

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

MICHAEL T. FLYNN,

Plaintiff,

v.

Case No. 2023-CA-004264 NC

Division: C Circuit Civil

JIM STEWARTSON, *et al.*,

Defendants.

**NOTICE OF UNILATERALLY SET HEARING ON DEFENDANT
RICK WILSON'S MOTIONS FOR ATTORNEYS FEES AND COSTS¹**

PLEASE TAKE NOTICE that undersigned counsel for Defendant, Rick Wilson, will call up for hearing before the Honorable Hunter Carroll on **March 3, 2025, at 9:30 a.m.**, at the Judge Lynn N. Silvertooth Judicial Center, 2002 Ringling Blvd., Courtroom 6C, Sarasota, Florida, or as soon thereafter as may be heard, Defendant Rick Wilson's Motion for Attorney's Fees and Costs, filed on February 19, 2024 (DIN 90); and Defendant Rick Wilson's Motion for Appellate Attorneys' Fees and Costs, filed on February 3, 2025 (DIN 131). Fifteen (15) minutes have been reserved for this hearing.

The parties may appear in-person or remotely via Zoom. To join via Zoom, use the information listed below:

Link: <https://www.zoom.us/>

Click "Join A Meeting"

Meeting ID: 353 234 4884

Password: 756433

¹ Defendant's counsel has made three attempts to coordinate this hearing with Plaintiff's counsel but has received no response. (See Exhibit A.)

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the Sarasota County Jury Office, P.O. Box 3079, Sarasota, Florida 34230-3079, (941) 861-8000, at least seven (7) days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven (7) days; if you are hearing or voice impaired, call 711.

Respectfully submitted on February 11, 2025.

/s/ Leonard M. Collins
Leonard M. Collins (FBN: 423210)
GRAYROBINSON, P.A.
301 South Bronough Street, Suite 600
Tallahassee, Florida 32301
Telephone: 850 577-9090
leonard.collins@gray-robinson.com
Attorney for Defendant, Rick Wilson

CERTIFICATE OF SERVICE

I certify that, on February 11, 2025, the foregoing document was furnished by email to all individuals identified on the Service List that follows.

/s/ Leonard M. Collins
Leonard M. Collins (FBN 423210)
GRAYROBINSON, P.A.

SERVICE LIST

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RIPLEY WHISENHUNT, PLLC
8130 66th Street North, Suite 3
Pinellas Park, Florida 33781
craiggrwrlawfirm.com
efiling@rightingwrongsflorida.com
Attorneys for Defendant, Jim Stewartson

George K. Randert
George A.D. Thurlow
RANDERT & MORTIMER, PLLC
535 Central Avenue, Suite 200
St. Petersburg, Florida 33701
grandertarandertlaw.com
service@arandertlaw.com
gthurlow@randertlaw.com
tmccreary@randertlaw.com
Attorneys for Defendant, Jim Stewartson

Jared J. Roberts
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
jared@binnall.com
Counsel for Plaintiff, Michael T. Flynn

Jonathan R. Huffman
James A. Boatman, Jr.
BOATMAN RICCI
3021 Airport-Pulling Rd. N., Suite 202
Naples, Florida 34105
courtfilings@boatnmanricci.com
jrh@boatmanricci.com
Attorneys for Plaintiff, Michael T. Flynn

Exhibit A

Vanessa Reichel

From: Vanessa Reichel
Sent: Thursday, February 6, 2025 5:33 PM
To: 'shawnay@binnall.com'; 'jared@binnall.com'; 'jrh@boatmanricci.com'; 'stephen@binnall.com'
Cc: Leonard Collins; 'grahdert@rahdertlaw.com'; 'tmccreary@rahdertlaw.com'; 'craig@rightingwrongsflorida.com'; 'gthurlow@rahdertlaw.com'
Subject: RE: Flynn v. Wilson - Hearings
Importance: High

Good afternoon,

Please see below and let me know your availability as soon as possible.

