

**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.

**NOTICE OF FILING DOCUMENTS IN SUPPORT
OF PLAINTIFFS' MOTION TO COMPEL AND MOTION FOR RULING ON
OBJECTIONS TO NON-PARTY SUBPOENAS**

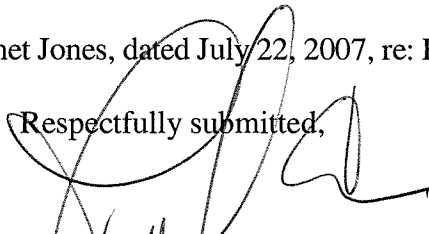
Plaintiffs, MARY LOU SMITH and SHARON DENSON, by and through their undersigned counsel, file the following documents in support of Plaintiffs' Motion to Compel and Motion for Ruling on Objections to Non-Party Subpoenas, and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida Law.

1. Plaintiffs' Trail Exhibit # 36.
2. Plaintiffs' Trial Exhibit # 63.
3. Plaintiffs' Trial Exhibit # 70.
4. Plaintiffs' Trail Exhibit # 123.
5. Plaintiffs' Trail Exhibit # 126.
6. Plaintiffs' Trail Exhibit # 211.

7. Plaintiffs' Trail Exhibit # 212.
8. Plaintiffs' Trail Exhibit # 322.
9. Plaintiffs' Trail Exhibit # 325.
10. Plaintiffs' Trail Exhibit # 329.
11. Plaintiffs' Trail Exhibit # 331.
12. Plaintiffs' Trail Exhibit # 333.
13. Plaintiffs' Trail Exhibit # 336.
14. Plaintiffs' Trail Exhibit # 338.
15. Plaintiffs' Trail Exhibit # 343.
16. Plaintiffs' Trail Exhibit # 348.
17. Plaintiffs' Trail Exhibit # 350.
18. Plaintiffs' Trail Exhibit # 352.
19. Plaintiffs' Trail Exhibit # 359.
20. Plaintiffs' Trail Exhibit # 364.
21. Plaintiffs' Trail Exhibit # 365.
22. Plaintiffs' Trail Exhibit # 366.
23. Plaintiffs' Trail Exhibit # 410 .
24. Plaintiffs' First Request for Production.
25. Trailer Estates Park and Recreation District Board of Trustee Meeting Minutes, June 16, 2008.
26. Florida Department of State General Schedule for State and Local Government Agencies GS1-SL.
27. Plaintiffs' Public Records Request, dated November 13, 2009.
28. Plaintiffs' Public Records Request, dated January 20, 2010.

29. Letter from Thomas D. Shults, Esquire to Jennifer R. Cowan, Esquire, dated January 27, 2010, with enclosure.
30. Memorandum from TJ Miller to Trustees, dated October 12, 2007.
31. Email from John Vandermolen to chalkbd@tampabay.rr.com, dated May 4, 2006, re: Early Morning Observation.
32. Email from John Vandermolen to Janet Jones, dated July 22, 2007, re: Fence.

Respectfully submitted,



KEVIN S. HENNESSY, ESQUIRE
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MAGGIE D. MOONEY-PORTALE, ESQUIRE
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Counsel for Plaintiffs

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 *U.S. Mail*, this 29th day of January, 2010.



JENNIFER R. COWAN, ESQUIRE