

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

MARY LOU SMITH, et al.,

Plaintiffs,

v.

Case No. 2008-CA-11315

TRAILER ESTATES PARK AND
RECREATION DISTRICT, et al.,

Defendants.

DEFENDANT JONES'S SECOND SUPPLEMENTAL EXHIBIT AND WITNESS LIST

Defendant Janet Jones, files her Second Supplemental Exhibit List identifying exhibits she may introduce as evidence at trial. Defendant Janet Jones reserves the right to supplement this list:

Witnesses

1. Ms. Jones reincorporates here the witnesses she identified in her list with a July 27, 2009 certificate of service date. (Potential witnesses Lou Ursini and Jason Gaskill remains at the same address; however, they are now associated with the firm Adams and Reese, LLP.)
2. Lou Ursini, III, Esquire
Adams and Reese, LLP
1515 Ringling Blvd., Suite 700
Sarasota, FL 34236
3. Jason Gaskill, Esquire
Adams and Reese, LLP
1515 Ringling Blvd., Suite 700
Sarasota, FL 34236

4. Sharon Denson
c/o Lewis, Longman, Walker, P.A.
1001 Third Avenue West, Suite 670
Bradenton, FL 34205
5. Mary Lou Smith
c/o Lewis, Longman, Walker, P.A.
1001 Third Avenue West, Suite 670
Bradenton, FL 34205
6. Pam Cole
2205 Minnesota Avenue
Bradenton, FL 34207
7. Thomas Featheringill
1816 Michigan Avenue
Bradenton, FL 34207
8. Beverly Lew
2008 Illinois Avenue
Bradenton, FL 34207
9. Melanie A. Marken
c/o Lewis, Longman & Walker, P.A.
101 Third Avenue West, Suite 670
Bradenton, FL 34205
10. Maggie Mooney-Portale
Lewis, Longman & Walker, P.A.
101 Third Avenue West, Suite 670
Bradenton, FL 34205
11. Records Custodian
of Trailer Estates Park
and Recreation District
c/o Thomas D. Shults, Esquire
Kirk Pinkerton, P.A.
50 Central Avenue, Suite 700
Sarasota, FL 34236
12. Bruce Smith
2316 New York Avenue
Bradenton, FL 34207

Exhibits

1. Charter
2. By-Laws

All minutes from Board of Trustees meetings including:

3. February 7, 2005 minutes, Board of Trustees.
4. March 21, 2005 minutes, Board of Trustees.
5. March 28, 2005 minutes, Board of Trustees.
6. May 23, 2005 minutes, Board of Trustees.
7. March 6, 2006 minutes, Board of Trustees.
8. June 19, 2006 minutes, Board of Trustees.
9. July 3, 2006 minutes, Board of Trustees.
10. October 16, 2006 minutes, Board of Trustees.
11. October 30, 2006 minutes, Board of Trustees.
12. November 6, 2006 minutes, Board of Trustees.
13. January 15, 2007 minutes, Board of Trustees.
14. February 5, 2007 minutes, Board of Trustees.
15. February 19, 2007 minutes, Board of Trustees.
16. March 12, 2007 Agenda for Board of Trustees (Revised March 9, 2009).
17. March 12, 2007 minutes, Board of Trustees.
18. March 19, 2007 minutes, Board of Trustees.
19. April 2, 2007 minutes, Board of Trustees.
20. April 16, 2007 minutes, Board of Trustees.
21. May 7, 2007 minutes, Board of Trustees.

22. May 21, 2007 agenda, Board of Trustees.
23. May 21, 2007 minutes, Board of Trustees.
24. June 4, 2007 minutes, Board of Trustees.
25. June 18, 2007 minutes, Board of Trustees.
26. June 25, 2007 minutes, Board of Trustees.
27. July 2, 2007 minutes, Board of Trustees.
28. July 9, 2007 minutes, Board of Trustees.
29. July 16, 2007 minutes, Board of Trustees.
30. August 6, 2007 minutes, Board of Trustees.
31. August 13, 2007 minutes, Board of Trustees
32. August 20, 2007 minutes, Board of Trustees.
33. September 17, 2007 minutes, Board of Trustees.
34. October 1, 2007 minutes, Board of Trustees.
35. November 5, 2007 minutes, Board of Trustees.
36. November 12, 2007 minutes, Board of Trustees.
37. November 19, 2007 minutes, Board of Trustees.
38. December 3, 2007 minutes, Board of Trustees.
39. December 17, 2007 minutes, Board of Trustees.
40. January 2, 2008 minutes, Board of Trustees (organizational meeting).
41. January 7, 2008 minutes, Board of Trustees.
42. February 4, 2008 minutes, Board of Trustees.
43. February 18, 2008 minutes, Board of Trustees.
44. March 3, 2008 minutes, Board of Trustees.

