

**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 AMENDED 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 1:00pm EST	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
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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.

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Counsel for Michael T. Flynn