

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

TAYLOR MADE GOLF COMPANY, INC.

UCN:

Plaintiff,

Case No.: 2020CC002405SC

vs.

Division:

CLOUD TEN! MARKETING GROUP, LLC,
and RICHARD SMITH III, Individually,

Defendant.

NOTICE OF TAKING DEPOSITION DUCES TECUM

TO: Ian Horn, Esquire, Attorney for Defendant, at IanHornLaw@gmail.com,

PLEASE TAKE NOTICE that the Plaintiff will take the deposition of Richard Smith III, individually and on behalf of Defendant, CLOUD TEN! MARKETING GROUP, LLC, by oral examination, before MARCADIS SINGER, P.A., Attorneys for Plaintiff, at Court Reporting Specialists, LLC. This deposition will be held via the Zoom webcast platform on **Monday, November 22, 2021 at 2:45 p.m.**, pursuant to the Rules of Civil Procedure. 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.

THE WITNESS SHOULD HAVE A GOVERNMENT-ISSUED IDENTIFICATION TO PROVIDE TO THE COURT REPORTER/NOTARY TO CONFIRM HIS/HER IDENTITY AT THE COMMENCEMENT OF THE DEPOSITION AND BEFORE BEING SWORN.

Join Zoom Meeting

<https://us02web.zoom.us/j/89725548458?pwd=ckNZaXo2VFV0Wk5NbDRndWRVb3czZz09>

Meeting ID: 897 2554 8458

Passcode: 012298

The deponent is to have with him/her at said time and place the following:

All **personal** and **corporate** records including, but not limited to, the following records and documents:

1. The following records for the 36 months immediately preceding the service of this subpoena: All bank statements and cancelled checks; all savings account deposit books; copies of federal and state tax returns; books of record or all memoranda reflecting your assets and/or income.
2. Deeds to realty, bills of sale for personalty; title certificates to motor vehicles. All deeds of conveyance of the past three (3) years on any properties Defendant(s) have owned, either individually or jointly with others.
3. Proof of income including, but not limited to, pay stubs, for the three (3) years preceding the service of this subpoena.
4. All cancelled checks and bank statements including deposits of each and every bank account maintained by Defendant(s) or with any other person or entity for the past three (3) years.

5. Copies of Defendant(s) Federal Income Tax Returns for the past three (3) years and records of Defendant(s) earnings for this year to date.
6. All financial statements Defendant(s) have prepared or that someone has prepared in Defendant's behalf which show Defendant(s) properties, assets, and liabilities during the past three (3) years.
7. All original title certificates or copies thereof or any registration records showing the ownership by Defendant(s), individually or jointly, with any other person or entity, or any motor vehicle, boat, trailer, airplane, or any other tangible personal property.
8. All corporate minute books, records of Director meetings, and records of stock ownership.
9. All records of open or unpaid accounts receivable, credits, or other property or money owed to Defendant(s).

Any minor subpoenaed for testimony shall have the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of Section 90.616, Florida Statutes, except upon a showing that the presence of the parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

If you are a person with a disability who needs any accommodation in order to participate in this deposition, you may request such assistance by contacting MARCADIS SINGER, P.A., 5104 South Westshore Blvd., Tampa, FL 33611, 813/288-1881, within two (2) working days of your receipt of this Subpoena; if you are hearing or voice impaired, call 711.

PLEASE GOVERN YOURSELF ACCORDINGLY.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was provided to the above addressee(s), this 19 day of Oct, 2021.

Respectfully submitted,

MARCADIS SINGER, P.A.

By: 

() Ralph S. Marcadis, Esquire, FL Bar #351458
() Robert J. Lindeman, Esquire, FL Bar #112608
() Stuart H. Marcadis, Esquire, FL Bar #121587
5104 South Westshore Blvd., Tampa, FL 33611
813/288-1881, toll free 888/547-1881
Fax: 813/288-9678
E-service: pleadings@marcadislaw.com
ATTORNEY FOR PLAINTIFF

211019/102063/Llemus

This is a communication from a debt collector. We are attempting to collect a debt. Any information you provide may be used for that purpose.