

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

MARY LOU SMITH, et. al.,

Plaintiff,

vs.

Case No. 2008-CA-11315

TRAILER ESTATES PARK AND RECREATION
DISTRICT, et. al.,

Defendants.

**JANET JONES' NOTICE OF FILING DOCUMENTS
IN SUPPORT OF HER SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT**

Defendant Janet Jones gives notice that on April 7, 2010, she filed with the Court the
attached:

1. Plaintiff, Mary Lou Smith's Answers to her Second Set of Interrogatories dated February 8, 2010.
2. Plaintiff, Sharon Denson's Answers to her Second Set of Interrogatories dated February 8, 2010.
3. Pages 98-99 of Mary Lou McNulty's August 12, 2009 deposition.

These documents are being filed in support of Janet Jones' Second Motion for Partial Summary Judgment and Memorandum of Law in Support, and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida law.

Respectfully submitted,

MATTHEWS, EASTMOORE, HARDY
CRAUWELS & GARCIA, P.A.

/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 United States Mail this 7th day of April 2010, to:

James D. Dye, Esquire
Dye, Deitrich, Ptruff & St. Paul, P.L.
1111 Third Avenue West, Suite 300
Bradenton, FL 34205
jdye@dyefirm.com
Attorney for Defendant, Mary Lou McNulty

Kevin S. Hennessy, Esquire
Lewis, Longman, Walker, P.A.
1001 Third Avenue West, Suite 670
Bradenton, FL 34205
Khennessy@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
Zachary Ross, Esquire
Kirk, Pinkerton, P.A.
50 Central Avenue, Suite 700
Sarasota, FL 34236
tshults@kirkpinkerton.com
zross@kirkpinkerton.com
*Attorney for Defendant, Trailer Estates Park
and Recreation District*

/s/ Hunter W. Carroll

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

MARY LOU SMITH an individual, and
SHARON DENSON, an individual

Plaintiffs,

vs.

CASE NO.: 08 CA 11315
Division B

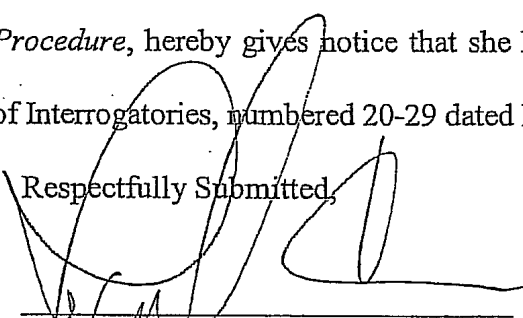
TRAILER ESTATES PARK AND
RECREATION DISTRICT,
an independent special taxing district,
JANET JONES, an individual,
JOHN VANDERMOLEN, an individual,
JOSEPH SALERNO, an individual, and
MARY LOU MCNULTY, an individual

Defendants.

MARY LOU SMITH'S NOTICE OF SERVING ANSWERS TO
DEFENDANT, JANET JONES' SECOND SET OF INTERROGATORIES

Plaintiff, MARY LOU SMITH, by and through her undersigned Counsel and pursuant to
Rule 1.340, *Florida Rules of Civil Procedure*, hereby gives notice that she has served answers to
Defendant, Janet Jones' Second Set of Interrogatories, numbered 20-29 dated February 8, 2010.

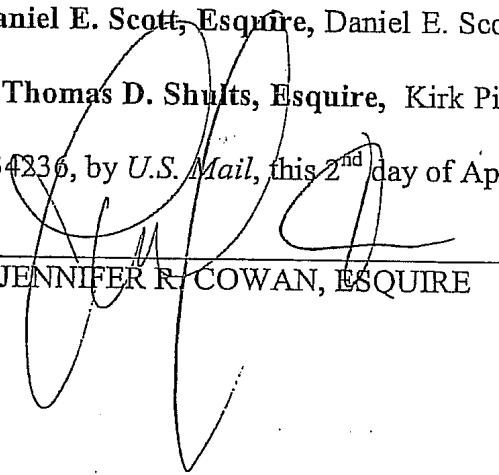
Respectfully Submitted,



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE MOONEY-PORTALE, ESQUIRE
Florida Bar No. 0555924
JENNIFER R. COWAN, ESQUIRE
Florida Bar No. 038081
Lewis, Longman & Walker, P.A.
1001 3rd Avenue West, Suite 670
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 U.S. Mail, this 2nd day of April, 2010.**



JENNIFER R. COWAN, ESQUIRE

ANSWERS TO INTERROGATORIES

20. With respect to allegation 37(y) of the Third Amended Complaint, please identify with specificity each communication concerning "the application of OSHA to Trailer Estates" that Defendant Jones allegedly had with Bruce Smith or John Vander Molen that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such issue(s).

