

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.

\_\_\_\_\_ /

**NOTICE OF SERVING DEFENDANT JANET JONES' FIRST SET OF  
INTERROGATORIES TO PLAINTIFF, SHARON DENSON**

Defendant, JANET JONES, by and through her undersigned counsel and pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, gives notice of serving the original and one copy of her Second Set of Interrogatories to Plaintiff, SHARON DENSON, questions 20-29, responses to which are due in 30 days.

Respectfully submitted,

\_\_\_\_\_  
/s/ Hunter W. Carroll

Hunter W. Carroll  
FB No. 0297630  
[hcarroll@matthewseastmoore.com](mailto:hcarroll@matthewseastmoore.com)  
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, facsimile, and First Class United States Mail this 8th day of February, 2010, to:

James D. Dye, Esquire  
Dye, Deitrich, Ptruff & St. Paul, P.L.  
1111 Third Avenue West, Suite 300  
Bradenton, FL 34205  
(941) 748-1573 ~ facsimile  
[jdye@dye-firm.com](mailto: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  
(941) 708-4024 ~ facsimile  
[Khennessy@llw-law.com](mailto: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  
(941) 953-5736 ~ facsimile  
[turffs@aol.com](mailto: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  
(941) 366-6303 ~ facsimile  
[danscott.atty@gte.net](mailto: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  
(941) 364-2490 ~ facsimile  
[tshults@kirkpinkerton.com](mailto:tshults@kirkpinkerton.com)  
*Attorney for Defendant, Trailer Estates Park  
and Recreation District*

\_\_\_\_\_  
/s/ Hunter W. Carroll

**JANET JONES SECOND SET OF INTERROGATORIES TO SHARON DENSON**

20. With respect to allegation 37(y) of the Third Amended Complaint, please identify with specificity each communication concerning “the application of OSHA to Trailer Estates” that Defendant Jones allegedly had with Bruce Smith or John Vander Molen that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such issue(s).

**ANSWER:**

21. With respect to allegation 37(bb) of the Third Amended Complaint, please identify with specificity each “District procedures regarding donations from clubs and funding to the clubs” allegedly discussed by Defendant Jones and Pam Cole that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such issue(s).

**ANSWER:**

22. With respect to allegation 37(ee) of the Third Amended Complaint, please identify with specificity each communication concerning “withdrawal of Vandermolen’s [sic] resignation from ARC” that allegedly discussed by Defendant Jones and John Vander Molen that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such matter.

**ANSWER:**

23. With respect to allegation 37(tt) of the Third Amended Complaint, please identify with specificity each communication at the alleged pre-meeting about “raising the marina and storage lot fees” that Defendant Jones allegedly had with another then-Trustee that you contend is in violation of the Sunshine Law; and as to each such communication, please identify the then-Trustee with whom Defendant Jones communicated and whether and when the Board of Trustees took action on such matters.

**ANSWER:**

24. With respect to allegation 37(aaa) of the Third Amended Complaint, please identify each communication about “the appointment of a SAFE Committee” that Defendant Jones allegedly had with Bruce Smith that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such matter.

**ANSWER:**

25. With respect to allegation 37(qqq) of the Third Amended Complaint, please identify each and every communication concerning the adoption “of page 4 of the Public Records Policy” that Defendant Jones allegedly had with another then-Trustee that you contend is in violation of the Sunshine Law; and as to each communication, please identify the then-Trustee with whom Defendant Jones allegedly communicated and whether and when the Board of Trustees took action on such matters allegedly discussed.

**ANSWER:**

26. With respect to allegation 37(rrr) of the Third Amended Complaint, please identify each and every communication about the decision “to deny the publication of articles authored by Denson in the Tribune” that Defendant Jones allegedly had with another then-Trustee that you contend is in violation of the Sunshine Law; and as to each such communication, please identify the then-Trustee with whom Defendant Jones allegedly communicated and whether and when the Board of Trustees took action on such matter.

**ANSWER:**

27. With respect to allegation 37(sss) of the Third Amended Complaint, please identify with specificity each and every communication concerning “the disaster plan” that Defendant Jones allegedly had with Defendant McNulty, Pam Cole, or Margo Cushman that you contend is in violation of the Sunshine Law; and for each such communication, identify whether and when the Board of Trustees took action on such matter.

**ANSWER:**

28. With respect to allegation 37(vvv) of the Third Amended Complaint, please identify with specificity each and every communication involving “the future planning survey” that Defendant Jones allegedly had with Defendant McNulty that you contend is in violation of the Sunshine Law; and as to each communication, identify whether and when the Future Planning Committee took action to make a recommendation, and whether and when the Board of Trustees took action on such recommendation from the Future Planning Committee.

**ANSWER:**

29. With respect to allegation 37(jjjj) of the Third Amended Complaint, please identify with specificity each and every communication concerning “the appointment of McNulty as second vice chair” that Defendant Jones allegedly had with Defendant McNulty or TJ Miller that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees acted on such matter(s).

**ANSWER:**

\_\_\_\_\_  
Sharon Denson

STATE OF FLORIDA        )

COUNTY OF \_\_\_\_\_ )

BEFORE ME, duly appeared Sharon Denson, who is personally know to me or has produced \_\_\_\_\_ as identification, deposes, swears or affirms and says that the foregoing Answers to Interrogatories are true and correct.

WITNESSED my hand and seal this \_\_\_\_ day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
NOTARY PUBLIC

\_\_\_\_\_  
Printed name of Notary Public

My Commission Expires: