

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

MARY LOU SMITH, et. al.,

Plaintiff,

vs.

Case No. 2008-CA-11315

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

Defendants.

NOTICE OF POTENTIAL UNAVAILABILITY

Counsel for Defendant Janet Jones gives notice to the Court and other counsel that:

1. On August 26, 2009 he received a subpoena in the matter of Anthony Lorenzo, et. al. v. City of Venice, et. al. ("City of Venice"), Case Number 2008-CA-008108-SC, to appear and testify before Judge Bennett during the two-day period, Monday and Tuesday, September 14 and 15, 2009. Undersigned counsel served as attorney for John Moore, who was previously a defendant in that case. A copy of the subpoena is attached as Exhibit A.
2. Undersigned counsel has moved for a protective order in the City of Venice case, citing the trial in this case, however, that motion has not yet been heard.
3. Undersigned counsel may need to request relief and postpone the Trailer Estates case should Judge Bennett not grant the Motion for Protective Order in the City of Venice case.
4. Undersigned counsel will advise the Court as this matter progresses.

Respectfully submitted,

/s/ Hunter W. Carroll
Hunter W. Carroll, FL Bar No. 0297630
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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 27th day of August, 2009, to:

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/s/ Hunter W. Carroll

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA

ANTHONY LORENZO, et al.,

Plaintiffs,

v.

CASE NO.: 2008 CA 8108 SC

CITY OF VENICE,

Defendant.

SUBPOENA DUCES TECUM

THE STATE OF FLORIDA:

TO: HUNTER CARROLL
1777 Main St Ste 500
Sarasota, Florida 34236-5841

YOU ARE HEREBY COMMANDED to appear on the date and time below, before the Honorable JUDGE BENNETT, Judge of said Court, at 4000 Tamiami Trail, Venice, FL 34285, Courtroom J, to testify in the above-styled cause and to have with you at that time and place the following:

1. All invoices and billing statements submitted for payment or reimbursement of legal fees and costs in connection with that matter styled Lorenzo v. City of Venice, Case No. 2008 CA 8108 SC;

If you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the following attorneys and unless otherwise excused from this subpoena by these attorneys or the Court, you shall respond to this subpoena as directed and remain until excused.

DATE AND TIME: MONDAY, SEPTEMBER 14, 2009, and TUESDAY, SEPTEMBER 15, 2009 at 9:00 a.m., AS REQUIRED BY THE COURT.

Dated on this 25th day of AUGUST, 2009.

ANDREA FLYNN MOGENSEN, ESQ.
ATTORNEY OF RECORD
FOR THE COURT



Attorney for Plaintiffs
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