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from December 22, 2009, related to Jones' First Motion for Partial Summary Judgment and March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing.

21. With respect to allegation 37(bb) of the Third Amended Complaint, please identify with specificity each "District procedures regarding donations from clubs and funding to the clubs" allegedly discussed by Defendant Jones and Pam Cole that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such issue(s).

ANSWER: In allegation 37bb the Plaintiffs do not contend that Trustees Jones and Cole discussed District procedures regarding donations from clubs and funding to the clubs. Furthermore, discovery is ongoing.

22. With respect to allegation 37(ee) of the Third Amended Complaint, please identify with specificity each communication concerning "withdrawal of Vandermolen's [sic] resignation from ARC" that allegedly discussed by Defendant Jones and John Vander Molen that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such matter.

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from December 22, 2009, related to Jones' First Motion for Partial Summary Judgment and March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing.

23. With respect to allegation 37(tt) of the Third Amended Complaint, please identify with specificity each communication at the alleged pre-meeting about "raising the marina and storage lot fees" that Defendant Jones allegedly had with another then-Trustee that you contend is in violation of the Sunshine Law; and as to each such communication, please identify the then Trustee with whom Defendant Jones communicated and whether and when the Board of Trustees took action on such matters.

ANSWER: See testimony of Jones dated May 19, 2009, wherein she states on pages 67-70 that she attended and participated in pre-meetings. Jones was present at the March 21, 2005, board meeting, where it was confirmed that a pre-meeting was held concerning the recent increase of boat slips and storage lot rates. See Plaintiffs Trial Exhibit 16, the March 21, 2005 minutes of the Board of Trustees meeting. Plaintiff is unaware of a meeting where this violation was cured. Furthermore, discovery is ongoing.

24. With respect to allegation 37(aaa) of the Third Amended Complaint, please identify each communication about "the appointment of a SAFE Committee" that Defendant Jones allegedly had with Bruce Smith that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such matter.

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of Jones' First Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to Jones' First Motion for Partial Summary Judgment and the the hearing transcript from December 22, 2009, related to Jones' First Motion for Partial Summary Judgment. Furthermore, discovery is ongoing.

25. With respect to allegation 37(qqq) of the Third Amended Complaint, please identify each and every communication concerning the adoption "of page 4 of the Public Records Policy" that Defendant Jones allegedly had with another then-Trustee that you contend is in violation of the Sunshine Law; and as to each communication, please identify the then-Trustee with whom Defendant Jones allegedly communicated and whether and when the Board of Trustees took action on such matters allegedly discussed.

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing. Without waiving objections, Jones was chair of the Policy and Procedure Committee which drafted and revised the District's public records policy. Further, Jones was the Chairman and present at the January 7, 2008 Board of Trustees meeting, where PP24 (3 pages) was adopted as depicted in the minutes of that meeting which were corrected post-litigation. Jones was the Chairman and present at the March 17, 2008 at a Board of Trustees meeting, Defendant Vander Molen stated concerns regarding demands for public records. On March 18, 2008, Defendant Vander Molen sent a memo to all the trustees attaching a fee schedule as page four of PP24. Jones allowed adoption of a revision to a District policy outside of a public vote. Plaintiff is unaware of a meeting where this violation was cured.

26. With respect to allegation 37(rrr) of the Third Amended Complaint, please identify each and every communication about the decision "to deny the publication of articles authored by Denson in the Tribune" that Defendant Jones allegedly had with another then Trustee that you contend is in violation of the Sunshine Law; and as to each such communication, please identify the then-Trustee with whom Defendant Jones allegedly communicated and whether and when the Board of Trustees took action on such matter.

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing. Without waiving objection, please see Plaintiffs response to interrogatory 13 of Jones' First Set of Interrogatories. Plaintiff is unaware of a meeting where this violation was cured.

27. With respect to allegation 37(sss) of the Third Amended Complaint, please identify with specificity each and every communication concerning "the disaster plan" that Defendant Jones allegedly had with Defendant McNulty, Pam Cole, or Margo Cushman that you contend is in violation of the Sunshine Law; and for each such communication, identify whether and when the Board of Trustees took action on such matter.

