

**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.

AMENDED NOTICE OF CONTINUATION OF DEPOSITION DUCES TECUM
(Cancels the prior Notice for June 1, 2010)

PLEASE TAKE NOTICE that counsel for the Plaintiffs, MARY LOU SMITH and SHARON DENSON, will continue the deposition of the following:

NAME: Scott Rudacille, Esquire
DATE: May 19, 2010
TIME: 10:00 a.m.
PLACE: Kirk Pinkerton
(First Bank Building)
1301 6th Avenue West
Suite 401
Bradenton, Florida 34205

upon oral examination before a Court Reporter authorized by law in the State of Florida to take depositions. This oral examination will continue from day to day until completed. The

deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure.

The documents listed on Exhibit "A" attached hereto shall be brought to the deposition.

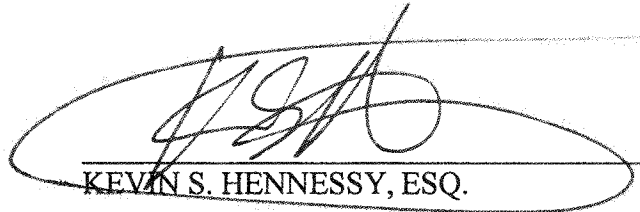
Respectfully Submitted,



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

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 and Zachary Ross, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *U.S. First Class Mail*, this 29th day of April, 2010.



KEVIN S. HENNESSY, ESQ.

cc: US Legal Support (via email)

EXHIBIT "A"

Any and all documentation in your possession that have not been previously produced in this matter, regarding Trailer Estates Park and Recreation District, including, but not limited to the following:

1. Any and all email or electronic communications involving you and:

1. T.J. Miller;
2. Martha Brauer;
3. John Vander Molen;
4. Janet Jones;
5. Mary Lou McNulty;
6. Joseph Salerno;
7. Gail Opper; and
8. Pamela Cole;

whether maintained in electronic or written format from January 1, 2006, to the present.

2. Any and all written legal opinions, rendered to the District by Kirk Pinkerton, Ruden McClosky, or other counsel to the District or District Board members.

3. Any and all notes, emails and documents related to any District Board meeting or District committee meeting you attended since April 1, 2010.

4. Invoices and billing records from March 2009, to the present to the District for legal services from Kirk Pinkerton.

5. Any and all documents (including but not limited to all notes, memos, recordings, or emails) whether in electronic or written format which discusses or mentions the existence of or action by the District's Executive Committee, Administrative Committee, and/or Executive Board.