

**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.

**PLAINTIFFS' NOTICE OF INTENT TO RELY UPON
DOCUMENTS PREVIOUSLY FILED IN SUPPORT OF AND IN OPPOSITION TO
DEFENDANT JONES' AND TRAILER ESTATES PARK AND RECREATION
DISTRICT'S MOTIONS 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 items during the Court's consideration of Second Motion for Partial Summary Judgment filed by Defendant, Janet Jones and the Motion for Partial Summary Judgment filed by Defendant Salerno, both set for hearing on April 30, 2010, and for such other purposes permitted under the Florida Rules of Civil Procedure or Florida Law:

1. Exhibits labeled A through G filed by Joseph Salerno in Support of his Motion for Partial Summary Judgment, all filed on April 13, 2010, docket entries 836 through 839, 841, 842 and 844.

2. Janet Jones' Notice of Filing Documents in Support of Her Second Motion for Partial Summary Judgment, dated April 7, 2010, docket entry 833.

3. Janet Jones' Notice of Filing Documents in Support of Her Second Motion for Partial Summary Judgment and Memorandum of Law in Support dated March 24, 2010, docket entry 823.

4. Plaintiffs' 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, dated March 2, 2010, docket entry 778.

5. Plaintiffs' Notice of Filing Video Clips 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 dated March 2, 2010, docket entry 766.

6. Video Clips in Support of Plaintiffs' Opposition to Trailer Estates Park and Recreation District's Motion for Partial Summary Judgment, dated March 2, 2010, docket entry 752.

7. Plaintiffs' 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 Motion for Partial Summary Judgment, dated March 2, 2010, docket entry 727.

8. Plaintiffs' 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 Motion for Partial Summary Judgment, dated March 2, 2010, docket entry 711.

9. Video Clips in Support of Plaintiffs' Opposition to Motion for Partial Summary Judgment, dated March 2, 2010, docket entry 702.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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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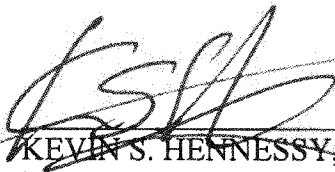
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Counsel for Plaintiffs

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 U.S. Mail, this 23rd day of April, 2010.



Handwritten signature of Kevin S. Hennessy in black ink, written over a horizontal line.

KEVIN S. HENNESSY, ESQUIRE