Thanks,
Vanessa

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Cc: Leonard Collins <leonard.collins@gray-robinson.com>
Subject: Flynn v. Wilson - Hearings

Good afternoon,

Please see Judge Carroll's calendar (below) and advise re your availability to schedule the following hearings via Zoom:

1. Wilson's Motion for Attorney's Fees – 5 minutes
2. Wilson's Motion for Appellate Attorney's Fees – 5 minutes
3. Wilson's Motion for Sanctions – 30 minutes

5-Minute Calendar (below) – Len is available on all dates.

30-Minute Calendar (below) – Len is available on 3/20, 4/7 or 4/8.

Thanks,
Vanessa

Date	Time	Duration
02/24/2025 (Monday)	9:00 am	5 min
02/24/2025 (Monday)	9:15 am	5 min
02/25/2025 (Tuesday)	3:45 pm	5 min
02/27/2025 (Thursday)	9:00 am	5 min
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**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
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MICHAEL T. FLYNN,

Plaintiff,

v.

Case No. 2023-CA-004264 NC

Division: C Circuit Civil

JIM STEWARTSON, *et al.*,

Defendants.

**NOTICE OF UNILATERALLY SET HEARING ON
DEFENDANT RICK WILSON'S MOTION FOR SANCTIONS¹**

PLEASE TAKE NOTICE that undersigned counsel for Defendant, Rick Wilson, will call up for hearing before the Honorable Hunter Carroll on **March 20, 2025, at 10:00 a.m.**, at the Judge Lynn N. Silvertooth Judicial Center, 2002 Ringling Blvd., Courtroom 6C, Sarasota, Florida, or as soon thereafter as may be heard, Defendant Rick Wilson's Motion for Sanctions, filed on December 7, 2023 (DIN 51). Thirty (30) minutes have been reserved for this hearing.

The parties may appear in-person or remotely via Zoom. To join via Zoom, use the information listed below:

Link: <https://www.zoom.us/>

Click "Join A Meeting"

Meeting ID: 353 234 4884

Password: 756433

¹ Defendant's counsel has made three attempts to coordinate this hearing with Plaintiff's counsel but has received no response. (See Exhibit A.)

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Respectfully submitted on February 11, 2025.

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Telephone: 850 577-9090
leonard.collins@gray-robinson.com
Attorney for Defendant, Rick Wilson

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**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION**

Michael T. Flynn,
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson,
Rick Wilson,
Defendants.

_____ /

NOTICE OF TAKING IN-PERSON VIDEO DEPOSITION

TO: All Parties and Counsel

PLEASE TAKE NOTICE that Counsel for the Defendant, JIM STEWARTSON, will take the video deposition duces tecum by oral examination, of the person named below, via Zoom:

Deponent	Date and Time	Location
Michael T. Flynn	Tuesday March 4 th , 2025 ¹ 9:30am	U.S. Legal Support 401 N. Cattlemen Road Suite 104 Sarasota, FL 34232

Before an Associate or Deputy Court Reporter and Notary Public of the U.S. Legal Support, or before their duly designated representative and videographer who is not of counsel to the parties or interested in the event of the cause. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure.

Dated: February 11, 2025

/s/ George A.D. Thurlow

George A.D. Thurlow, Esquire
FBN 1019960

¹ Counsel for Defendant Stewartson has attempted to clear deposition dates for the Plaintiff on January 13, 2025, February 5, 2025, and February 10, 2025 but Plaintiff's counsel has not provided any dates/times that they or the Plaintiff is available. Accordingly, this deposition has been scheduled unilaterally.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served upon all counsel of record via Florida E-Filing Portal on this 11th day of February, 2025.