45. March 17, 2008 minutes, Board of Trustees.
46. March 24, 2008 minutes, Board of Trustees.
47. April 7, 2008 minutes, Board of Trustees.
48. April 14, 2008 minutes, Board of Trustees.
49. April 21, 2008 minutes, Board of Trustees.
50. May 12, 2008 minutes, Board of Trustees.
51. May 19, 2008 minutes, Board of Trustees.
52. June 2, 2008 minutes, Board of Trustees.
53. June 9, 2008 minutes, Board of Trustees.
54. June 16, 2008 minutes, Board of Trustees.
55. June 23, 2008 minutes, Board of Trustees.
56. September 2, 2008 minutes, Board of Trustees.
57. September 8, 2008 minutes, Board of Trustees.
58. September 15, 2008 minutes, Board of Trustees.
59. October 6, 2008 minutes, Board of Trustees.
60. October 20, 2008 minutes, Board of Trustees.
61. November 3, 2008 minutes, Board of Trustees.
62. November 10, 2008 minutes, Board of Trustees.
63. November 17, 2008 minutes, Board of Trustees.
64. December 1, 2008 minutes, Board of Trustees.
65. December 8, 2008 minutes, Board of Trustees.
66. December 15, 2008 minutes, Board of Trustees.
67. January 12, 2009 minutes, Board of Trustees.

68. January 19, 2009 minutes, Board of Trustees.
69. February 16, 2009 minutes, Board of Trustees.
70. February 23, 2009 minutes, Board of Trustees.
71. March 9, 2009 minutes, Board of Trustees (workshop).
72. March 9, 2009 minutes, Board of Trustees (meeting).
73. March 16, 2009 minutes, Board of Trustees.
74. March 23, 2009 minutes, Board of Trustees.
75. April 20, 2009 minutes, Board of Trustees.
76. May 11, 2009 minutes, Board of Trustees.
77. May 18, 2009 minutes, Board of Trustees.
78. June 15, 2009 minutes, Board of Trustees.
79. August 3, 2009 minutes, Board of Trustees.
80. November 14, 2008 meeting notice, Policy and Procedures Committee.
81. November 14, 2008 minutes, Policy and Procedures Committee.
82. December 5, 2008 meeting notice, Policy and Procedures Committee.
83. December 5, 2008 meeting notice, Policy and Procedures Committee.
84. all meeting notices for Policy and Procedures Committee.
85. all minutes for Policy and Procedures Committee.
86. Policy and Procedures notebook, Board of Trustees.
87. March 8, 2006 email containing Future Planning Committee minutes from March 1, 2006.
88. March 27, 2006 email from Bernie Dent to multiple recipients.
89. March 31, 2006 email from rvanfos6@aol.com to multiple recipients.

90. April 4, 2006 email from Bernie Dent to multiple recipients.
91. April 4, 2006 email from Bernie Dent to spletth@aol.com and others.
92. April 5, 2006 email from spletth@aol.com to multiple recipients.
93. August 8, 2006 letter from Mike Neal to Sharon Denson and Mary Lou Smith. (MSSD00089)
94. September 18, 2006 email from Mary Lou Smith to Tom Featheringill. (MSSD00024)
95. September 18, 2006 email from Tom Featheringill to Mary Lou Smith. (MSSD00025)
96. October 7, 2006 email from Sharon Denson to Mary Lou Smith. (MSSD01152)
97. October 12, 2006 Manatee County Easement Encroachment Agreement.
98. December 5, 2006 letter by Sharon Denson to Board of Trustees.
99. January 10, 2007 memo from Janet Jones to Trustees together with "Purpose of Hiring an Attorney" document dated January 9, 2007.
100. February 12, 2007 memo from Janet Jones to Trustees and Residents.
101. February 26, 2007 note re: section 849.01, Florida Statutes.
102. April 4, 2007 letter by Sharon Denson to Board of Trustees.
103. April 15, 2007 email by Sharon Denson to Mary Lou Smith. (MSSD01337)
104. April 16, 2007 handwritten documents entitled "Disaster Meeting".
105. John Vander Molen resignation from ARC wherein he advises "I am willing delay the effective date of my resignation . . ." with handwritten comment dated April 26, 2007.
106. May 8, 2007 memo from Janet Jones to TJ Miller.
107. May 14, 2007 letter from John Vander Molen to Janet Jones.
108. June 4, 2007 memo from John Vander Molen to Trustees (with Mediated Settlement Agreement).

