

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 DEPOSITION TRANSCRIPT
CONFIDENTIALITY DESIGNATIONS**

Plaintiff, Michael T. Flynn, through counsel, hereby designates the following portions of his deposition transcript as confidential. While the majority of Plaintiff's deposition is not reasonably confidential, Plaintiff respectfully requests that the following portions of his deposition remain confidential:

- 43:16–45:3- This section discusses how the private details of how Plaintiff's security operates, functions, and plans.
- 81:20–83:24- This section discusses Plaintiff's private business dealings, including the parties to those business dealings and the date ranges of those business dealings.
- 136:23–138:17- This section discusses Plaintiff's private business dealings, including the parties to those business dealings and the date ranges of those business dealings.

Undersigned counsel regrets the delay in transmitting Plaintiff's confidentiality designations—the court reporter's email notice of transcript availability was not appreciated until a latter date.

Dated: October 21, 2025

Respectfully submitted,

/s/ *Jared J. Roberts*

Jared J. Roberts, FBN 1036550

Stephen B. French, FBN 0078761

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Counsel for Michael T. Flynn

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2025, I have caused a true and accurate copy of the foregoing to be delivered to counsel of record via e-filing.

/s/ Jared J. Roberts

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

Counsel for Michael T. Flynn

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

CASE NUMBER: **2023 CA 004264 NC**

MICHAEL T FLYNN

PLAINTIFF

- VS -

JIM STEWARTSON

DEFENDANT / RESPONDENT

**CLERK NOTICE OF NON COMPLIANCE AND REQUEST FOR COMPLIANCE WITH
FLA. R. GEN. PRAC. & JUD. ADMIN.2.420**

The Sarasota Clerk of the Circuit Court has reviewed your filing dated October 21, 2025 which was identified by you as containing confidential information.

- The Clerk is unable to determine the location of the information sought to be held confidential, as the Notice of Confidential Information within Court Filing (Notice) lacks specificity and/or the precise location of the confidential information within the document being filed. Pursuant to Fla. R. Gen. Prac. & Jud. Admin. 2.420(d)(2), the filer is required to identify the information (social security number, bank account number, etc.) and the *precise location of the confidential information within the document being filed*. **PLEASE RESUBMIT YOUR NOTICE IDENTIFYING THE SPECIFIC INFORMATION TO BE REDACTED ALONG WITH THE DIN NUMBER OF THE DOCUMENT YOU ARE IDENTIFYING AS CONFIDENTIAL.** Resubmission of a Notice in accordance with this request is necessary for the information to be held as confidential by the Clerk.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice in the above styled case has been furnished by U.S. Mail on October 22, 2025 to the filing party at the address listed below:

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



KAREN E. RUSHING
CLERK OF THE CIRCUIT COURT

A handwritten signature in black ink, appearing to read "K. McLaurin".

By **K. MCLAURIN**, Deputy Clerk

Date: October 22, 2025