

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

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

Plaintiffs,

vs.

CASE NO.: 2008 CA 11315

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.

PLAINTIFFS' SECOND REQUEST FOR PRODUCTION TO JOHN VANDERMOLEN

Plaintiffs, MARY LOU SMITH and SHARON DENSON, by and through their undersigned counsel and pursuant to Rule 1.350, *Florida Rules of Civil Procedure*, request Defendant Vander Molen produce the following documents at the office of Lewis, Longman & Walker, P.A., 1001 3rd Avenue West, Suite 670, Bradenton, FL 34207, for purposes of review and copying within thirty days after service of this Request for Production:

DEFINITIONS

As used herein, the following words shall have the following meanings indicated:

A. As used herein, the term "document" shall mean any and all written, graphic, audio, electronically and visually recorded matter of every kind and description, however produced, reproduced, or stored, whether draft or final, original, reproduction, or original because of notations, additions, deletions, or other changes rendering a copy not identical, all including but not limited to the definition of the term "writing" in Section 1.01(4), Florida Statutes, and in your actual or constructive possession, custody, or control.

B. "You" or "your" shall refer to JOHN VANDERMOLEN, an individual your successors, or assigns, including all other persons acting or purporting to act on your behalf; experts, persons consulted concerning any factual matter or matters of opinion relating to any of the facts or issues involved in this action, unless privileged.

INSTRUCTIONS

A. If any requested document is not presently within your physical custody, possession or control of your agents or attorneys, but you have the legal right to obtain it, then you are requested to take such steps as may be necessary to procure or produce such at the time and place indicated herein. If any such document is contained in computer memory, magnetic tape or similar non-legible storage, you are requested to produce the computer containing the document for inspection and copying.

B. To the extent precise and complete emails cannot be furnished, such documents as are available shall be supplied.

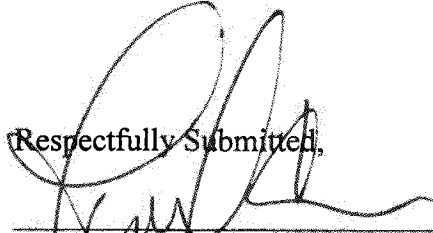
C. If objection is taken to any of the following requests, or if a request is otherwise not answered in full, state the specific grounds therefore, and respond to such request to the extent to which there is no objection. If privilege is alleged as to any of the documents requested, fully identify for each such document:

- (1) Its date;
- (2) The author;
- (3) The recipient; and
- (4) The general subject matter.

DOCUMENTS TO BE PRODUCED

1. Any and all documents identified or referenced in your responses to the Plaintiffs' First Set of Interrogatories.

Respectfully Submitted,



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE MOONEY-PORTALE, ESQUIRE
Florida Bar No. 0555924
JENNIFER R. COWAN, ESQUIRE
Florida Bar No. 038081
Lewis, Longman & Walker, P.A.
1001 3rd Avenue West, Suite 670
Telephone (941) 708-4040
Facsimile (941) 708-4024
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 *facsimile and U.S. Mail*, this 3rd day of February, 2010.



JENNIFER R. COWAN, ESQUIRE