

**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.

_____ /

**AMENDED NOTICE OF TAKING IN-PERSON VIDEO DEPOSITION DUCES
TECUM**

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

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:

Deponent	Date and Time	Location
Michael T. Flynn	Monday, April 28, 2025 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. 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: April 11, 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 11th day of April, 2025.

/s/ George A.D. Thurlow

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