

**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 DOCUMENTS 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 supplemental documents 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. Plaintiffs' Trial Exhibit # 5.
2. Plaintiffs' Trial Exhibit # 24.
3. Plaintiffs' Trial Exhibit # 28.
4. Plaintiffs' Trial Exhibit # 32.
5. Plaintiffs' Trial Exhibit # 35.

6. Plaintiffs' Trial Exhibit # 36.
7. Plaintiffs' Trial Exhibit # 38.
8. Plaintiffs' Trial Exhibit # 42.
9. Plaintiffs' Trial Exhibit # 43.
10. Plaintiffs' Trial Exhibit # 44.
11. Plaintiffs' Trial Exhibit # 45.
12. Plaintiffs' Trial Exhibit # 48.
13. Plaintiffs' Trial Exhibit # 53.
14. Plaintiffs' Trial Exhibit # 56.
15. Plaintiffs' Trial Exhibit # 73.
16. Plaintiffs' Trial Exhibit # 97.
17. Plaintiffs' Trial Exhibit # 98.
18. Plaintiffs' Trial Exhibit # 102.
19. Plaintiffs' Trial Exhibit # 118.
20. Plaintiffs' Trial Exhibit # 119.
21. Plaintiffs' Trial Exhibit # 125.
22. Plaintiffs' Trial Exhibit # 139.
23. Plaintiffs' Trial Exhibit # 140.
24. Plaintiffs' Trial Exhibit # 141.
25. Plaintiffs' Trial Exhibit # 142.
26. Plaintiffs' Trial Exhibit # 143.
27. Plaintiffs' Trial Exhibit # 151.
28. Plaintiffs' Trial Exhibit # 161.
29. Plaintiffs' Trial Exhibit # 165.

30. Plaintiffs' Trial Exhibit # 167.
31. Plaintiffs' Trial Exhibit # 183.
32. Plaintiffs' Trial Exhibit # 185.
33. Plaintiffs' Trial Exhibit # 197.
34. Plaintiffs' Trial Exhibit # 205.
35. Plaintiffs' Trial Exhibit # 206.
36. Plaintiffs' Trial Exhibit # 207.
37. Plaintiffs' Trial Exhibit # 217.
38. Plaintiffs' Trial Exhibit # 232.
39. Plaintiffs' Trial Exhibit # 323.
40. Plaintiffs' Trial Exhibit # 332.
41. Plaintiffs' Trial Exhibit # 339.
42. Plaintiffs' Trial Exhibit # 341.
43. Plaintiffs' Trial Exhibit # 346.
44. Plaintiffs' Trial Exhibit # 351.
45. Plaintiffs' Trial Exhibit # 353.
46. Plaintiffs' Trial Exhibit # 356.
47. Plaintiffs' Trial Exhibit # 357.
48. Plaintiffs' Trial Exhibit # 359.
49. Plaintiffs' Trial Exhibit # 367.
50. Plaintiffs' Trial Exhibit # 373.
51. Plaintiffs' Trial Exhibit # 375.
52. Plaintiffs' Trial Exhibit # 378.
53. Plaintiffs' Trial Exhibit # 379.

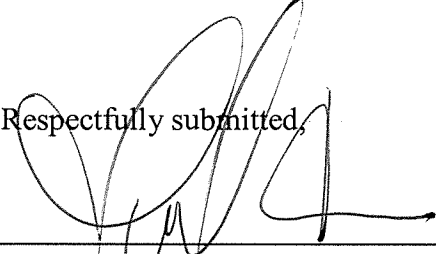
54. Plaintiffs' Trial Exhibit # 380.
55. Plaintiffs' Trial Exhibit # 382.
56. Plaintiffs' Trial Exhibit # 385.
57. Plaintiffs' Trial Exhibit # 389.
58. Plaintiffs' Trial Exhibit # 403.
59. Plaintiffs' Trial Exhibit # 405.
60. Plaintiffs' Trial Exhibit # 414.
61. Trailer Estates Park and Recreation District Policy and Procedure (PP) 7.
62. Trailer Estates Park and Recreation District Policy and Procedure (PP) 16.
63. Trailer Estates Park and Recreation District Policy and Procedure (PP) 40.
64. Trailer Estates Park and Recreation District Policy and Procedure (PP) 47.
65. Trailer Estates Park and Recreation District Policy and Procedure Committee Meeting Minutes, November 30, 2007.
66. Trailer Estates Park and Recreation District Policy and Procedure Committee Meeting Minutes, December 7, 2007.
67. Trailer Estates Park and Recreation District Policy and Procedure Committee Meeting Minutes, December 28, 2007.
68. Trailer Estates Park and Recreation District Future Planning Minutes, December 3, 2008.
69. Trailer Estates Park and Recreation District Workshop Meeting Minutes, October 30, 2009.
70. Trailer Estates Park and Recreation District Workshop Meeting document by Janet Jones, October 30, 2009.
71. Trailer Estates Park and Recreation District Board of Trustees Meeting Minutes, November 6, 2006.

