

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

**PLAINTIFF'S NOTICE OF TAKING REMOTE
DEPOSITION DUCES TECUM OF DEFENDANT JIM STEWARTSON**

TO: All Parties and Counsel

PLEASE TAKE NOTICE that Counsel for Plaintiff, MICHAEL T. FLYNN, will take the deposition duces tecum by oral examination, of the person named below:

DEPONENT	DATE AND TIME	LOCATION
Jim Stewartson	Thursday October 2 nd , 2025 at 10:00am ET	Remotely by Remote Legal

Before Remote Legal, a 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; and

2. All documents which you rely upon in the defense 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 30, 2025

Respectfully submitted,

/s/ Jared J. Roberts
Jared J. Roberts, FBN 1036550
Stephen B. French, FBN 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 September 30, 2025, I have caused a true and accurate copy of the foregoing to be delivered to the parties below via e-filing.

George K. Rahdert
George A.D. Thurlow
Rahdert & Mortimer, PLLC
535 Central Avenue, Suite 200
St. Petersburg, FL 33701
Phone: (727)823-4191
Fax: (727)823-6189
grahdert@rahdertlaw.com
gthurlow@rahdertlaw.com

Craig A. Whisenhunt
Ripley Whisenhunt, PLLC
8130 66th Street North, Suite 3
Pinellas Park, FL 33781
Phone: (727)256-1660
craig@rwrlawfirm.com

Counsel for Defendant Jim Stewartson

/s/ Jared J. Roberts
Jared J. Roberts, FBN 1036550

Counsel for Michael T. Flynn