

IN THE CIRCUIT COURT OF 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. 2008 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.

**DEFENDANT, TRAILER ESTATES PARK
AND RECREATION DISTRICT'S, NOTICE OF FILING**

COMES NOW the Defendant, Trailer Estates Park and Recreation District, and hereby
gives Notice of the filing the following:

1. Memoranda from John C. Vander Molen to Trailer Estates Trustees dated June 4, 2007.
2. Composite of pages from the deposition of John Vander Molen taken April 16, 2009.
3. Memo from Joe Salerno to Board of Trustees date stamped May 20, 2008.
4. Affidavit of Janet Jones dated November 5, 2009.
5. Manatee County Easement Encroachment Agreement dated October 12, 2006.
6. Composite of pages from the depositions of Peggy Durham (pgs. 108-110) taken December 21, 2009; Janet Jones (pgs. 32-33) taken May 19, 2009; Mary Lou McNulty (pgs. 41-43) taken August 12, 2009; Mary Lou Smith (pg. 19) taken August 27, 2009; and Sharon Denson (pgs. 14-15) taken May 6, 2009.
7. Trailer Estates Park and Recreation District Policy and Procedure 17.

8. Order Granting in Part and Denying in Part Janet Jones' Motion for Partial Summary Judgment entered February 8, 2010.
9. Plaintiffs' Complaint filed November 26, 2008.
10. Trailer Estates Park and Recreation District's Charter.
11. Trailer Estates Park and Recreation District's Bylaws.
12. Trailer Estates Park and Recreation District Policy and Procedure 40.
13. Trailer Estates Park and Recreation District Policy and Procedure 4.
14. Trailer Estates Park and Recreation District Workshop Minutes – December 8, 2008.
15. Trailer Estates Park and Recreation District Minutes – December 15, 2008.
16. Trailer Estates Park and Recreation District – Workshop Minutes – February 23, 2009.
17. Trailer Estates Park and Recreation District – Minutes – March 9, 2009.
18. Trailer Estates Park and Recreation District – Minutes – March 16, 2009
19. Memo from Janet Jones to Trustees and Residents dated February 12, 2007.
20. Trailer Estates Park and Recreation District – Minutes – February 19, 2007
21. Trailer Estates Park and Recreation District – Minutes – May 19, 2008.
22. Trailer Estates Park and Recreation District – Minutes – June 16, 2008.
23. Trailer Estates Park and Recreation District – Round Table Recreation Discussion – Minutes – January 13, 2009.
24. Trailer Estates Park and Recreation District – Workshop Minutes – May 28, 2009.
25. Trailer Estates Park and Recreation District – Minutes – November 6, 2006.
26. Excerpt from the hearing December 22, 2009 – page 31.
27. Excerpt of deposition of Margo Cushman taken December 17, 2009 – pages 103-104.

28. Trailer Estates Park and Recreation District's Rules and Regulations.
29. Trailer Estates Park and Recreation District – Minutes – January 2, 2009.
30. Trailer Estates Park and Recreation District – Minutes – September 5, 2006.
31. Trailer Estates Park and Recreation District – Minutes – January 5, 2009.
32. Trailer Estates Park and Recreation District – Minutes – December 21, 2009.

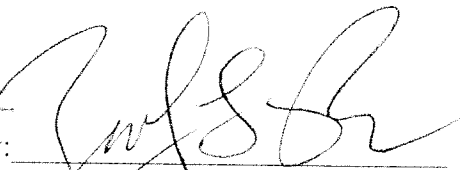
The purpose for the filing of the above listed documents is for use at the hearing on Defendant, Trailer Estates Park and Recreation District's motion for Partial Summary Judgment, now scheduled to be heard on March 5, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been hand-delivered to Kevin S. Hennessy, Esquire, Lewis, Longman & Walker, P.A., 1001 Third Avenue West, Suite 670, Bradenton, Florida 34205, Attorney for Plaintiffs; and forwarded by U.S. Mail to Robert E. Turffs, P.A., 1444 First Street, Suite B, Sarasota, Florida 34236, Attorney for Defendant, Joseph Salerno; James D. Dye, Esquire, Dye Deitrich, Petruff & St. Paul, P.L., 1111 3rd Avenue W., Bradenton, FL 34205-7834, Attorney for Defendant, Mary Lou McNulty; Hunter W. Carroll, Esquire, Matthews, Eastmoore, et al., 1777 Main Street, Suite 500, Sarasota, FL 34236, Attorney for Defendant, Janet Jones; Daniel E. Scott, Esquire, Daniel E. Scott, P.A., 2033 Main Street, Suite 408, Sarasota, FL 34237, Attorney for Defendant, John Vander Molen, on this 12th day of February, 2010.

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