/s/ George A.D. Thurlow

George K. Rahdert, Esquire

FBN 213365

George A.D. Thurlow, Esquire

FBN 1019960

Rahdert & Mortimer, PLLC

535 Central Avenue, Suite 200

St. Petersburg, FL 33701

Phone: (727)823-4191

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Email: grahdert@rahdertlaw.com
service@rahdertlaw.com
gthurlow@rahdertlaw.com
tmccreary@rahdertlaw.com

Craig A. Whisenhunt, Esquire

FBN 81745

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Pinellas Park, FL 33781

Phone: (727)256-1660

Email: craig@rwrlawfirm.com
efiling@rightingwrongsflorida.com

Attorneys for Defendant, STEWARTSON

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 ON HEARINGS SET ON MARCH 3 AND MARCH 20, 2025

The Court is in receipt of the motions and notices of hearing [DINs 138 and 139] for the March 3rd and 20th hearings. The Court notes that both hearings were unilaterally set due to no response from Plaintiff's counsel. The Court requests Plaintiff to respond as to whether this is true and, if so, why Plaintiff's counsel did not respond to Defendant's requests.

The Court requests a response by 4:00 p.m. on Monday, February 17, 2025.

DONE AND ORDERED in Sarasota, Sarasota County, Florida, on February 13, 2025.


2/13/2025 3:46 PM 2023 CA
004264 NC
e-Signed 2/13/2025 3:46 PM 2023 CA 004264 NC

HUNTER W CARROLL
Circuit Judge

SERVICE CERTIFICATE

On February 13, 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

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

MICHAEL T. FLYNN,

Plaintiff,

v.

JIM STEWARTSON, et al.,

Defendants.

Case No.: 2023 CA 004264 NC

Division C Circuit

RESPONSE TO THE COURT'S FEBRUARY 13, 2025, ORDER

On February 11, 2025, Defendant, Rick Wilson, unilaterally set various motions for hearing. On February 13, 2025, the Court ordered undersigned counsel to respond, explaining "why Plaintiff's counsel did not respond to Defendant's requests." Undersigned counsel responds as follows:

During the timeframe that defense counsel contacted undersigned counsel, Mr. Roberts was away dealing with the death of a family member. During this same time, Mr. French was entrenched in depositions and trial preparation for a case going to trial in March 2025 in Virginia. Upon undersigned counsel regrouping, and deciding on a response, defense counsel noticed the motions for hearing. Undersigned counsel was weighing whether to agree to any such dates, or whether to move to stay these proceedings during the pendency of Plaintiff's appeal to the Florida Supreme Court. In light of this, Plaintiff will be filing a forthcoming motion to stay proceedings while this case remains pending with the Florida Supreme Court. Should the Court deny Plaintiff's motion to stay, however, undersigned counsel will be prepared to attend

the dates that defense counsel has chosen. Undersigned counsel apologizes to the Court for the inconvenience.

Dated: February 17, 2024

Respectfully submitted,

/s/ Jared Roberts
Jared J. Roberts
Fl. Bar No. 1036550
Stephen B. French
Fl. Bar No. 0078761
BINNALL LAW GROUP, PLLC
717 King Street, Suite 200
Alexandria, Virginia 22314
Phone: (703) 888-1943
Fax: (703) 888-1930
Email: stephen@binnall.com
jared@binnall.com

Counsel for Michael T. Flynn

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2025, I have caused a true and accurate copy of the foregoing to be delivered to counsel of record via e-filing.

/s/ Jared Roberts
Jared J. Roberts
(Fl. Bar No. 1036550)

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

MICHAEL T FLYNN,
Plaintiff,

v.

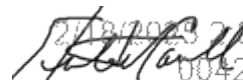
CASE NO. 2023 CA 004264 NC
DIVISION C CIRCUIT

JIM STEWARTSON,
RICK WILSON,
MEIDASTOUCH LLC,
Defendant.

ORDER DISCHARGING SHOW CAUSE

In the light of the response from counsel [DIN 141], the Court discharges the show cause associated with the Court's February 13, 2025, Order.

DONE AND ORDERED in Sarasota, Sarasota County, Florida, on February 18, 2025.


2/18/2025 2:38 PM 2023 CA
004264 NC
e-Signed 2/18/2025 2:38 PM 2023 CA 004264 NC

HUNTER W CARROLL
Circuit Judge

SERVICE CERTIFICATE

On February 18, 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.

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