Thomas D. Shults, Esquire, 50 Central Ave., Suite 700, Sarasota, Florida 34236
69. Records Custodian of Video Computer Club Trailer Estates Park and Recreational District, c/o Thomas D.

- Shults, Esquire, 50 Central Ave., Suite 700, Sarasota, Florida 34236.
70. Records Custodian of Kirk Pinkerton, P.A., c/o Thomas D. Shults, Esquire, 50 Central Ave., Suite 700, Sarasota, Florida 34236.
  71. Representative of Trailer Estates Park and Recreational District, c/o Thomas D. Shults, Esquire, 50 Central Ave., Suite 700, Sarasota, Florida 34236.
  72. Bruce Smith, Sunshine Law and Public Record Law Violations, 2316 New York Ave., Bradenton, Florida 34207.
  73. Harry Splett, Sunshine Law and Public Record Law Violations, 2401 Ohio Ave., Bradenton, Florida 34207.
  74. Morgan Swearngen, Sunshine Law and Public Record Law Violations, 2116 Ohio Ave., Bradenton, Florida 34207.
  75. John White, Sunshine Law and Public Record Law Violations, 2209 Indiana Ave., Bradenton, Florida 34207.
  76. Mark Yawber, c/o Thomas D. Shults, Esquire, 50 Central Ave., Suite 700, Sarasota, Florida 34236.
  77. Computer Forensic Expert, Expert Witness, c/o Lewis, Longman & Walker, P.A., 1001 3<sup>rd</sup> Ave., West, Suite 670, Bradenton, Florida 34205.
  78. Rebuttal Witnesses.
  79. All witnesses necessary for impeachment or rebuttal.
  80. Any person deposed in this lawsuit.
  81. Any and all witnesses identified by either plaintiffs or any of the defendants.
  82. All witnesses that may become known through the course of further discovery.
  83. Any and All witnesses whose names appear in answers to interrogatories, depositions and other discovery on file in this case.
  84. 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.
22. VHS cassette tapes of Trailer Estates Park and Recreational District Committee meetings.
23. Any and all audio cassette tapes of Trailer Estates Park and Recreational District Committee meetings.
24. Database of Trailer Estates Park and Recreational District.
25. DVD of February 20, 2006 Regular Board of Trustees meeting.
26. Policy and Procedure (PP) 5, May 25, 1993 Amended June 1, 2009.
27. Policy and Procedure (PP) 17, August 16, 2007.
28. Policy and Procedure (PP) 24.
29. Policy and Procedure (PP) 47.
30. Policy and Procedure (PP) 53, Adopted November 17, 2008.
31. Policy and Procedure (PP) 23, January 17, 2008, January 19, 2009.
32. Policy and Procedure (PP) 40, Revised November 17, 2008, and November 19, 2009.
33. Trailer Estates Park and Recreation District By Laws.
34. Video Computer Club By Laws.
35. 2006 Audit of Trailer Estates Park and Recreational District.
36. Recordings of December 11, 2006.
37. Recordings of December 18, 2006.
38. Recordings of December 27, 2006.
39. Recordings of January 15, 2007.

40. Recordings of January 22, 2007.
41. Recordings of February 5, 2007.
42. Recordings of February 12, 2007.
43. Recordings of February 19, 2007.
44. Recordings of February 26, 2007.
45. Recordings of March 5, 2007.
46. Recordings of March 12, 2007.
47. Recordings of March 19, 2007.
48. Recordings of April 2, 2007.
49. Recordings of April 9, 2007.
50. Recordings of April 16, 2007.
51. Recordings of May 7, 2007.
52. Recordings of August 6, 2007.
53. Recordings of October 8, 2007.
54. Recordings of October 15, 2007.
55. Recordings of October 22, 2007.
56. Recordings of November 5, 2007.
57. Recordings of November 12, 2007.
58. Recordings of November 15, 2007.
59. Recordings of November 19, 2007.
60. Recordings of December 3, 2007.
61. Recordings of December 17, 2007.
62. Recordings of January 2, 2008.
63. Recordings of January 7, 2008.
64. Recordings of January 14, 2008.
65. Recordings of January 21, 2008.
66. Recordings of January 28, 2008.
67. Recordings of February 4, 2008.
68. Recordings of February 11, 2008.
69. Recordings of February 18, 2008.
70. Recordings of February 25, 2008.
71. Recordings of March 3, 2008.
72. Recordings of March 10, 2008.