109. June 4, 2007 memo from John Vander Molen to Trustees (subject: release of copies of the Mediated Settlement Agreement).
110. July 19, 2007 Marina Committee Meeting.
111. August 6, 2007 email from Tom Featheringill to Mary Lou Smith. (MSSD00065)
112. August 17, 2007 memo from Janet Jones to Joe Bigley.
113. August 20, 2007 email from Maggie D. Mooney to Mary Lou Smith (with email chain and attachment).
114. August 20, 2007 email from Maggie Mooney to Mary Lou Smith. (MSSD01300)
115. August 31, 2007 email by Mary Lou Smith re: [Trailer Estates] A possible solution! (bates label McNulty DT Docs 298).
116. November 6, 2007 memo from Bruce Smith to Pam Cole.
117. November 19, 2007 email from Martha Brauer to John Vander Molen.
118. December 4, 2007 email from Bruce Smith to trailerestatesfl@tampabay.rr.com with attachment.
119. December 7, 2007 memo from Janet Jones to Bruce Smith.
120. December 12, 2007 memo from Bruce Smith to Janet Jones.
121. December 12, 2007 memo from Janet Jones to Trustees.
122. January 23, 2008 memo from Janet Jones to Bruce Smith.
123. May 3, 2008 letter by Mary Lou Smith to Board of Trustees.
124. July 3, 2008 letter from John Vander Molen to Sharon Denson.
125. November 6, 2008 letter by Sharon Denson to Board of Trustees (with attachment).
126. December 2, 2008 Certificate of Canvassers.
127. February 17, 2009 memo from Martha Brauer to Trustees.
128. March 9, 2009 email from Sharon Denson to Mary Lou Smith. (MSSD01213)

129. March 19, 2009 letter by Bev Lew to Board of Trustees.
130. March 23, 2009 letter by Jennifer Cowan to Tom Shults.
131. October 21, 2009 incident report.
132. Undated email by Mary Lou Smith re: [Trailer Estates] A Web Site (bates label McNulty DT Docs 431).
133. December 2005 Tribune.
134. January 2006 Tribune.
135. May 2006 Tribune.
136. June 2006 Tribune.
137. July 2007 Tribune.
138. January 2009 Tribune.
139. 2007 Calendar – Janet Jones (redacted for health, financial, and other privileged matters not relevant to lawsuit).
140. 2008 Calendar – Janet Jones (redacted for health, financial, and other privileged matters not relevant to lawsuit).
141. Bids for marina improvements.
142. Map of Trailer Estates.
143. Mary Lou Smith's answers to Trailer Estates Park and Recreation District's interrogatories.
144. Sharon Denson's answers to Trailer Estates Park and Recreation District's interrogatories.
145. Plaintiffs' answers to all other Defendants' interrogatories.
146. Affidavit of Sharon Denson filed March 10, 2009.
147. Affidavit of Mary Lou Smith filed March 10, 2009.
148. Affidavit of Sharon Denson filed January 29, 2010.

149. Affidavit of Melanie Marken filed January 29, 2010.
150. Affidavit of Mary Lou Smith filed January 29, 2010.
151. All documents attached to the Third Amended Complaint.
152. All documents attached to the Second Amended Complaint.
153. All documents attached to the Amended Complaint.
154. All documents attached to the Complaint.
155. All pleadings and discovery requests and responses.
156. Any and all exhibits listed by any party to this action.

Respectfully submitted,

/s/ Hunter W. Carroll

Hunter W. Carroll
FB No. 0297630
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 and First Class U.S. Mail this 12th 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
jdye@dycfirm.com
Attorney for Defendant, Mary Lou McNulty

Kevin S. Hennessy, Esquire
Jennifer Cowen, Esquire
Lewis, Longman, Walker, P.A.
1001 Third Avenue West., Suite 670
Bradenton, FL 34205
Khennessy@llw-law.com
jcowan@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