

**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.

NOTICE OF TAKING DEPOSITION DUCES TECUM

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

NAME: Doris Waddell
DATE: September 9, 2010
TIME: 2:00 PM
PLACE: Lewis, Longman & Walker, P.A.
1001 Third Avenue West
Suite 670
Bradenton, FL 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, **Kurt E. Lee, Esquire**, Kirk Pinkerton, P.A., 50 Central Avenue, Suite 700, Sarasota, FL 34236, by *facsimile*, this 3rd day of September, 2010.



KEVIN S. HENNESSY, ESQ.

EXHIBIT "A"

- 1) Copies of any written statements that you have given or that were prepared for you in this case by any party.
- 2) Any notes from meetings, draft meeting minutes or meeting minutes in your possession related to any Trailer Estates Park and Recreation District Board of Trustees meeting, Workshop, Executive Session, or any Trailer Estates Park and Recreation District Committee meetings.
- 3) Any documents, records, notes, correspondence or emails reflecting your observations of District Trustees, employees or committee members discussing or involved in the business, activities or events at Trailer Estates Park and Recreation District.
- 4) Any documents, notes, correspondence or emails reflecting any communications between you and Mary Lou Smith or Sharon Denson.