ANSWER: On April 16, 2007, the Disaster Committee had a meeting to develop a disaster plan for the residents. This meeting was not properly noticed as a board meeting. Trustees Janet Jones, Mary Lou McNulty, Pam Cole, and Margo Cushman attended, all communicated and participated. Plaintiff is unaware of a meeting where this violation was cured. See trial exhibit 362 and document bates numbered: McNulty DT Docs – 000002-000003; Video clip and minutes from the 5/21/07 Board of Trustees meeting; Deposition Testimony of Mary Lou McNulty dated 8/12/09 pages 89-94, 182-185; Deposition Testimony of Margo Cushman dated 12/17/09 pages 90-94, 182-185; Deposition Testimony of Janet Jones dated 5/19/09 pages 94-95. Furthermore, discovery is ongoing.

28. With respect to allegation 37(vvv) of the Third Amended Complaint, please identify with specificity each and every communication involving "the future planning survey" that Defendant Jones allegedly had with Defendant McNulty that you contend is in violation of the Sunshine Law; and as to each communication, identify whether and when the Future Planning Committee took action to make a recommendation, and whether and when the Board of Trustees took action on such recommendation from the Future Planning Committee.

ANSWER: In or around November 4, 2005, Trustees Jones and McNulty communicated re: the future planning survey and proposed budget. Plaintiff is unaware of a meeting where this violation was cured. See trial exhibit 323 and document bates numbered: TE Docs 7-26-07 PRR00057-59 and McNulty DT Docs 000093-95; Deposition Testimony of Mary Lou McNulty dated 8/12/09 pages 85-87; Deposition Testimony of Janet Jones dated 5/19/09 pages 8-12. Furthermore, discovery is ongoing.

29. With respect to allegation 37(jjjj) of the Third Amended Complaint, please identify with specificity each and every communication concerning "the appointment of McNulty as second vice chair" that Defendant Jones allegedly had with Defendant McNulty or TJ Miller that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees acted on such matter(s).

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing.

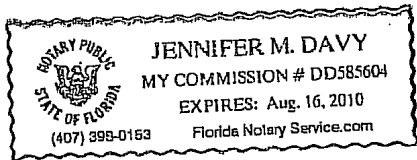
Dated: April 2, 2010

By: Mary Lou Smith
MARY LOU SMITH

STATE OF Florida)
COUNTY OF Manatee)

The foregoing instrument was acknowledged before me this 2nd day of APRIL, 2010, by Mary Lou Smith, in the above-styled cause, who is personally known to me or has produced _____ as identification, who being duly sworn, deposes and says that he/she has read the foregoing Answers to Interrogatories and that the same are true and correct to the best of his/her knowledge.

Jennifer M. Davy
NOTARY PUBLIC



Jennifer M. Davy
PRINTED NAME OF NOTARY PUBLIC

My Commission Expires: 8/2010

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

MARY LOU SMITH an individual, and
SHARON DENSON, an individual

Plaintiffs,

vs.

CASE NO.: 08 CA 11315
Division B

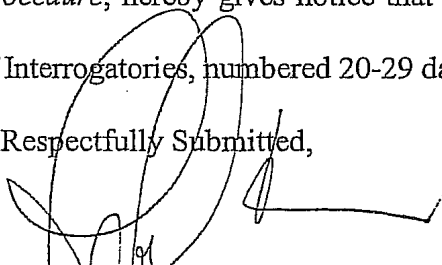
TRAILER ESTATES PARK AND
RECREATION DISTRICT,
an independent special taxing district,
JANET JONES, an individual,
JOHN VANDERMOLEN, an individual,
JOSEPH SALERNO, an individual, and
MARY LOU MCNULTY, an individual

Defendants.

**SHARON DENSON'S NOTICE OF SERVING ANSWERS TO
DEFENDANT, JANET JONES' SECOND SET OF INTERROGATORIES**

Plaintiff, SHARON DENSON, by and through her undersigned Counsel and pursuant to Rule 1.340, *Florida Rules of Civil Procedure*, hereby gives notice that she has served answers to Defendant, Janet Jones' Second Set of Interrogatories, numbered 20-29 dated February 8, 2010.

Respectfully Submitted,



KEVIN S. HENNESSY, ESQUIRE
Florida Bar No. 0602558
MAGGIE MOONEY-PORTALE, ESQUIRE
Florida Bar No. 0555924
JENNIFER R. COWAN, ESQUIRE
Florida Bar No. 038081
Lewis, Longman & Walker, P.A.
1001 3rd Avenue West, Suite 670
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. Shuats, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *U.S. Mail*, this 2nd day of April, 2010.



JENNIFER R. COWAN, ESQUIRE

ANSWERS TO INTERROGATORIES

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ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to Jones' First Motion for Partial Summary Judgment and the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from December 22, 2009, related to Jones' First Motion for Partial Summary Judgment and March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing.

