

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

MICHAEL T FLYNN,
Plaintiff,

v.

CASE NO. 2023 CA 004264 NC
DIVISION C CIRCUIT

JIM STEWARTSON,
RICK WILSON,
MEIDASTOUCH LLC,
Defendant.

**ORDER FINALIZING
ORDER GRANTING IN PART
PLAINTIFF'S AMENDED MOTION FOR PROTECTIVE ORDER**

The Court references its Order Granting in Part Plaintiff's Amended Motion for Protective Order [DIN 208], dated September 15, 2025; and the Court's Order in Furtherance of Order Granting in Part Plaintiff's Amended Motion for Protective Order [DIN 234], dated October 21, 2025. This Order addresses the deposition given by Plaintiff Lieutenant General Flynn (retired) on September 29, 2025.

Plaintiff identified three separate passages from his deposition transcript that he contends should be covered by the protective order and not publicly available or otherwise disclosed to any person or entity [DIN 235]. Defendant Stewartson responded in opposition [DIN 237]. The Court has reviewed those passages and, with one exception, rejects Plaintiff's claim.

The Court finds Plaintiff's testimony concerning security arrangements beginning at Page 43, line 17, with the sentence beginning "I mean – so my –..." through the end of the sentence on Page 45, line 3, should be covered by the protective order ("Protected Security Information"). Further, the Court finds that if this deposition is filed, the Protected Security Information passage needs to be redacted. (If the text or content of the Protected Security Information is required for any motion, a notice of confidential information must be filed at the same time as well as a motion to determine confidentiality of court records will need to be filed relating to any filing that references or contains the Protected Security Information). The Court concludes that this testimony is subject to public exemption pursuant to Florida Rule of General Practice and Judicial Administration 2.420(c)(9)(A)(i) and (vi).

IT IS THEREFORE ORDERED:

1. Defendant and Defendant's counsel shall not disclose to any person or entity the content of the Protected Security Information, regardless of context or medium. Defendant's counsel may disclose the Protected Security Information to an expert only after the expert files in

writing in the Court filed agreeing to be bound by the terms of this Protective Order and agreeing to personal jurisdiction in this Court relating to any enforcement or contempt proceedings for any alleged violation of this Protective Order.


2. If General Flynn's deposition is filed, the Protected Security Information passage must be redacted before filing the deposition.

3. If the text or content of the Protected Security Information is required to be filed as part of any filing, the filer must file both a notice of confidential information and a motion to determine confidentiality of court records at the time of filing that references this Order and the specific location of the text or content of the Protected Security Information within the filing.

4. Besides the Protected Security Information, no other portion of General Flynn's deposition needs to be redacted. No other portion of the deposition remains subject to the Protective Order.

5. Counsel for Defendant may arrange to retrieve from the Court's chambers the transcript of the deposition of General Flynn.

DONE AND ORDERED in Sarasota, Sarasota County, Florida, on October 27, 2025.


10/27/2025 1:39 PM 2023 CA
004264 NC
e-Signed 10/27/2025 1:39 PM 2023 CA 004264 NC

HUNTER W CARROLL
Circuit Judge

SERVICE CERTIFICATE

On October 27, 2025, the Court caused the foregoing document to be served via the Clerk of Court's case management system, which served the following individuals via email (where indicated). On the same date, the Court also served a copy of the foregoing document via First Class U.S. Mail on the individuals who do not have an email address on file with the Clerk of Court.

GEORGE KARL RAHDERT
535 CENTRAL AVE
SAINT PETERSBURG, FL 33701

JONATHAN R HUFFMAN
3021 AIRPORT-PULLING RD N.
SUITE 202

NAPLES, FL 34105

STEPHEN B FRENCH
717 KING STREET
SUITE 200
ALEXANDRIA, VA 22314

CRAIG A WHISENHUNT
8130 66TH ST. N
SUITE 3
PINELLAS PARK, FL 33781

JARED J ROBERTS
717 KING ST STE 200
ALEXANDRIA, VA 22314

GEORGE A D THURLOW
535 CENTRAL AVE STE 200
ST. PETERSBURG, FL 33701

RAHDERT & MORTIMER, PLLC
ATTORNEYS AT LAW

THE ALEXANDER BUILDING
535 CENTRAL AVENUE
ST. PETERSBURG, FLORIDA 33701-3703

*file in
Court file*

GEORGE K. RAHDERT
THOMAS E. REYNOLDS (1948-2010)
STEPHEN MORTIMER
JOSEPH F. MILLIGAN
GEORGE A.D. THURLOW

PHONE
(727) 823-4191
FACSIMILE
(727) 823-6189

October 17, 2025

The Honorable Judge Hunter Carroll
Twelfth Judicial Circuit—Sarasota County Civil Division C
Judge Lynn N. Silvertooth Judicial Center
2002 Ringling Boulevard
Sarasota, FL 34237

VIA HAND DELIVERY

Re: *Flynn v. Stewartson*
Case No. 2023 CA 004264 NC
Order Granting in Part Plaintiff's Amended Motion for Protective Order
Deposition Transcript of Plaintiff Michael T. Flynn

Dear Judge Carroll:

On September 15, 2025, Your Honor entered an Order Granting in Part Plaintiff's Amended Motion for Protective Order [DIN 208] which set forth a detailed procedure for determining what portions, if any, of the Plaintiff's deposition should be confidential. That procedure gave the Plaintiff seven (7) calendar days after receiving the deposition transcript to file a listing of the page and line numbers of any portions of the Plaintiff's deposition that the Plaintiff contends should be exempt from public disclosure.

Plaintiff's deposition took place on September 29, 2025 before a Court Reporter from Milestone Reporting Company and ordered a copy of the deposition transcript.

On October 8, 2025 at 5:18pm, Milestone Reporting Company provided counsel with the transcript from the deposition of Michael T. Flynn which took place on September 29, 2025.

More than seven (7) calendar days have passed since receipt of the deposition transcript, and the Plaintiff has **not filed** a listing of the page and line numbers of any portions of the Plaintiff's deposition that the Plaintiff contends should be exempt from public disclosure.

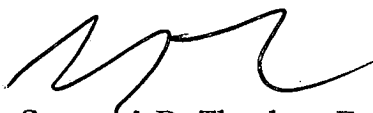
Accordingly, on behalf of Mr. Stewartson, we are requesting that the Court lift its protective order concerning the Plaintiff's deposition or alternatively identify if any portions need to be kept confidential. Mr. Stewartson and his counsel desire clarification regarding the status of these materials as Mr. Stewartson, through

counsel, intends to file a motion with the court in the near future that will require citations to the Plaintiff's deposition.

Given that the Order sets forth a procedure which differs from Florida Rule of General Practice and Judicial Administration 2.420 and that counsel does not want to risk violating the Court's order, we are providing Your Honor with a physical copy of the deposition transcript in a signed and sealed envelope for your review. If Your Honor desires a digital copy of the transcript, we are willing to provide such upon request.

Should there be any questions concerning this matter, or should Your Honor desire a Case Management Conference to address this issue, please do not hesitate to contact me at (727)823-4191 or gthurlow@rahdertlaw.com.

Sincerely,



George A.D. Thurlow, Esquire
Co-Counsel for Defendant Jim Stewartson

Cc: Jared Roberts, Esquire (via email)
Stephen French, Esquire (via email)
Craig Whisenhunt, Esquire (via email)

GT/tmom
Enclosure