

**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.

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**SECOND AMENDED NOTICE OF CONTINUATION OF DEPOSITION DUCES TECUM**

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

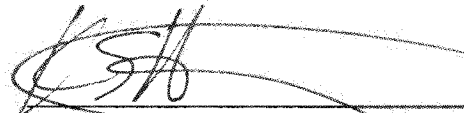
**NAME:** Scott Rudacille, Esquire  
**DATE:** June 21, 2010  
**TIME:** 9:00 a.m.  
**PLACE:** Kirk Pinkerton  
(First Bank Building)  
1301 6th Avenue West  
Suite 102  
Bradenton, Florida 34205

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 3<sup>rd</sup> 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 2<sup>o</sup><sup>th</sup> day of May, 2010.



KEVIN S. HENNESSY, ESQ.

cc: US Legal Support (via email)

**EXHIBIT "A"**

Any and all documentation in your possession that has 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 emails 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.