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ANSWER: In allegation 37bb the Plaintiffs do not contend that Trustees Jones and Cole discussed District procedures regarding donations from clubs and funding to the clubs. Furthermore, discovery is ongoing.

22. With respect to allegation 37(ee) of the Third Amended Complaint, please identify with specificity each communication concerning "withdrawal of Vandermolen's [sic] resignation from ARC" that allegedly discussed by Defendant Jones and John Vander Molen that you contend is in violation of the Sunshine Law; and as to each such communication, please identify whether and when the Board of Trustees took action on such matter.

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ANSWER: See testimony of Jones dated May 19, 2009, wherein she states on pages 67-70 that she attended and participated in pre-meetings. Jones was present at the March 21, 2005, board meeting, where it was confirmed that a pre-meeting was held concerning the recent increase of boat slips and storage lot rates. See Plaintiffs Trial Exhibit 16, the March 21, 2005 minutes of the Board of Trustees meeting. Plaintiff is unaware of a meeting where this violation was cured. Furthermore, discovery is ongoing.

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26. With respect to allegation 37(rrr) of the Third Amended Complaint, please identify each and every communication about the decision "to deny the publication of articles authored by Denson in the Tribune" that Defendant Jones allegedly had with another then Trustee that you contend is in violation of the Sunshine Law; and as to each such communication, please identify the then-Trustee with whom Defendant Jones allegedly communicated and whether and when the Board of Trustees took action on such matter.

ANSWER: Objection, oppressive, unduly burdensome, meant to annoy and needlessly increase the cost of litigation. This allegation was previously the subject of the District's Motion for Partial Summary Judgment. Please see all documents and deposition excerpts filed in support of and opposition to the District's Motion for Partial Summary Judgment. Also, please see the hearing transcripts from March 5, 2010, and March 22, 2010, related to the District's Motion for Partial Summary Judgment. Furthermore, discovery is ongoing. Without waiving objection, please see Plaintiffs response to interrogatory 13 of Jones' First Set of Interrogatories. Further, Plaintiff authored a "C.E.R.T." article which was denied publication. In July 2008, Plaintiff sought publication of her article in the August 2008 edition of the Tribune. Trustee McNulty denied the publication of the article. The District does not have an adopted policy regarding the content of the Tribune, yet at least two articles submitted by the Plaintiffs have been rejected. Jones was Chairman at the time of the rejection of these articles. Formal board actions related to these rejections did not occur at a public meeting, yet the content was refused. Plaintiff is unaware of a meeting where this violation was cured.

27. With respect to allegation 37(sss) of the Third Amended Complaint, please identify with specificity each and every communication concerning "the disaster plan" that Defendant Jones allegedly had with Defendant McNulty, Pam Cole, or Margo Cushman that you contend is in violation of the Sunshine Law; and for each such communication, identify whether and when the Board of Trustees took action on such matter.

ANSWER: On April 16, 2007, the Disaster Committee had a meeting to develop a disaster plan for the residents. This meeting was not properly noticed as a board meeting. Trustees Janet Jones, Mary Lou McNulty, Pam Cole, and Margo Cushman attended, all communicated and participated. Plaintiff is unaware of a meeting where this violation was cured. See trial exhibit 362 and document bates numbered: McNulty DT Docs – 000002-000003; Video clip and minutes from the 5/21/07 Board of Trustees meeting; Deposition Testimony of Mary Lou McNulty dated 8/12/09 pages 89-94, 182-185; Deposition Testimony of Margo Cushman dated 12/17/09 pages 90-94, 182-185; Deposition Testimony of Janet Jones dated 5/19/09 pages 94-95. Furthermore, discovery is ongoing.

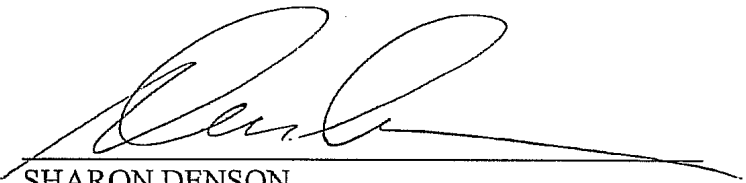
28. With respect to allegation 37(vvv) of the Third Amended Complaint, please identify with specificity each and every communication involving "the future planning survey" that Defendant Jones allegedly had with Defendant McNulty that you contend is in violation of the Sunshine Law; and as to each communication, identify whether and when the Future Planning Committee took action to make a recommendation, and whether and when the Board of Trustees took action on such recommendation from the Future Planning Committee.

