

IN THE CIRCUIT COURT FOURTH  
JUDICIAL CIRCUIT IN AND FOR  
DUVAL COUNTY, FLORIDA

CASE NO. 2015-CA-1413

Division: CV-B

LARUE AND LORI ELLIS,  
Husband and wife;

Plaintiffs,

v.

THE CITY OF JACKSONVILLE,  
et al.,

Defendants.

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**DEFENDANT CITY OF JACKSONVILLE'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS**

Defendant, CITY OF JACKSONVILLE (hereinafter "City"), through undersigned counsel, pursuant to Rules 1.280 and 1.350, Fla. R. Civ. P., requests that the following documents be produced by all named Plaintiffs in this action, to Jason R. Teal, General Counsel, 117 W. Duval Street, Suite 480, Jacksonville, Florida 32202, within thirty (30) days from the date of service of this request or such shorter time as ordered by the Court. City also requests that Plaintiff serve a written response pursuant to Rule 1.350, Florida Rules of Civil Procedure.

**DEFINITIONS**

1. "Plaintiff" refers to the individuals listed as plaintiffs in Case No. 2015-CA-001413 in the Fourth Judicial Circuit in and for Duval County.

2. "Documents" shall have the meaning stated in Rule 1.350, Florida Rules of Civil Procedure, and includes, without limitation, all letters, correspondence, memoranda, notes, records, contracts, agreements, permits, plans, work papers, tapes, charts, books, ledgers, invoices,

receipts, logs, drawings, films, videos, motion pictures, photographs, and all other written, printed, typed, recorded, transcribed, punched, taped, filmed, or graphic matter of any kind or nature, including all drafts, copies, or reproductions thereof.

3. "Person" shall mean any individual, corporation, professional corporation, partnership, proprietorship, joint venture, association, firm, governmental body, or other institution or entity, however organized.

4. "Related to" shall mean to constitute, embody, reflect, pertain, support, contradict, or comment upon.

5. "You," "your," or "yours" shall refer to each individual Plaintiff and to documents in his and her possession and in the possession of his and her agents, investigators or attorneys.

6. "All" includes the word "any," and "any" includes the word "all."

7. "COJ" or "City" means City of Jacksonville, as well as its agents, representatives, attorneys, and accountants.

8. "Property" means the property commonly identified by street address 2194 San Pablo Road South or 2194 South San Pablo Road or identified by Duval County Real Estate Parcel number 167132-0150.

### **Instructions**

1. In order to give the broadest interpretation and to include the most documents possible within the scope of this request, any word written in the singular shall be deemed to include the plural and vice versa; the masculine shall be deemed to include the feminine and vice versa; the disjunctive "or" shall be deemed to include the conjunctive "and" and vice versa; and the words "each," "every," "any," and "all" shall be deemed to include each of the other words.

2. Unless otherwise indicated by the request, the time frame for the request is from

date the Subject Property was acquired by you.

3. You are instructed to produce documents under your custody, possession, or control (whether or not currently in your possession) in electronic format, if electronic copies are available.

4. If you object to any part of this request for production, please respond to the part to which you do not object. As to each part to which you object, please set forth the specific basis for the objection, and for any document requested herein that you withhold production on the basis of a claim of privilege or other exemption from discovery, furnish a list giving the following information: (i) type of document; (ii) name(s) of author and/or sender; (iii) name(s) of recipient and anyone copied; (iv) date of origin, if not dated, the date transmitted or received; (v) subject matter; (vi) basis for claimed privilege.

#### **REQUEST**

1. A copy of any professional licenses held by Plaintiffs from 2008 to date.

2. A copy of any continuing education coursework completed by Plaintiffs related to the licenses identified in Item #1 from 2008 to date, including but not limited to course descriptions, outlines or handouts provided by the program.

3. A copy of all designs/plans/drawings related to the construction of the building(s) on the Property, including any engineering required for the construction of the foundation.

4. A copy of all designs/plans/drawings related to the construction of the driveway on the Property, including any engineering required for the construction of the same.

5. A copy of all designs/plans/drawings related to the construction of the bulkhead/retaining wall on the Property, including any engineering required for the construction of the same.

6. A copy of all invoices and receipts for the purchase of materials/supplies involved

in the construction of the driveway on the Property.

7. A copy of all invoices and receipts for the payment of labor involved in the construction of the driveway on the Property.

8. A copy of all invoices and receipts for the purchase of materials involved in the construction of the bulkhead/retaining wall on the Property.

9. A copy of all invoices and receipts for the payment of labor involved in the construction of the bulkhead/retaining wall on the Property.

10. A copy of any rejected designs/plans/drawings related to the construction, design, or engineering of the building(s), driveway or the bulkhead/retaining wall on the Property.

11. A copy of all documents from anyone consulted or evaluated the Property prior to, during or after the construction of the bulkhead/retaining wall or anyone involved in the assessment of the Property.

12. A copy of all contracts or other documents pertaining to the design, engineering, or construction of the building(s), driveway, grounds or bulkhead/retaining wall on the Property.

13. A copy of all settlement agreements, waivers or releases between Plaintiffs and anyone involved in the design, engineering, or construction of the bulkhead/retaining wall on the Property.

14. A copy of any insurance policy or bond which provides coverage for the Property.

15. A copy of the insurance policy or bond information for any person or entity that provided services on the Property.

Respectfully submitted,

**OFFICE OF GENERAL COUNSEL**

*/s/ Jason R. Teal* \_\_\_\_\_

Jason R. Teal

General Counsel

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*Counsel for Defendant, City of Jacksonville*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 7th day of December, 2021, a true and correct copy of the foregoing was distributed to all parties by filing and service via the e-Portal to all attorney(s)/interested parties identified on the e-Portal Electronic Service List.

*/s/ Jason R. Teal*

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Jason R. Teal  
General Counsel