

**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' MOTION TO EXTEND DISCOVERY DEADLINE

COMES NOW, Plaintiffs MARY LOU SMITH and SHARON DENSON (hereinafter referred to as "Plaintiffs") by and through their undersigned counsel hereby file this Motion to Extend the time set for completion of discovery in this matter, and as grounds therefore state as follows:

1. The time set for the completion of discovery in this matter is September 3, 2010.
2. Plaintiffs' counsel wishes to take the deposition of Doris Waddell and has just recently made contact with the witness who has stated that she will be out of town from September 2, 2010 to September 7, 2010. Therefore, Plaintiffs' office contacted the parties to schedule her deposition for September 9, 2010 at 2:00 p.m.

3. The time and date set for this deposition was only objected to by counsel for the District.

4. Mrs. Waddell was employed for three years in the office at Trailer Estates Park and Recreation District.

5. Plaintiffs' counsel has recently learned that Mrs. Waddell has given a statement to counsel for Defendant, Trailer Estates Park and Recreation District.

6. Mrs. Waddell has been reluctant to speak to Plaintiffs' counsel informally.

7. The trial in this matter is still over 30 days away.

8. Plaintiffs' counsel affirms that this motion has not been filed for the purposes of delay and will not cause prejudice to any party.

WHEREFORE, the Plaintiffs respectfully request this Court extend the deadline for discovery in this matter until Friday, September 10, 2010, and grant such other and further relief as this Court deems to be reasonable and appropriate.



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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, **Kurt E. Lee, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *facsimile and U.S. Mail*, this 3rd day of September, 2010.


KEVIN S. HENNESSY, ESQ.