

**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.

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**NOTICE OF INTENT TO RELY UPON DOCUMENTS  
FILED IN SUPPORT OF AND IN OPPOSITION TO  
DEFENDANT JONES' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiffs, MARY LOU SMITH and SHARON DENSON, by and through their undersigned counsel, request the parties and the Court hereby take notice that they intend to rely upon the following previously filed documents in the Court's consideration of the Motion for Partial Summary Judgment filed by Defendant Trailer Estates Park and Recreation District, Motion for Partial Summary Judgment filed by Defendant Salerno and the Motion for Partial Summary Judgment filed by Defendant Vander Molen, and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida Law:

1. Notice of Filing Documents in Support of Plaintiffs' Memorandum in Opposition to Defendant Jones' Motion for Partial Summary Judgment (Continued Exhibits 11-24), dated December 17, 2009, docket entry 488.

2. Plaintiffs' Request for Judicial Notice in Support of Plaintiffs' Memorandum in Opposition to Defendant Jones' Motion for Partial Summary Judgment, dated December 17, 2009, docket entry 487.

3. Notice of Filing Documents in Support of Plaintiffs' Memorandum in Opposition to Defendant Jones' Motion for Partial Summary Judgment (Documents 9-10 discs, not scannable), dated December 17, 2009, docket entry 486.

4. Notice of Filing Documents in Support of Plaintiffs' Memorandum in Opposition to Defendant Jones' Motion for Partial Summary Judgment (Documents 1-8), dated December 17, 2009, docket entry 483.

5. Plaintiffs' Notice of Filing Partial Deposition Transcripts in Support of Plaintiffs' Memorandum in Opposition to Defendant Jones' Motion for Partial Summary Judgment dated December 17, 2009 and docket entry 482.

6. Janet Jones' Notice of Filing Selected Portions of Deposition Transcripts in Support of her Motion for Partial Summary Judgment dated November 5, 2009, docket entry 440.

Respectfully submitted,



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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 facsimile and U.S. Mail, this 26<sup>th</sup> day of February, 2010.

  
KEVIN S. HENNESSY, ESQUIRE