

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

CIRCUIT CIVIL DIVISION: "AF"

CASE NO.: 502023CA015733XXXAMB

BETH SAFFER, et. al.;

Plaintiffs,

v.

SANDRA KLIMAS, et. al.;

Defendants.

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**PLAINTIFFS' RESPONSES TO DEFENDANT ANTHONY  
DiGENNARO'S FIRST SET OF REQUESTS FOR PRODUCTION TO PLAINTIFFS**

COMES NOW the Plaintiffs, BETH SAFFER and ARTHUR ROBINS, individually and on behalf of others similarly situated, by and through their undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.350, serves their responses to Defendant Anthony DiGennaro's ("Defendant") First Set of Requests for Production Directed Towards Plaintiffs ("Request"):

**PRELIMINARY STATEMENT**

With respect to the definitional and instructional sections of Defendant's Requests -- both as to the language contained within those sections (in and of themselves) and also as those sections are reasonably interpreted in accordance with the individual Requests made thereafter by Defendant -- Plaintiffs respond, reserves their rights, objects and states as follows:

1. Plaintiffs' investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are

not a waiver of, Plaintiffs' right to rely on other facts or documents at trial beyond those identified herein and/or produced hereafter.

2. By making the accompanying responses and objections to Defendant's Requests, Plaintiffs do not waive, and hereby expressly reserve, their right to assert any and all objections as to the admissibility of such responses and/or documents into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, Plaintiffs make the responses and objections herein without in any way implying that they considers the Requests and responses to the Requests to be relevant or material to the subject matter of this action.

3. A response to a particular Request interposing objections and/or suggesting that related documents will or might be produced shall not be deemed or construed that there are, in fact, responsive documents, that Plaintiffs performed any of the acts described or inferred in or with respect to that Requests, or definitions and/or instructions applicable to the Requests, or that Plaintiffs acquiesces in the characterization of the conduct or activities contained or inferred in that Requests, or in the definitions and/or instructions applicable to the Requests.

4. Plaintiffs expressly reserve the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s), as well as the right to produce documents responsive to the Requests as a superseding response thereto, and/or on a rolling basis as those documents become reasonably available to Plaintiffs or for other reasons permitted by law.

5. Plaintiffs object to each instruction, definition, and individual Requests to the extent that it seeks information or documents protected from disclosure by the attorney-client privilege, attorney work product doctrine, or any other applicable privilege inasmuch as a

significant portion of Defendant's Requests either directly or indirectly calls for the ultimate production (a) of information shared between Plaintiffs and their counsel of record, (b) of information that was prepared by Plaintiffs' counsel of record in this matter or is otherwise utilized by counsel with respect to counsel's preparation of their case and (c) of associated or related information protected from disclosure under applicable law. Furthermore, Plaintiffs shall not intentionally produce any attorney client privileged or attorney work product information, and accordingly all objections thereto are automatically preserved under controlling Florida law regardless of the content of any response to the Defendants' document requests. *See, e.g., Truly Nolen Exterminating v. Thomasson*, 554 So. 2d 5 (Fla. Dist. Ct. App. 1989) ("A failure to assert a work-product privilege at the earliest opportunity, in response to a discovery motion, does not constitute a waiver of the privilege so long as the privilege is asserted by a pleading, to the trial court, before there has been an actual disclosure of the information alleged to be protected"). Nevertheless, should any disclosure by Plaintiffs of attorney-client or attorney work product materials occur, it is inadvertent and shall not constitute a waiver of any privilege.

6. Plaintiffs neither consent to nor agree with Defendant's characterization of the applicable statutory provisions and related judicial requirements of responding to and producing documents in this matter. Where Defendant's characterizations of the rules applicable to document productions in this jurisdiction are in error, in whole or part, Plaintiffs shall ignore -- in *toto* -- Defendant's instructions and shall instead comply with the law and with this Court's local rules as well as all applicable orders.

7. Plaintiffs further object to each instruction, definition, and individual request within the Requests as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Defendant from Defendant's own files, from

documents or information in Defendant's possession, or from documents or information that Defendant previously produced or may be required to produce to Plaintiffs. Responding to such requests would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests is substantially the same or less for Defendant as for Plaintiff. To the extent documents or information are withheld on the basis of this objection, Plaintiff will so inform Defendant; but Plaintiffs state unequivocally that many of the categories in the Requests are uniquely and substantially within the knowledge and possession of the Defendant.

