

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

MARY LOU SMITH, an individual,  
and SHARON DENSON, an individual,

Plaintiffs,

v.

CASE NO. 08 CA 11315

TRAILER ESTATES PARK AND  
RECREATION DISTRICT,  
an independent special taxing district,  
JANET JONES, an individual,  
JOHN VANDER MOLEN, an individual,  
JOSEPH SALERNO, an individual, and  
MARY LOU McNULTY, an individual,

Defendants.

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**TRAILER ESTATES' OBJECTION TO PLAINTIFFS'  
THIRD REQUEST FOR PRODUCTION AND REQUEST FOR INSPECTION**

COMES NOW the Defendant, Trailer Estates Park and Recreation District (hereinafter referred to as "District") by and through its undersigned counsel and pursuant to Florida Civil Procedure and hereby files this Objection to the above-referenced discovery requests dated December 31, 2009 and as grounds thereof states:

1. Plaintiffs have failed to establish an adequate predicate for the inspection of the computers and devices referenced in their discovery requests.
2. The Plaintiffs have propounded the above-referenced discovery requests in bad faith and solely for the purpose of annoyance. The Plaintiffs have made over 50 Public Records Requests and Requests for Production to the District and the District has responded to each request in a timely fashion. Given the history of the Plaintiffs' conduct in this matter, it is apparent that the discovery requests are nothing more than a fishing expedition calculated to harass and annoy the District.

WHEREFORE the District respectfully requests this Honorable Court to sustain the Objection stated herein.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S. Mail to Kevin S. Hennessy, Esquire, Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205, Daniel E. Scott, Esquire, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, FL 34237, Robert E. Turffs, P.A. 1444 First Street, Suite B, Sarasota, Florida 34236, James D. Dye, Esquire, Dye Deitrich, Petruff & St. Paul, P.L., 1111 3rd Avenue W., Bradenton, FL 34205-7834, and Hunter W. Carroll, Esquire, Matthews, Eastmoore, Hardy, Crauwels & Garcia, P.A., 1777 Main Street, Suite 500, Sarasota, FL 34236, on this 7 day of January, 2010.

**KIRK ■ PINKERTON, P.A.**  
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By: 

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