73. Recordings of March 17, 2008.
74. Recordings of March 24, 2008.
75. Recordings of April 7, 2008.
76. Recordings of April 14, 2008.
77. Recordings of April 21, 2008.
78. Recordings of October 6, 2008.
79. Recordings of October 20, 2008.
80. Recordings of November 3, 2008.
81. Recordings of November 10, 2008.
82. Recordings of November 17, 2008.
83. Recordings of December 1, 2008.
84. Recordings of December 8, 2008.
85. Recordings of December 15, 2008.
86. Recordings of January 2, 2009.
87. Recordings of January 5, 2009.
88. Recordings of January 12, 2009.
89. Recordings of January 19, 2009.
90. Recordings of January 26, 2009.
91. Recordings of February 2, 2009.
92. Recordings of February 9, 2009.
93. Recordings of February 16, 2009.
94. Recordings of February 23, 2009.
95. Recordings of March 2, 2009.
96. Recordings of March 9, 2009.
97. Recordings of March 16, 2009.
98. Recordings of March 23, 2009.
99. Recordings of April 6, 2009.
100. Recordings of April 13, 2009.
101. Recordings of April 20, 2009.
102. Recordings of April 27, 2009.
103. Recordings of May 4, 2009.
104. Recordings of May 18, 2009.
105. Recordings of May 21, 2009.

106. Recordings of May 28, 2009. Recordings of Board Meetings and Workshops produced by District.
107. Recordings of Board Meetings and Workshops produced by Video Computer Club.
108. Records of Board Meetings and Workshops produced by Chester Force.
109. Demonstrative Exhibits.
110. Public Records Request from Lewis, Longman & Walker, P.A., July 26, 2007.
111. Composite Exhibit: All documents produced by District responsive to July 26, 2007, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000246.
112. Composite Exhibit: All documents produced by District responsive to July 26, 2007, Lewis, Longman & Walker, P.A., Request, Bates Number 000347 through 000466.
113. Public Records Request from Lewis, Longman & Walker, P.A., December 12, 2008.
114. Composite Exhibit: All documents produced by District responsive to December 12, 2008, Lewis, Longman & Walker, P.A., Request, Bates Number 000001 through 000187, Received January 9, 2009.
115. Composite Exhibit: All documents produced by District responsive to December 12, 2008, Lewis, Longman & Walker, P.A., Request, Bates Number 000188 through 000890, Received March 27, 2009.
116. 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.
117. Public Records Request from Lewis, Longman & Walker, P.A., January 8, 2009.
118. Composite Exhibit: All documents produced by District responsive to January 8, 2009, Lewis, Longman & Walker,

- P.A., Request, Bates Number 000001 through 000079,  
Received January 22, 2009.
119. Public Records Request from Lewis, Longman & Walker,  
P.A., January 12, 2009.
  120. Composite Exhibit: All documents produces by District  
responsive to January 12, 2009, Lewis, Longman &  
Walker, P.A., Request, Bates Number 000001 through  
000450, Received January 27, 2009.
  121. Public Records Request from Lewis, Longman & Walker,  
P.A., March 12, 2009.
  122. Composite Exhibit: All documents produces by District  
responsive to March 12, 2009, Lewis, Longman & Walker,  
P.A., Request, Bates Number 000001 through 000087,  
Received March 26, 2009.
  123. Composite Exhibit: All documents produces by District  
responsive to March 12, 2009, Lewis, Longman & Walker,  
P.A., Request, Bates Number 000001 through 000067,  
Received May 6, 2009.
  124. Public Records Request from Lewis, Longman & Walker,  
P.A., April 30, 2009.
  125. Composite Exhibit: All documents produces by District  
responsive to April 30, 2009, Lewis, Longman & Walker,  
P.A., Request, Bates Number 000001 through 000168,  
Received May 11, 2009.
  126. Public Records Request from Lewis, Longman & Walker,  
P.A., May 29, 2009.
  127. Composite Exhibit: All documents produces by District  
responsive to May 29, 2009, Lewis, Longman & Walker,  
P.A., Request, Bates Number 000001 through 000073,  
Received June 4, 2009.
  128. Composite Exhibit: All documents produces by District  
responsive to May 29, 2009, Lewis, Longman & Walker,

P.A., Request, Bates Number 000001 through 000073,  
Received June 10, 2009.

129. 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.
130. Composite Exhibit: All Supplemental documents produced by District responsive to May 29, 2009, Lewis, Longman & Walker, P.A., Request, Bates Number 000094 through 0000342, Received June 12, 2009.
131. Composite Exhibit: All documents produces by District responsive to May 29, 2009, Lewis, Longman & Walker, P.A., Request, Received June 23, 2009.

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 August // , 2009.

DANIEL E. SCOTT, P.A.



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