

**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,  
Defendant.

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**AMENDED NOTICE OF TAKING ZOOM VIDEO DEPOSITION DUCES TECUM**

*(Rescheduled from 3/4/25 at the request of the Plaintiff, 3/25/25 upon  
agreement of the parties, and 4/28/25)*

TO: All Parties and Counsel

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

<b>Deponent</b>	<b>Date and Time</b>	<b>Location</b>
Michael T. Flynn	Monday September 29, 2025 10:00am ET	ZOOM **The link is not provided in this Notice and will be emailed only to counsel of record pursuant to Court Order**

Before an Associate or Deputy Court Reporter and Notary Public of MILESTONE REPORTING COMPANY, or before their duly designated representative and videographer who is not of counsel to the parties or interested in the event of the cause. The deposition will be recorded via video by a videographer.

Pursuant to Florida Rule of Civil Procedure 1.310(b)(5), the deponent is required to bring to the deposition the following documents and tangible things:

- (1) All documents and exhibits you intend to introduce at trial;
- (2) All documents which you rely upon to support your allegation that you have suffered financial losses as a result of Defendant Jim Stewartson;

- (3) All documents which you rely upon to support your allegation that you suffered mental anguish as a result of Defendant Jim Stewartson;
- (4) All documents which you rely upon to support your allegation that you suffered embarrassment as a result of Defendant Jim Stewartson;
- (5) All documents which you rely upon to support your allegation that you suffered humiliation as a result of Defendant Jim Stewartson; and
- (6) All documents which you rely upon to support your allegation that you suffered damage to your reputation as a result of Defendant Jim Stewartson.

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.

You are hereby notified that the undersigned will apply to the court for appropriate relief, including an order of contempt, should the witness fail to appear or produce the requested documents without valid legal excuse.

Dated: September 25, 2025

**/s/ George A.D. Thurlow**

George A.D. Thurlow, Esquire  
FBN 1019960

**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 11<sup>th</sup> day of April, 2025.

**/s/ George A.D. Thurlow**

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