

**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.

**NOTICE OF FILING DEPOSITION EXCERPTS IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO TRAILER ESTATES PARK
AND RECREATION DISTRICT'S, JOHN VANDER MOLEN'S
AND JOSEPH SALERNO'S MOTIONS FOR PARTIAL SUMMARY JUDGMENT**

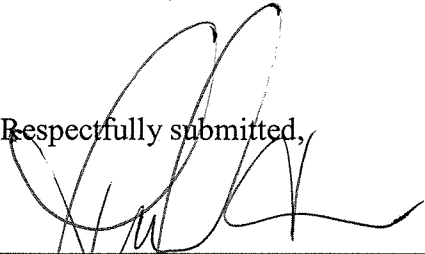
Plaintiffs, MARY LOU SMITH and SHARON DENSON, by and through their undersigned counsel, file the following deposition excerpts in support of Plaintiffs' Opposition to Trailer Estates Park and Recreation District's, John Vander Molen's, and Joseph Salerno's Motions for Partial Summary Judgment, and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida Law.

1. Trailer Estates Park and Recreation District Representative, May 20, 2009, Pgs. 25-28; 41-51; 99-110; 125-128, 142-146.
2. Continuation of Trailer Estates Park and Recreation District Representative, August 28, 2009, Pgs. 164-167; 214-235; 284-292; 321-325; 333-335; and 356-357.
3. Mark Barnebey, April 17, 2009, Pgs. 30-36; 44-48; and Exhibit 4.
4. Pamela Cole, May 19, 2009, Pgs. 35-40; 85-91; and 138-143.
5. Continuation of Pamela Cole, August 10, 2009, Pgs. 63-64.
6. Margo Cushman, December 17, 2009, Pgs. 96-99; 126-128; 168-169; 171-172; and Exhibits 8-9.
7. Plaintiff, Sharon Denson, May 6, 2009, Pgs. 42-49; 57-58; 116-118; 123; 134-136; 138-139; 153-155; 163-168; 262-263; and 287-289.
8. Peggy Ann Durham, December 21, 2009, Pgs. 55-59; 101-122; 135-137; 142-144; 153; Exhibit 3, 4, 10, 12, and 13.
9. Harry Fitzpatrick, August 11, 2009, Pgs. 16-20; 22; and 38-40.
10. Fred Hoch, August 18, 2009, Pgs. 8-9; 19-21; 50-54; and 65-66.
11. Defendant, Janet Jones, May 19, 2009, Pgs. 19-25; 27; 32-37; 53-55; and 92-93.
12. Beverly Lew, May 26, 2009, Pgs. 66-73; and 120-121.
13. Defendant, Mary Lou McNulty, August 12, 2009, Pgs. 39-41; 67-70; 103-112; and 117-119.
14. Thelma Jo Miller, April 17, 2009, Pgs. 15-17; 81-86; and Exhibit 2.
15. Gail Opper, December 1, 2009, Pgs. 15-16; 84-90; 103-105; 107-120; 131-133; Exhibit 4, 5, 6, and 7.
16. Defendant, Joseph Salerno, August 19, 2009, Pgs. 58-64; 85-87; 93-99 and Exhibit 2.

17. Plaintiff, Mary Lou Smith, August 27, 2009, Pgs. 25-24; and 43-45.

18. Defendant, John Vandermolen, April 16, 2009, Pgs. 35-36; 44; 51-55; 93-105; 107-135;
Exhibit 6, 7, 8, and 9.

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 *Hand Delivery*, this 7th day of March, 2010.



JENNIFER R. COWAN, ESQUIRE