

Date 11/22/24 Time 8:45 AM

MLZ/031-12th Circuit _____

STZ/283-12th Circuit _____

SZ/613-12th Circuit _____

TTJ/3008-12th Circuit _____

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

BRICK RULE,

Plaintiff,

v.

CASE NO. 2023 CA 5898

CORINNE A. RAGHEB, as Trustee
of the Corinne A. Ragheb Living Trust
dated December 26, 1990,

Defendant.

TOWN OF LONGBOAT KEY
2024 NOV 22 AM 08:48

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **Town of Longboat Key**
By serving Ken Schneier, Mayor
Town Hall
501 Bay Isles Road
Longboat Key, FL 34228

You are hereby commanded to produce without deposition and deliver by mail or email within ten (10) days of receipt of this subpoena copies of all records described in the attached Schedule A to Kimberly A. Bald, Esquire and Brian L. Trimyer, Esquire, Harlee & Bald, P.A., 202 Old Main Street, Bradenton, FL 34205.

You are not required to surrender the original items. You may comply with this subpoena (1) 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; and (2) by executing and returning the attached business records certification. 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.

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.


If you fail to furnish the records as provided above or object to this subpoena you may be in contempt of court.

You are subpoenaed by the following attorneys, and unless excused from this subpoena by these attorneys or the Court, you shall respond to this subpoena as directed.

IF THE COSTS ASSOCIATED WITH PRODUCING THE DOCUMENTS REQUESTED BY THIS SUBPOENA WILL EXCEED \$250.00, PLEASE CONTACT THE UNDERSIGNED ATTORNEY AT (941) 744-5537 BEFORE INCURRING ANY EXPENSES ASSOCIATED WITH THIS SUBPOENA.

Dated: November 12th, 2024.

HARLLEE & BALD, P.A.
202 Old Main Street
Bradenton, FL 34205
Telephone: (941) 744-5537
Facsimile: (941) 744-5547
KAB@harllee bald.com
BLT@harllee bald.com
BLY@harllee bald.com

By: 
KIMBERLY A. BALD
Florida Bar No. 0434190
BRIAN L. TRIMYER
Florida Bar No. 0183792

Attorneys for Plaintiff, Brick Rule

If you fail to locate these records you may comply with this subpoena by sending a letter stating that you have no records. Any and all further questions should be directed towards Kimberly A. Bald, Esquire at (941) 744-5537 or KAB@harllee bald.com.

SCHEDULE A

DOCUMENTS TO BE PRODUCED

1. Any documents and/or communications pertaining to 7015 Bayside Drive, Longboat Key, Florida 34228.
2. Any documents and/or communications including, but not limited to, building permit applications, development applications, surveys, plans, notes, logs, files, inspection reports and any other documents or communications relating to Town of Longboat Key Building Permit No. 24188 issued on or about May 21, 2007.
3. Any documents and/or communications including, but not limited to, building permit applications, development applications, surveys, plans, notes, logs, files, inspection reports and any other documents or communications relating to Town of Longboat Key Building Permit No. 12742 issued in approximately November 2007.
4. Any documents and/or communications relating to the as-built surveys and/or revised as-built surveys for Town of Longboat Key Building Permit No. 24188.
5. Any documents and/or communications relating to the ownership of the waterfront lot marked in yellow on Exhibit 1 attached hereto (hereinafter referred to as the "Property").
6. Any documents and/or communications pertaining to the construction of the dock and boat lift that was the subject of the building permits referenced in paragraphs 2 and 3 above.
7. Any communications by, between or among Samuel Ragheb, Corinne Ragheb (individually and/or as Trustee of the Corinne A. Ragheb Living Trust), any attorney or employee of Icard, Merrill Cullis, Timm, Furen & Ginsburg, P.A., Steve Schield, Custom Dock & Davit, Inc., MSB Surveying, Inc., and/or Martin Britt regarding 7015 Bayside Drive, Longboat Key, Florida 34228, the installation of the dock and boat lift referenced in paragraphs 2-4 and 6 above, or the ownership of the Property.

