

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

SHARON DENSON'S RESPONSE TO DEFENDANT, JANET JONES'
REQUEST FOR ADMISSIONS

Plaintiff, SHARON DENSON, by and through her undersigned Counsel and pursuant to Rule 1.370, *Florida Rules of Civil Procedure*, hereby responds to Defendant, JANET JONES' Request for Admissions and states as follows:

1. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

2. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

3. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

4. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the

Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

5. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

6. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

7. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on

the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

8. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

9. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

10. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be

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11. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

12. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

13. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner.

Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

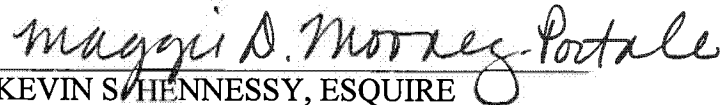
14. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

15. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this Request for Admission was not propounded by the Defendant, Janet Jones, in a timely manner. Paragraph 4 of the Court's Order Scheduling Case for Non-Jury Trial requires that all discovery be completed by August 29, 2009. The Defendant, Janet Jones, served this Request for Admission on the Plaintiff by mail on August 11, 2009 (the Requests were received on August 12, 2009), and the Plaintiff's response to this discovery is due beyond the discovery cut off deadline. The Plaintiff is entitled to the full 30 days to prepare her response to discovery.

16. Without waiving all other substantive objections, the Plaintiff, Sharon Denson, objects to this Request for Admission pursuant to Rule 1.370(a), Fla. R. Civ. Pro., because this

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Respectfully Submitted,



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE D. MOONEY-PORTALE, ESQUIRE
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Bradenton, Florida 34205
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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 *Facsimile*, this 28th day of August, 2009.


MAGGIE D. MOONEY-PORTALE, ESQUIRE