ANSWER: In or around November 4, 2005, Trustees Jones and McNulty communicated re: the future planning survey and proposed budget. Plaintiff is unaware of a meeting where this violation was cured. See trial exhibit 323 and document bates numbered: TE Docs 7-26-07 PRR00057-59 and McNulty DT Docs 000093-95; Deposition Testimony of Mary Lou McNulty dated 8/12/09 pages 85-87; Deposition Testimony of Janet Jones dated 5/19/09 pages 8-12. Furthermore, discovery is ongoing.

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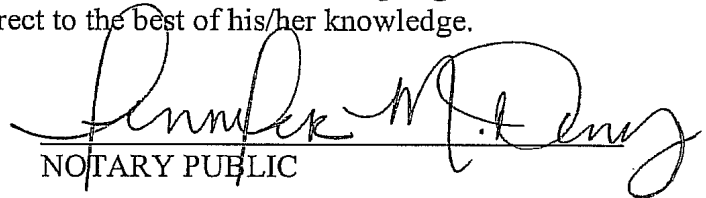
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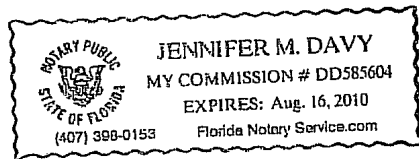
Dated: 4/2/, 2010

By: 
SHARON DENSON

STATE OF Florida)
COUNTY OF Manatee)

The foregoing instrument was acknowledged before me this 2nd day of April, 2010, by Sharon Denson, in the above-styled cause, who is personally known to me or has produced _____ as identification, who being duly sworn, deposes and says that he/she has read the foregoing Answers to Interrogatories and that the same are true and correct to the best of his/her knowledge.


NOTARY PUBLIC



Jennifer M. Davy
PRINTED NAME OF NOTARY PUBLIC

My Commission Expires: 8/2010

IN THE CIRCUIT COURT OF THE
TWELFTH JUDICIAL CIRCUIT OF THE
STATE OF FLORIDA IN AND FOR MANATEE COUNTY

CIRCUIT CIVIL CASE NO. 2008-CA-11315

-----X
MARY LOU SMITH, an individual, and :
SHARON DENSON, an individual, :
: :
Plaintiffs, :
: DEPOSITION OF
vs. :
: MARY LOU McNULTY
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. :
-----X

TAKEN BY: THE PLAINTIFFS HEREIN

BEFORE: JOANN L. ZECK
Court Reporter
Notary Public
State of Florida at Large

DATE: August 12, 2009
Commencing at 1:05 P.M.

PLACE: Lewis, Longman & Walker, P.A.
1001 Third Avenue West
Suite 670
Bradenton, Florida 34205

APPEARANCES: JENNIFER R. COWAN, Esquire
Lewis, Longman & Walker, P.A.
1001 Third Avenue West
Suite 670
Bradenton, Florida 34205
Appearing on Behalf of the
Plaintiffs

1 A No.

2 Q Had standing committees been disbanded before
3 in the past?

4 A I don't recall any being disbanded, no.

5 Q During that December 2008 Board meeting, you
6 made a comment that a committee cannot work with the
7 Board. What committee were you speaking about?

8 MR. ROSS: Object to form.

9 THE DEPONENT: The Future Planning. I quoted
10 it from a website.

11 BY MS. COWAN:

12 Q That Future Planning couldn't work with the
13 Board?

14 A Right.

15 Q Why did you feel that way?

16 A I quoted it from a website.

17 Q Did you have --

18 A That's what a member of the committee said.

19 Q Did the member of the committee speak to you
20 about it as well?

21 A No.

22 Q In 2008, were you the liaison to the Future
23 Planning Committee?

24 A Yes.

25 Q If the Future Planning Committee wanted the

1 Board to take an action, would they discuss that with
2 their liaison?

3 A They would discuss it at their meeting and
4 then they would give me in writing what they wanted me
5 to bring to the Board.

6 Q You ever served on any clubs?

7 MR. DYE: Form.

8 THE DEPONENT: In the District?

9 BY MS. COWAN:

10 Q Yes.

11 A I belonged to Hobby at one time.

12 That's the only club I had time to belong to,
13 and then I dropped out of that.

14 Q What's your understanding of the difference
15 between the clubs and the committees?

16 A A club is a private -- an individual group of
17 people. Has nothing to do with the park.

18 Q And a committee?

19 A A committee has to do with the park, it's
20 either a standing or a Trustee committee.

21 Q During your time on the Board, did the Board
22 approve the formation of clubs?

23 A Yes.

24 Q Did the Board have the option of whether or
25 not to approve the formation of a club?