8. To the extent any of Defendant's individual requests seek documents or information that include expert material or data, including but not limited to survey, technical and evaluative information appertaining or relating to expert witness testimony in this matter, Plaintiffs object to any such requests as premature and expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert additional objections or privileges, in one or more subsequent supplemental response(s) in accordance with the time period for exchanging expert reports set by the Court or in accordance with applicable under law.

9. Plaintiffs have and are continuing to investigate and conduct formal and informal discovery regarding the acts and omissions set forth in the Complaint in this matter. If, through the foregoing investigation, through formal and informal discovery, or otherwise, Plaintiffs obtain possession, custody or control of documents or information responsive to Defendant's Requests, Plaintiffs shall produce said documents as they become available.

10. Plaintiffs object to the duplicative and burdensome nature of the individual requests contained within Defendant's Requests.

Plaintiffs incorporate by reference every general objection to the overall form and content of the Requests as set forth above into each specific response set forth below. A specific response may repeat a general objection for emphasis or some other reason. The failure to include the foregoing general statements in any specific response does not waive any general objection to that request or any rights Plaintiffs have, directly or indirectly. Moreover, Plaintiffs do not waive their right to amend their responses.

### **RESPONSES TO REQUESTS FOR PRODUCTION**

#### **DOCUMENT REQUEST NO. 1:**

*Any and all documents that support your general allegation that Anthony DiGennaro committed theft of money held for the benefit of Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

#### **RESPONSE TO DOCUMENT REQUEST NO. 1:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has

reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 2:**

*Any and all documents that support your general allegation that Anthony DiGennaro committed theft of money held for the benefit of Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 2:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that

the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 3:**

*Any and all documents that support your general allegation that Anthony DiGennaro committed theft of money held for the benefit of Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 3:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).



- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 4:**

***Any and all documents that support your general allegation that Anthony DiGennaro misused funds held for the benefit of Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 4:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 5:**

*Any and all documents that support your general allegation that Anthony DiGennaro misused funds held for the benefit of Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 5:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 6:**

***Any and all documents that support your general allegation that Anthony DiGennaro misused funds held for the benefit of Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 6:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 7:**

*Any and all documents that support your general allegation that Anthony DiGennaro has hid, or is currently hiding, prior and ongoing mismanagement and malfeasance that impacted Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 7:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
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- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 8:**

***Any and all documents that support your general allegation that Anthony DiGennaro has hid, or is currently hiding, prior and ongoing mismanagement and malfeasance that impacted Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 8:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.



- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 9:**

*Any and all documents that support your general allegation that Anthony DiGennaro has hid, or is currently hiding, prior and ongoing mismanagement and malfeasance that impacted Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 9:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 10:**

*Any and all documents that support your general allegation that Anthony DiGennaro has imposed any illegal or unlawful assessments that impacted Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 10:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 11:**

*Any and all documents that support your general allegation that Anthony DiGennaro has imposed any illegal or unlawful assessments that impacted Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 11:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 12:**

***Any and all documents that support your general allegation that Anthony DiGennaro has imposed any illegal or unlawful assessments that impacted Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 12:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 13:**

*Any and all documents that support your general allegation that individuals within the Palm Greens community are having to "liquidate" their homes.*

**RESPONSE TO DOCUMENT REQUEST NO. 13:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 14:**

*Any and all documents that support your general allegation that Anthony DiGennaro has engaged in "malfeasance."*

**RESPONSE TO DOCUMENT REQUEST NO. 14:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes



the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 15:**

*Any and all documents that support your general allegation that Anthony DiGennaro has, or is in the process of, appropriating millions of dollars of assets that impact Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 15:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 16:**

*Any and all documents that support your general allegation that Anthony DiGennaro has, or is in the process of, appropriating millions of dollars of assets that impact Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 16:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 17:**

*Any and all documents that support your general allegation that Anthony DiGennaro has, or is in the process of, appropriating millions of dollars of assets that impact Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 17:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 18:**

*Any and all documents that support your general allegation that Anthony DiGennaro has, or is in the process of, appropriating millions of dollars of assets that impact Plaintiffs and the putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 18:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 19:**

*Any and all documents that support your general allegations that Anthony DiGennaro has engaged in threatening behavior towards Plaintiffs or any putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 19:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).



- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 20:**

***Any and all documents that support your general allegations that Anthony DiGennaro has acted maliciously towards Plaintiffs or any putative class members.***

**RESPONSE TO DOCUMENT REQUEST NO. 20:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 21:**

*Any and all documents that support your general allegations that Anthony DiGennaro has taken any action to attempt and relinquish the legal rights held by Plaintiffs and/or any putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 21:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 22:**

*Any and all email correspondences that have been sent by Anthony DiGennaro.*

**RESPONSE TO DOCUMENT REQUEST NO. 22:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs

obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party, as it calls for the production of documents authored by the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 23:**

***Any and all documents that support your general allegation that the November 16, 2023 meeting held by the Number 2 Condominium Association – Palm Greens at Villa Del***

***Ray, Inc. Board of Directors was held violation of any relevant Governing Documents or Florida Statutes.***

**RESPONSE TO DOCUMENT REQUEST NO. 23:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already

well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 24:**

*Any and all documents supporting your general allegation that Anthony DiGennaro has stifled and/or prevented Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc. from initiating a lawsuit against Lennar Homes.*

**RESPONSE TO DOCUMENT REQUEST NO. 24:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has

reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 25:**

***Any and all documents supporting your general allegation that Anthony DiGennaro has stifled and/or prevented Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc. from initiating a lawsuit against Lennar Homes.***

**RESPONSE TO DOCUMENT REQUEST NO. 25:**



- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that

the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 26:**

*Any and all documents supporting your general allegation that Anthony DiGennaro has stifled and/or prevented Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 26:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 27:**

*Any and all documents supporting your general allegation that the property values in the Palm Greens Community have depreciated.*

**RESPONSE TO DOCUMENT REQUEST NO. 27:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 28:**

*Any and all documents supporting your general allegations that Anthony DiGennaro has caused the property values in the Palm Greens Community to depreciate.*

**RESPONSE TO DOCUMENT REQUEST NO. 28:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 29:**

*Any and all invoices that you believe had been fraudulently created that have been paid by the Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 29:**

- Plaintiffs object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to

believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

**DOCUMENT REQUEST NO. 30:**

*Any and all invoices that you believe had been fraudulently created that have been paid by the Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 30:**

- Plaintiffs object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

**DOCUMENT REQUEST NO. 31:**

*Any and all invoices that you believe had been fraudulently created that have been paid by the Palm Greens at Villa Del Ray Recreation Condominium Association, Inc..*

**RESPONSE TO DOCUMENT REQUEST NO. 31:**

- Plaintiffs object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.



- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

**DOCUMENT REQUEST NO. 32:**

*Any and all documents supporting your general allegation that Anthony DiGennaro was involved in the preparation or payment of phony/fraudulent invoices submitted to Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 32:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has

reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 33:**

*Any and all documents supporting your general allegation that Anthony DiGennaro was involved in the preparation or payment of phony/fraudulent invoices submitted to Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 33:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that

the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 34:**

*Any and all documents supporting your general allegation that Anthony DiGennaro was involved in the preparation or payment of phony/fraudulent invoices submitted to Palm Greens at Villa Del Ray Recreation Condominium Association, Inc. [sic]*

**RESPONSE TO DOCUMENT REQUEST NO. 34:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 35:**

*Any and all financial opinions supporting your general allegation that Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc. will need to double its annual assessments in the future.*

**RESPONSE TO DOCUMENT REQUEST NO. 35:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 36:**

*Any and all documents supporting your general allegation that Anthony DiGennaro is involved in a civil conspiracy.*

**RESPONSE TO DOCUMENT REQUEST NO. 36:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 37:**

***Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control of more than \$500,000.00 in funds that is meant for the benefit of Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 37:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes



the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 38:**

*Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control of more than \$500,000.00 in funds that is meant for the benefit of Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 38:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 39:**

***Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control of more than \$500,000.00 in funds that is meant for the benefit of Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 39:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 40:**

*Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control of more than \$500,000.00 in funds that is meant for the benefit of Plaintiffs and/or the putative class members. [sic]*

**RESPONSE TO DOCUMENT REQUEST NO. 40:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 41:**

***Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control parcels of real estate meant for the benefit of Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 41:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 42:**

*Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control parcels of real estate meant for the benefit of Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 42:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).



- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 43:**

***Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control parcels of real estate meant for the benefit of Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.***

**RESPONSE TO DOCUMENT REQUEST NO. 43:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 44:**

*Any and all documents supporting your general allegation that Anthony DiGennaro is illegally asserting control parcels of real estate meant for the benefit of Plaintiffs and/or the putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 44:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 45:**

*Any and all documents supporting your general allegation that Anthony DiGennaro owed a fiduciary duty to Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 45:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 46:**

*Any and all documents supporting your general allegation that Anthony DiGennaro owed a fiduciary duty to Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 46:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 47:**

*Any and all documents supporting your general allegation that Anthony DiGennaro has secretly forced votes and compliance from entities she does not control to harm Plaintiffs and/or putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 47:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.



- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 48:**

*Any and all documents supporting your general allegation that Lennar Homes is violating its development agreement.*

**RESPONSE TO DOCUMENT REQUEST NO. 48:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 49:**

*Any and all documents supporting your general allegation that Anthony DiGennaro has an ongoing policy or practice to squeeze elderly citizens out of their house.*

**RESPONSE TO DOCUMENT REQUEST NO. 49:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 50:**

*Any and all documents supporting your general allegation that Anthony DiGennaro has violated Florida's Deceptive and Unfair Trade Practices Act.*

**RESPONSE TO DOCUMENT REQUEST NO. 50:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 51:**

*Any and all documents supporting the general allegation that Plaintiffs have suffered any damages as a result of any action or inaction by Anthony DiGennaro.*

**RESPONSE TO DOCUMENT REQUEST NO. 51:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 52:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has been unjustly enriched.*

**RESPONSE TO DOCUMENT REQUEST NO. 52:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 53:**

***Any and all documents supporting the general allegation that Anthony DiGennaro has intentionally concealed material facts from Plaintiffs and/or putative class members.***

**RESPONSE TO DOCUMENT REQUEST NO. 53:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes



the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 54:**

*Any and all written statements authored by Anthony DiGennaro concerning the subject matter of this Litigation.*

**RESPONSE TO DOCUMENT REQUEST NO. 54:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 55:**

*Any and all documents supporting the general allegation that Anthony DiGennaro stripped title to more than \$1,000,000.00 worth of property held by the benefit of Plaintiffs and/or putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 55:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes

the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 56:**

*Any and all secret proxies, as generally alleged in this Litigation.*

**RESPONSE TO DOCUMENT REQUEST NO. 56:**

- Plaintiffs object to this request on the basis that the phrase "generally alleged" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "generally alleged," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.

- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 57:**

*Any and all documents support the general allegation that Anthony DiGennaro has caused Plaintiff's and the putative class members' legal rights to be waived or otherwise compromised.*

**RESPONSE TO DOCUMENT REQUEST NO. 57:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.

- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended

to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 58:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has caused Number 1 Condominium Association – Palm Greens at Villa Del Ray, Inc. to suffer any damages.*

**RESPONSE TO DOCUMENT REQUEST NO. 58:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of



the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 59:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has caused Number 2 Condominium Association – Palm Greens at Villa Del Ray, Inc. to suffer any damages.*

**RESPONSE TO DOCUMENT REQUEST NO. 59:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.

- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 60:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has caused Palm Greens at Villa Del Ray Recreation Condominium Association, Inc.*

**RESPONSE TO DOCUMENT REQUEST NO. 60:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already

well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 61:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has caused Plaintiffs to suffer any damages.*

**RESPONSE TO DOCUMENT REQUEST NO. 61:**

- Plaintiffs object to this request on the basis that the phrase "general allegation" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "general allegation," and that the so-called "general allegation" mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has

reason to believe they exist and to date, have been withheld from production by the requesting party).

- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 62:**

*Any and all documents supporting the general allegation that Anthony DiGennaro has caused the putative class members Plaintiffs purport to represent to suffer any damages.*

**RESPONSE TO DOCUMENT REQUEST NO. 62:**

- Plaintiffs object to this request on the basis that the phrase “general allegation” is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase “general allegation,” and that the so-called “general allegation” mischaracterizes the nature of claims made in the operative complaint on file herein and therefore comprises a part of a document request outside the scope of discovery in this action.
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object on the basis that the request calls for the production of documents that Plaintiffs believe to be relevant but withheld by the requesting party. Plaintiffs obviously cannot produce documents not in their possession, custody, or control (but has reason to believe they exist and to date, have been withheld from production by the requesting party).
- Plaintiffs further object to this request on the ground that it is burdensome, oppressive, and harassing because it calls for the production of documents equally or more easily available to the requesting party.
- Plaintiffs further object to this request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiffs, because it is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiffs should be compelled to provide. This request is so obviously calculated to (1) engage in a frivolous fishing expedition about matters already well known to the parties and (2) engage the Plaintiffs in speculation regarding matters (particularly documents in the possession, custody, or control of the requesting party) that

the requesting party is actively withholding from Plaintiffs, such that any response would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 63:**

