

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.

DEFENDANT'S 10-29-09 REQUEST FOR PRODUCTION TO PLAINTIFFS

Defendant JANET JONES in accordance with Rules 1.280 and 1.350, Florida Rules of Civil Procedure, requests Plaintiffs MARY LOU SMITH and SHARON DENSON to produce for inspection and copying each of the following specified items to the fullest extent permitted by those rules that are within the possession, custody or control of such plaintiffs. Production is to occur at the offices of Matthews, Eastmoore, Hardy, Crauwels & Garcia, 1777 Main Street, Suite 500, Sarasota, Florida 34236, within thirty (30) days from the date service of this request.

Service of copies by mail to the above address will be deemed compliance; however, Defendant Jones reserves the right to inspect the original items produced.

Undersigned counsel agrees to pay reasonable copying charges up to \$50. Should the copying cost exceed \$50, please contact undersigned prior to making copies.

Moreover, please note that you do NOT need to re-produce any document that you produced as Trial Exhibits 1-220 as well.

SPECIFICATION OF DOCUMENTS

1. Please produce the ARC permit referenced in allegation 37(z) of the Third Amended Complaint.
2. Please produce Complaint 216 referenced in allegation 37(dd) of the Third Amended Complaint.
3. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(h) of the Third Amended Complaint.
4. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(s) of the Third Amended Complaint.
5. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(t) of the Third Amended Complaint.
6. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(u) of the Third Amended Complaint.
7. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(v) of the Third Amended Complaint.
8. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(w) of the Third Amended Complaint.
9. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(x) of the Third Amended Complaint.
10. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(y) of the Third Amended Complaint.
11. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(z) of the Third Amended Complaint.

12. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(aa) of the Third Amended Complaint.

13. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(bb) of the Third Amended Complaint.

14. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(cc) of the Third Amended Complaint.

15. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(dd) of the Third Amended Complaint.

16. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(ee) of the Third Amended Complaint.

17. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(jj) of the Third Amended Complaint.

18. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(ll) of the Third Amended Complaint.

19. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(rr) of the Third Amended Complaint.

20. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(ss) of the Third Amended Complaint.

21. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(tt) of the Third Amended Complaint.

22. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(vv) of the Third Amended Complaint.

23. Please produce all documents that form any part of the factual basis for your

allegations in paragraph 37(zz) of the Third Amended Complaint.

24. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(aaa) of the Third Amended Complaint.

25. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(bbb) of the Third Amended Complaint.

26. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(ccc) of the Third Amended Complaint.

27. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(eee) of the Third Amended Complaint.

28. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(nnn) of the Third Amended Complaint.

29. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(ppp) of the Third Amended Complaint.

30. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(rrr) of the Third Amended Complaint.

31. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(sss) of the Third Amended Complaint.

32. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(vvv) of the Third Amended Complaint.

33. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(yyy) of the Third Amended Complaint.

34. Please produce all documents that form any part of the factual basis for your allegations in paragraph 37(zzz) of the Third Amended Complaint.

Matthews, Eastmoore, Hardy,
Crauwels & Garcia, P.A.
1777 Main Street, 5th Floor
Sarasota, FL 34236
941-366-8888
941-954-7777 Facsimile

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail and First Class United States Mail this 29th day of October, 2009, to:

James D. Dye, Esquire
Dye, Deitrich, Ptruff & St. Paul, P.L.
1111 Third Avenue West, Suite 300
Bradenton, FL 34205
jdye@dye-firm.com
Attorney for Defendant, Mary Lou McNulty

Kevin S. Hennessy, Esquire
Lewis, Longman, Walker, P.A.
1001 Third Avenue West., Suite 670
Bradenton, FL 34205
Khennessy@llw-law.com
*Attorney for Plaintiffs, Mary Lou Smith,
and Sharon Denson*

Robert E. Turffs, Esquire
Robert E. Turffs, P.A.
1444 First Street, Suite B
Sarasota, FL 34236
turffs@aol.com
Attorney for Defendant, Joseph Salerno

Daniel E. Scott, Esquire
Daniel E. Scott, P.A.
2033 Main Street, Suite 408
Sarasota, FL 34237
danscott.atty@gte.net
*Attorney for Defendant,
John Vander Molen*

Thomas D. Shults, Esquire
Kirk, Pinkerton, P.A.
50 Central Avenue, Suite 700
Sarasota, FL 34236
tshults@kirkpinkerton.com
*Attorney for Defendant, Trailer Estates Park
and Recreation District*

/s/ Hunter W. Carroll