



VILLAGE OF PALMETTO BAY
9705 E. HIBISCUS STREET
PALMETTO BAY, FLORIDA 33157
(305) 259-1234 Fax: (305) 259-1290

Approved
Edward Silva, Village Manager
Date

REQUEST FOR PUBLIC RECORDS

Requests are filled in accordance with the provisions of Chapters 119 and 257, Florida Statutes.

DATE: 8-9-19
NAME: John M. Joyce, Esq.
COMPANY: Dean, Ringers, Morgan and Lawton
ADDRESS: P.O. Box 2928, Orlando, FL 32802-2928
PHONE: 407422-4310 FAX:
EMAIL: jjoyce@drml-law.com; marie@drml-law.com

REQUEST (Attach additional page, if necessary): Copies of the following documents:

*Please see attached Amended
Subpoena - Case # 2018-024917 CA 01

FOR USE BY VILLAGE STAFF ONLY TRACKING NO.: 209-256
DATE FORWARDED: 8-12-19 ASSIGNED DEPT: Building
DATE REQUEST FILLED: NUMBER OF COPIES:
ESTIMATED TIME (IF APPLICABLE): ESTIMATED COST:
HOW WAS REQUEST FILLED?
IF NOT FILLED, REASON:
BY:

DEAN, RINGERS, MORGAN AND LAWTON

A PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW

GOBLE D. DEAN [1913-2000]
ANDREW L. RINGERS [1937-2014]
DALE O. MORGAN (OF COUNSEL)
WILLIAM E. LAWTON *##*+++
LAMAR D. OXFORD #
F. SCOTT PENDLEY *++
JOHN D. ROBINSON
FRANK C. WESIGHAN +
JEFFREY J. BRANHAM +
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RONALD P. GRENINGER
MICHAEL A. LOWE +
JOHN T. CONNER
BRYAN A. LOWE +
GLORIA A. CARR
JOSHUA B. WALKER
GAIL C. BRADFORD

MAIN OFFICE:

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201 EAST PINE STREET, SUITE 1200 (32801)
POST OFFICE BOX 2928
ORLANDO, FL 32802-2928
(407) 422-4310
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PLEASE REPLY TO MAIN OFFICE

SATELLITE OFFICES:

FORT LAUDERDALE, FL 33301
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* FLORIDA BAR BOARD CERTIFIED CIVIL TRIAL LAWYER
+ FLORIDA BAR BOARD CERTIFIED WORKERS' COMPENSATION LAWYER
FLORIDA BAR BOARD CERTIFIED APPELLATE PRACTICE LAWYER

ADMITTED TO THE DIST. OF COLUMBIA BAR
** ADMITTED TO THE GEORGIA BAR
*** ADMITTED TO THE ILLINOIS BAR
*** ADMITTED TO THE NEW YORK BAR

August 9, 2019

Via Email

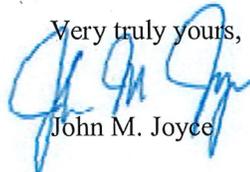
Claudio Riedi, Esquire
Lehitinen, Shultz, Riedi, De La Fuente
Sabadell Financial Center
1111 Brickell Avenue
Suite 2200
Miami, FL 33131

RE: Reguera, Rogelio and Isabel Garcia-Reguera v. Citizens Property Insura
Case No.: 2018-024917 CA 01
Claim No.: 001-00-162672
DOL: 9/10/2017

Dear Mr. Riedi:

Thank you for contacting my office yesterday regarding the above matter. Regarding the Subpoena that was served upon the Clerk of Village of Palmetto Bay, you advised us you would have the requested documents copied. However, you had a question concerning the scope of the documents requested. I have attached an Amended Subpoena Duces Tecum Without Deposition and Amended Exhibit "A". The documents requested are for the period from June 1, 2017 to the present. Should you have questions regarding the Amended Subpoena and Amended Exhibit "A", please contact my office. I appreciate your cooperation in this matter.

Very truly yours,



John M. Joyce

JMJ/gr

Enclosures

cc: Malcolm Jones-Citizens Property Insurance Corporation w/enc.

Ruzy Behnejad, Esquire w/enc.

Michael Chisholm, Esquire w/enc.

39320781

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

ROGELIO REGUERA and
ISABEL GARCIA-REGUERA,

CASE NO.: 2018-024917 CA 01

Plaintiffs,

vs.

CITIZENS PROPERTY INSURANCE
CORPORATION,

Defendant.

AMENDED SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Records Custodian for Village of Palmetto Bay
c/o Clerk of Village of Palmetto Bay
9705 East Hibiscus Street, Palmetto Bay, Florida 33157

YOU ARE COMMANDED to provide, within twenty (20) days, at the offices of DEAN, RINGERS, MORGAN & LAWTON, P.A., 201 E. Pine Street, Suite 1200, Orlando, FL 32801 (Mail to P.O. Box 2928, Orlando, FL 32802-2928), the following:

SEE ATTACHED EXHIBIT A

YOU MUST PRODUCE EACH AND EVERY PIECE OF PAPER CONTAINED IN YOUR RECORDS REGARDING THE INDIVIDUAL REFERENCED, WHETHER PREPARED BY YOU OR NOT, INCLUDING LETTERS OR RECORDS SENT TO YOU FROM ANOTHER SOURCE. LEAVE NOTHING OUT FOR ANY REASON.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this Subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this Subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this Subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

1. appear as specified; or
2. furnish the records instead of appearing as provided above; or
3. object to this Subpoena,

you may be in contempt of Court. You are subpoenaed by the following attorney, and unless excused from this Subpoena by this attorney or the Court, you must respond to this Subpoena as directed.

Dated: August 9, 2019.

/s/John M. Joyce

JOHN M. JOYCE, ESQ.

Florida Bar No. 0935750

Dean, Ringers, Morgan & Lawton, P.A.

Post Office Box 2928

Orlando, FL 32802-2928

Tel: 407-422-4310 Fax: 407-648-0233

JJoyce@drml-law.com

Marie@drml-law.com

Attorneys for Defendant

If you are a person with a disability who needs any accommodation in order to respond to this subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the attorney at the address and phone number listed above at least 7 days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

AMENDED EXHIBIT A

Pursuant to the attached subpoena, please produce the following items from any and all sources, including files, computers, and other electronic depositories:

1. Any and all documents, records, diagrams, contracts, correspondence, e-mails and permits, applications for the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

2. Any and all construction and inspection notes from any employee or any individual who inspected the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

3. Any and all reports from any employee or any individual who inspected the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

4. Any and all photographs taken and diagrams created from any inspections or evaluations, reroofs repairs for the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

5. Any and all permits, applications and addendums for permits for any construction, remodeling, additions, repairs, destructions of any kind for the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

6. Any and all Notices of Commencements, documents, addendums, building code, regarding any construction, remodeling, destructions, repairs of any kind for the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

7. Any and all documents, invoices, warranties, photographs, work or purchase order, and installation diagrams regarding any products installed, repaired, replaced or relocated for any construction, installation, remodeling, destructions, repairs of any kind for the property located at 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**

8. Any and all other documents, including but not limited to e-mails, correspondence, diagrams, photographs, reports in your possession which were created and have not been produced pursuant to the seven (7) requests above for the property located 8338 SW 182nd Terrace, Palmetto Bay, FL 33157; Homeowners: Rogelio Reguera and Isabel Garcia-Reguera **from June 1, 2017 to the present.**