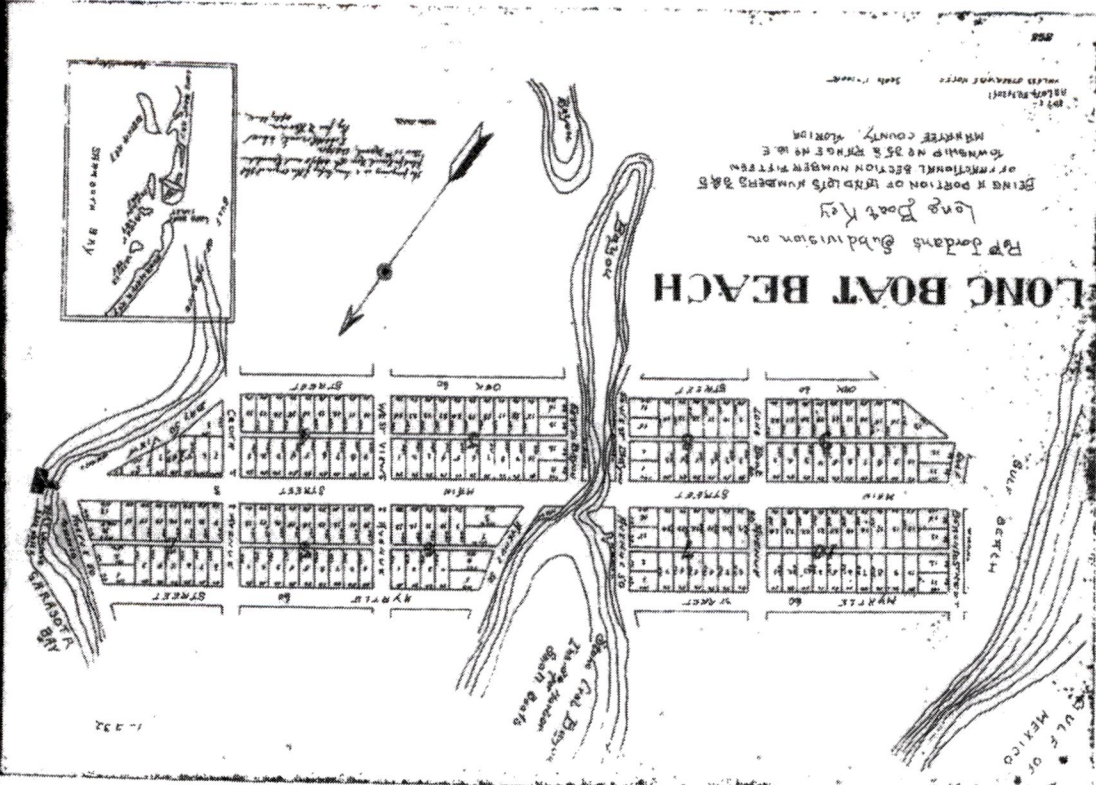


EXHIBIT
1

BUSINESS RECORDS CERTIFICATION

Pursuant to Sections 90.803(6) and 90.902(11), Florida Statutes

To Whom It May Concern:

I, _____, am currently employed with:

Business Name: _____

Business Address: _____

Attached hereto are true and correct copies of records maintained by my company of which I am the custodian. I further hereby certify that such records:

- (a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person having knowledge of those matters;
- (b) Were kept in the course of the regularly conducted activity; and
- (c) Were made as a regular practice in the course of the regularly conducted activity.

I hereby certify and declare under penalty of perjury that the foregoing is true and correct.

Signed on this _____ day of _____, 2024.

Affiant Signature

STATE OF _____

COUNTY OF _____

The foregoing instrument was acknowledged before me this _____ day of _____, 2024, by _____, who is personally known to me or who has produced _____ (type of identification) as identification.

(SEAL)

Notary Public
My Commission Expires:



Here Comes The Judge
Legal Process Services
4071 Bee Ridge Rd. Suite 202
Sarasota, FL 34233

AMERICAN MOMENTUM BANK

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63-1487/0631

11/20/2024

**PAY TO THE
ORDER OF**

Town of Longboat Key

\$

****5.00**

Five and 00/100*****

DOLLARS

Town of Longboat Key

MEMO

24-11168

AUTHORIZED SIGNATURE

⑈052073⑈

⑈[REDACTED]⑈

[REDACTED]

Here Comes The Judge
Town of Longboat Key

11/20/2024

052073
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HERE COMES THE J 24-11168

5.00

Security features. Details on back.



X _____

FOR MOBILE DEPOSIT ONLY TO

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