*Any and all draft versions of e-mail blasts sent by the Palm Greens at Villa Del Ray Recreation Condominium Association, Inc. since July 1, 2023.*

**RESPONSE TO DOCUMENT REQUEST NO. 63:**

- Plaintiffs object to this request on the basis that the phrase "e-mail blasts" is vague, ambiguous and unintelligible as to what the requesting party means by their undefined phrase "e-mail blasts."
- Plaintiffs further object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.
- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably

calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 64:**

*Any and all e-mail correspondences with any persons discussing prospective e-mail blasts sent by Palm Greens at Villa Del Ray Recreation Condominium Association, Inc. concerning this litigation.*

**RESPONSE TO DOCUMENT REQUEST NO. 64:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive.
- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.
- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably



calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 65:**

*Any and all correspondence between Arthur Robins and Mitchal J. Stein.*

**RESPONSE TO DOCUMENT REQUEST NO. 65:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive and calls for obviously irrelevant documents or documents not reasonably calculated to admissible evidence.
- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.
- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress

Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 66:**

*Any and all correspondence between Beth Shaffer and Mitchal J. Stein.*

**RESPONSE TO DOCUMENT REQUEST NO. 66:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive and calls for obviously irrelevant documents or documents not reasonably calculated to admissible evidence.
- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.

- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.
- Plaintiffs object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 67:**

*Any and all correspondence between Plaintiffs and putative class members.*

**RESPONSE TO DOCUMENT REQUEST NO. 67:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive and calls for obviously irrelevant documents or documents not reasonably calculated to admissible evidence.
- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any

party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.

- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 68:**

*Any and all correspondence authored by Plaintiffs concerning Anthony DiGennaro.*

**RESPONSE TO DOCUMENT REQUEST NO. 68:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive and calls for obviously irrelevant documents or documents not reasonably calculated to admissible evidence.

- Plaintiffs further object to this request on the ground that it asks for information that is outside the scope of discovery because it is not relevant to the claim or defense of any party and calls for the production of documents that are not reasonably calculated to lead to the discovery of admissible evidence.
- Plaintiff further objects to providing any substantive response and/or production to this Request on the basis that it is oppressive, harassing, and obviously intended to oppress Plaintiff, because its scope is neither proportional to the needs of the case nor reasonably calculated to result in the discovery of relevant or potentially relevant information that Plaintiff should be compelled to provide. This Request calls for a significant amount of documents so obviously irrelevant to the case, and so obviously calculated to engage in a fishing expedition about matters having nothing to do with any portion of this fraud and breach of fiduciary duty case, such that any production without limitation would be particularly burdensome, oppressive and wrongful.
- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

**DOCUMENT REQUEST NO. 69:**

*Any and all correspondence authored by Plaintiffs concerning this Lawsuit.*

**RESPONSE TO DOCUMENT REQUEST NO. 69:**

- Plaintiffs object to this request on the basis that it is burdensome and oppressive because it lacks specificity sufficient for Plaintiff to determine which documents are responsive

and calls for obviously irrelevant documents or documents not reasonably calculated to admissible evidence.

- Plaintiffs further object to this request to the extent it calls for production of documents protected from disclosure pursuant to the attorney client privilege, the work product privilege and other similar privileges designed to stop revelation of information intended to be shared with a party's attorney or otherwise reflective of the strategies involved in every attorney client relationship.

NOT A CERTIFIED COPY

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via e-mail, which will deliver electronic copies of this filing to the designated e-mail addresses for counsel of record pursuant to Fla. R. Jud. Admin. 2.516, and we also certify a true and correct copy of the foregoing was furnished via e-mail, on this 9th day of March, 2024, to: KEVIN J. FRANCHI, ESQ., and LABEED A. CHOUDRY, ESQ., Kaufman Dolowich, LLP, Attorneys for Defendants, 100 SE 3rd Avenue, Suite 1500, Ft. Lauderdale, FL 33301. [kjfranchi@kaufmandolowich.com](mailto:kjfranchi@kaufmandolowich.com); [lbell@kaufmandolowich.com](mailto:lbell@kaufmandolowich.com); [lchoudhry@kaufmandolowich.com](mailto:lchoudhry@kaufmandolowich.com); [sfranchi@kaufmandolowich.com](mailto:sfranchi@kaufmandolowich.com)).

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