

IN THE CIRCUIT COURT OF THE FIRST
JUDICIAL CIRCUIT, IN AND FOR SANTA
ROSA COUNTY, FLORIDA

LEONARD J. ACCARDO and
LYNN M. ACCARDO,

Plaintiffs

CASE NO.: 06-1064-CA

v.

GREGORY S. BROWN, Property Appraiser
of Santa Rosa County, Florida; and
ROBERT J. McCLURE, Tax Collector
for Santa Rosa County, Florida

Defendants.

**DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS
FROM INDIVIDUAL PLAINTIFFS IDENTIFIED IN THE COMPLAINT**

Pursuant to Rule 1.350, Florida Rules of Civil Procedure, Defendant GREGORY S. BROWN, by and through his undersigned counsel, hereby propounds his Request for Production of Documents upon each Plaintiff identified in Schedule A of the Complaint and Amended Complaint, for inspection and/or copying at the offices of Messer, Caparello & Self, P.A., 2618 Centennial Place, Tallahassee, Florida 32317, within thirty (30) days of receipt of this request.

INSTRUCTIONS & DEFINITIONS

1. "Defendant" refers to GREGORY S. BROWN, Property Appraiser of Santa Rosa County, Florida, and all agents, representatives and other persons acting or purporting to act on Defendant's behalf.
2. Unless otherwise specified, "Plaintiff" or "you" or "your" refers to each Plaintiff identified in Schedule A of the Complaint and Amended Complaint.

3. The terms "identify" or "identity" have the following meanings:
 - a. With regard to natural persons, "identify" means to state the person's name, last known employment, home address, business address, and telephone number;
 - b. With regard to entities which are not natural persons, "identify" means to state the name of the entity, type of entity (e.g., corporation, partnership, limited partnership, etc.), state of organization, and principal place of business address;
 - c. With regard to documents, "identify" means to specify the type of document (e.g., lease, contract, memorandum, letter, notes, directive, etc.), the date and number of pages of the document, and to identify all author(s) and recipient(s) of the document and all persons and entities having possession or the right to possession of the original(s) and/or copies.
4. Unless otherwise specified, "person" means and includes every natural person, corporation, partnership or other entity.
5. "Date" means the exact day, month, and year, if ascertainable, and if not, the best approximation, including any relationship in time to the occurrence of other events identified in the interrogatory or response thereto.
6. "Complaint" means the original Complaint, as updated by any amendments thereto.
7. "Answer" means the Answer filed in response to the Complaint, as updated by any amended answers or answers to amended complaints.
8. "Document" as used in these requests as the meaning set forth in Rule 1.350, Florida Rules of Civil Procedure, and also includes without limitation, all tangible things, whether handwritten, typed, printed or otherwise visually reproduced, taped, photographic or graphic matter, however produced or reproduced, originals, copies and drafts, including but not limited to any leases, subleases, applications, contracts, letters, notices, cables, wires, email, memoranda, interoffice or

personal communications, telegrams, handbooks, manuals, reports, periodicals, notes (including any made during the review or preparation of work papers), statements, forecasts, summaries or transcripts of any telephone conversation or personal conversation or interview, work papers, diaries (formal or informal), business or personal calendars, personal files and notes, sketches, charts, assignments, agreements (including any modification or revision thereof), summaries of negotiations, press releases, photographs, motion pictures, computer inputs or outputs, microfilm, work assignments and any other writing including drafts, revisions or translations of any of the foregoing, within the possession or custody or under control of the Plaintiff or any agent or family member of the Plaintiff.

9. The "Subject Property" is defined to be the real property assessed with respect to each individual Plaintiff.

10. If you cannot produce any document requested, after exercising due diligence to secure the information to do so, then explicitly so state. In answering each request, you are to provide all information known or available to you or to your agent(s) or attorney(s).

11. In the event that you assert the application of a legal privilege, please identify the author, addressee and date of such document and a general description thereof.

REQUESTS FOR PRODUCTION

Please produce:

1. Any and all documents or materials identified or referred to in response to the Defendant GREGORY S. BROWN'S First Set of Interrogatories, which was submitted contemporaneously herewith, including but not limited to declarations of condominium, leases, subleases, assignments, closing documents, purchase agreements, mortgage documents or other documents through which you have attained rights or interests in the Subject Property.

2. Any and all portions of federal income tax returns or schedules, reflecting income, credits and/or deductions attributable to the Subject Property.

3. Any and all state intangible tax returns reflecting the Subject Property.

It is requested that the above production be made in accordance with the Florida Rules of Civil Procedure. Inspection is to be made by visual observation, examination, and/or copying.

Respectfully submitted,



ROY V. ANDREWS

Lindsay, Andrews, & Leonard, P.A.

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Counsel for Property Appraiser

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to: Danny L. Kepner, Esq. and Thomas J. Gilliam, Jr., Esq., Shell, Fleming, Davis & Menge, P.A., 226 South Palafox Street, 9th Floor, Pensacola, FL 32502 this 23 day of August, 2007.



THOMAS M. FINDLEY