

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, FLORIDA

CASE NO. 2024CA001411CAAXWS

ADAM T. BLACK and
BRITTANY N. BLACK,

Petitioners,

v.

STARKEY RANCH MASTER PROPERTY
OWNER'S ASSOCIATION, INC., a Florida
corporation

Respondent.

**DEFENDANT'S RESPONSES TO PLAINTIFFS'
FIRST REQUEST FOR PRODUCTION**

Defendant, STARKEY RANCH PROPERTY OWNER'S ASSOCIATION, INC. (the "ASSOCIATION"), pursuant to Florida Rule of Civil Procedure 1.350, hereby files and serves its responses to Plaintiffs' First Request for Production of Documents, served on November 26, 2024, as follows:

GENERAL OBJECTIONS

1. Defendant's objections are made expressly subject to, and without waiver of any objections to competency, relevancy, materiality, privilege, or admissibility of any of the Responses given herein, or of the subject matter thereof, in any proceeding. The objections are also made subject to Defendant's right to object to any further discovery involving or relating to the subject matter of the Requests.

2. Defendant objects to any Request that seeks disclosure of documents that are matters of public record or easily obtainable from another source, for which the burden of

production on Plaintiffs is equal to that of the Defendant. Any such Request will be viewed as harassing, and Plaintiffs and their counsel are directed to seek production of the requested documents from the appropriate public records or other sources.

3. These objections and limitations are incorporated by reference into each of the Responses set forth below. The assertion of the same, similar or additional objections in Defendant's Specific Responses to individual Requests, or the failure to assert any additional objections to a particular Request, does not waive any of Defendant's objections set forth in this section or the following sections.

4. Defendant reserves its rights to introduce trial evidence that is determined to be needed at a later time, including but not limited to, documents not yet in the Defendant's possession.

RESPONSES TO REQUEST FOR PRODUCTION

1. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the exterior modification subject of these proceedings.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

2. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the December 8, 2023, meeting of the Starkey Ranch Architectural Review Board ("ARB").

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

3. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the December 22, 2023, meeting of the Starkey Ranch ARB.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

4. Any and all documents, records, plans, applications, notes, reports, logs, memoranda and communications, including photos and videos, between Defendant and any Starkey Ranch owner(s), other than Plaintiff, from January, 2020 to present, which pertain or relate to a request for architectural review of a proposed or existing exterior modification relating to composite roofs and/or insulated aluminum roof panels.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

5. Any and all documents, records, plans, applications, notes, reports, logs, memoranda and communications, including photos and videos, between Defendant and any Starkey Ranch owner(s), other than Plaintiff, from January 7, 2020 to present, which allege an exterior modification violation pertaining or relating to composite roofs and/or insulated aluminum roof panels.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

6. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the November 9, 2023, "1stNOTICE" Plaintiff received from Defendant, a copy of which was attached to the Amended Petition as Exhibit "B".

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

7. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the February 14, 2024, "2nd" FINAL NOTICE" Plaintiff received from Defendant, a copy of which was attached to the Amended Petition as Exhibit "D".

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

8. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to the April 1, 2024, "FINING COMMITTEE RESPONSE" Plaintiff received from Defendant, a copy of which was attached to the Amended Petition as Exhibit "E".

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

9. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to Plaintiff's April 12, 2024, request for variance.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

10. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to exterior modifications at 2588 Murray Pass, Odessa, Florida 33556.

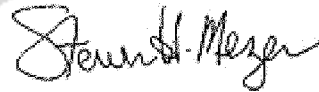
Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

11. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to exterior modifications at 3335 Forsythia Drive, Odessa, Florida 33556.

Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.

12. Any and all documents, records, notes, reports, logs, memoranda and communications, including photos and videos, pertaining or relating to exterior modifications at 3764 Stansil Avenue, Odessa, Florida 33556.

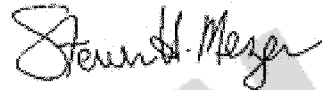
Response: All documents that are in the Association's possession, will be made available for inspection at a mutually agreeable, date and place.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that pursuant to Fla. R. Gen. Prac. & Jud. Admin 2.516(b)(1), a true and correct copy of the foregoing was electronically filed with the Clerk of Court via the Florida Courts E-Filing Portal on this 26th day of December 2024, which sends a copy via email to all counsel of record in the above-captioned matter, including: Christopher S. Furlong, Esq., BACON, BACON & FURLONG, P.A., *Attorneys for Petitioners*, 2959 First Avenue North, St. Petersburg, FL 33713, chris@baconandbacon.com.



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UNOFFICIAL
DOCUMENT