72. Trailer Estates Park and Recreation District Board of Trustees Meeting Minutes, November 5, 2007.
73. Trailer Estates Park and Recreation District Workshop Meeting Minutes, June 9, 2008.
74. Trailer Estates Park and Recreation District Board of Trustees Meeting Minutes, November 17, 2008.
75. Trailer Estates Park and Recreation District Workshop Meeting Minutes, December 8, 2008.
76. Trailer Estates Park and Recreation District Workshop Meeting Minutes, January 12, 2009.
77. Trailer Estates Park and Recreation District Workshop Meeting Minutes, March 23, 2009.
78. Trailer Estates Park and Recreation District Board of Trustee Meeting Minutes, April 6, 2009.
79. Trailer Estates Park and Recreation District Board of Trustee Emergency Special Meeting Minutes, May 28, 2009.
80. Order Granting In Part and Denying In Part Janet Jones' Motion for Partial Summary Judgment, February 8, 2010.
81. Memorandum from Janet Jones to Trustees, February 2, 2007.
82. Memorandum from John Vandermolen to Janet Jones, February 28, 2007.
83. Fax Coversheet from Mark P. Barnebey to T. J. Miller and John Vandermolen, June 1, 2007.
84. Memorandum from Scott E. Rudacille, thru Mark P. Barnebey, to Bruce Smith, October 19, 2007.
85. Fax Memorandum from Martha Brauer to Scott E. Rudacille, January 29, 2009.

86. Complaint to Trailer Estates Park and Recreation District by Beverly Lew, March 16, 2009.
87. E-Mail from Sharon Denson to T.J. Miller, July 2, 2008, Re: CERT Tribune Article for August.
88. E-Mail from Sharon Denson to T.J. Miller, August 5, 2008, Re: CERT Article for Sept. Tribune.
89. E-Mail from T.J. Miller to Martha Brauer, March 27, 2009, Re: Channel 95.
90. E-Mail from Martha Brauer to Pam Cole, cc: T.J. Miller, July 25, 2009, Re: By Law Amendment.
91. E-Mail from Martha Brauer to Pam Cole, cc: T.J. Miller, July 26, 2009, Re: By Law Amendment.
92. E-Mail from T.J. Miller to Martha Brauer, August 6, 2009, Re: Videos/Audios.
93. E-Mail from Pam Cole to Martha Brauer, cc: T.J. Miller, August 15, 2009, Re: Treasurer's Reports.
94. E-Mail from Martha Brauer to Donnarich5508@netzero.net, cc: Tom Shults, Mark Barnebey, Scott Rudacille, T.J. Miller, John Vandermolen, September 10, 2009.
95. E-Mail from Martha Brauer to T.J. Miller, November 8, 2009, Re: Monday's Agenda Nov. 9.
96. Letter from L. Norman Vaughn-Birch, Esquire to Janet Jones, October 19, 2006.
97. Letter from Sharon Denson to Mary Lou McNulty, November 6, 2006.
98. Letter from Mary Lou Smith to Mary Lou McNulty, November 10, 2006.
99. Letter from Janet Jones to Trailer Estates Property Owners, April 1, 2008.
100. Letter from Sharon Denson to John Vandermolen, June 26, 2008.
101. Kirk Pinkerton Invoice to Trailer Estates Park and Recreation District, March 4, 2009.

102. Letter to TE Board of Trustees from Beverly Lew, September 10, 2009.
103. Letter from Arlene Force, September 10, 2009.
104. Letter from Mary Huston to Board of Trustees, September 10, 2009.
105. Letter from Judy Reidel to Martha Brauer, September 14, 2009.
106. Trailer Estates Park and Recreation District "Bingo".
107. April Trailer Estates Tribune, Let's Talk Club Meeting, February 22, 2007.
108. Trailer Estates Park and Recreation District "Tribune Articles".
109. Channel 96 Flyer.
110. Channel 95 Note, July 8, 2009.
111. Trailer Estates Park and Recreation District ARC Meeting Schedule, 2006.
112. Trailer Estates Park and Recreation District ARC Meeting Schedule, 2007.
113. Trailer Estates Park and Recreation District Building Request Log, 2005-2007.
114. Trailer Estates Park and Recreation District Tribune, pages 1 through 12, November 2007.
115. Trailer Estates Park and Recreation District Policy and Procedure Committee meeting notice, December 5, 2008.

Respectfully submitted,



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE D. MOONEY-PORTALE, ESQUIRE
Florida Bar No. 0555924
JENNIFER R. COWAN, ESQUIRE
Florida Bar No. 0038081
Lewis, Longman & Walker, P.A.
1001 3rd Avenue West, Suite 670
Bradenton, Florida 34205
Telephone: (941) 708-4040
Facsimile: (941) 708-4024
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 2nd day of March, 2010.



JENNIFER R. COWAN, ESQUIRE