

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

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.

SUBPOENA DUCES TECUM FOR TRIAL

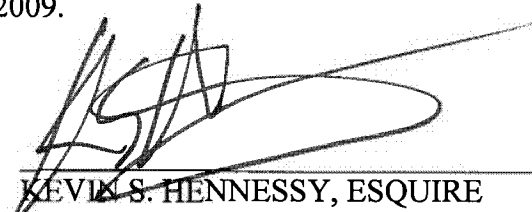
TO: THELMA JO MILLER
2314 NEW YORK AVENUE
BRADENTON, FL 34207

YOU ARE COMMANDED to appear before the **Honorable Janette Dunnigan**, judge of the Circuit Court, at the Manatee County Judicial Center, 1051 Manatee Avenue West, Bradenton, Florida, in courtroom 6E, for a two-week trial docket beginning **September 8, 2009 at 9:00 a.m.** and ending September 18, 2009. Please bring with you the items on attached Exhibit A. If you fail to appear, you may be in contempt of court.

YOU ARE SUBPOENAED to appear by the following attorneys, and unless excused from this subpoena by these attorneys or the court, you shall respond to this subpoena as

directed. You may call the office of the attorney listed below on September 4, 2009 to confirm the exact time that you will be called to testify.

Dated this 1st day of September, 2009.



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE D. MOONEY-PORTALE, ESQUIRE
Florida Bar No. 0555924
JENNIFER R. COWAN
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Attorneys for Plaintiffs

Exhibit "A"

- 1) The Trailer Estates Park and Recreation District's (the District) most recent edition of the Government-in-the-Sunshine Manual.
- 2) The District's public records manual.
- 3) The District's public records logs for year 2005 to present.
- 4) Any and all records requested, but never produced.
- 5) Copy of the March 20, 2006 letter from Bill Secraw to the Board of Trustees (the "Board") regarding the budget.
- 6) The September 26, 2006 memo from the Manatee County Attorneys' Office to Commissioner Ron Getman regarding the District.
- 6) Minutes from the October 23, 2006 special meeting of the Board.
- 7) A copy of the videotape and/or audio recording of the June 19, 2006 board meeting.
- 8) A copy of the citation letter of March 2005 issued by the District to Daniel Smith alleging violations at 6603 Arizona Avenue, Bradenton Florida 34207.
- 9) A copy of the videotape of the 2006 budget meeting.
- 10) A complete and current copy of the District's database.
- 11) Copies of emails between the Trustees and Trustee-elects from January 1, 2006 to December 12, 2008 not previously produced.
- 12) Copies of the Tribune for August 2006 and August 2008.
- 13) A copy of the unredacted version of the October 9, 2007 email to John Vander Molen re: absentee ballot requests.
- 14) A copy of the unredacted version of the September 16, 2006 email from Bernie Dent regarding rental increases.