

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA

JOHN BARNER, ET AL.,

Plaintiffs,

CASE NO. 2010 CA 5791 NC

vs.

THE LANDINGS MANAGEMENT  
ASSOCIATION, INC., a Florida  
corporation,

Defendant.

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INTERROGATORIES TO DEFENDANT

Pursuant to the Florida Rules of Civil Procedure, Defendant, THE LANDINGS MANAGEMENT ASSOCIATION, is required to answer, separately and fully, in writing and under oath, within thirty (30) days after service hereof, the following Interrogatories:

- (a) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the Complaint;
- (b) Where the name or identity of a person, or persons, is required, please state full name, present and/or last known home and business or employment address;
- (c) Where knowledge or information or possession of a party, or parties is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys;
- (d) The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the persons mentioned in clause (c);
- (e) If the party to whom these interrogatories are addressed is a corporation, the answers must be signed by an officer or agent duly authorized to bind it;

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(f) The term "person" or "individual" includes any natural or artificial person, corporation, partnership, joint venture, business trust, professional association or sole proprietorship;

(g) The term "documents" includes recorded, written or graphic material and objects of any kind, and all copies containing any additional matter, however produced or reproduced, of any kind and description, including but not limited to:

- i) Letters, correspondence, telegrams and mailgrams;
- ii) Paper, books, periodicals, pamphlets, brochures and promotional materials;
- iii) Accounts, loan records and financial records;
- iv) Photographs, films, microfilms, video recordings and sound recordings;
- v) Notes, memoranda, inter-office communications and records.

(h) Where you are asked to identify a document, state the title, date, any identifying numbers and all other identifying designations, and the number of pages.

## INTERROGATORIES

1. Please identify all persons believed to have knowledge concerning the disputed issues in this action and for each such person, state their name, address and telephone number if known to Defendant and a short summary of what knowledge and information said person is believed to have concerning the disputed issues in this matter.

2. Describe each and every instance where Plaintiffs "have consistently acknowledged that Tract F is a common area within The Landings" as alleged in paragraph 19 of your Counterclaim.

Dated: \_\_\_\_\_

THE LANDINGS MANAGEMENT  
ASSOCIATION, INC.

BY: \_\_\_\_\_  
ITS:

STATE OF FLORIDA  
COUNTY OF SARASOTA

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 2010  
by \_\_\_\_\_, as \_\_\_\_\_ of THE LANDINGS  
MANAGEMENT ASSOCIATION, INC., who is personally known to me or who has produced \_\_\_\_\_  
\_\_\_\_\_ as identification and who did take an oath.

\_\_\_\_\_  
NOTARY PUBLIC

Print Name: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_

(Seal)