

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

FONTANA ESTATES HOMEOWNERS
ASSOCIATION, INC., a Florida not-for-profit
corporation,

Plaintiff,

CASE NO: 2020-CA-6569-O

v.

TOLL FL VIII LIMITED PARTNERSHIP, a
Foreign limited partnership; and TOLL BROS. INC.,
a foreign for-profit corporation,

Defendants.

PLAINTIFF'S RESPONSES TO DEFENDANTS'
SECOND REQUEST FOR PRODUCTION TO PLAINTIFF

Plaintiff, FONTANA ESTATES HOMEOWNERS ASSOCIATION, INC. (the
"Association"), by and through its undersigned counsel and pursuant to Rule 1.350 of the Florida
Rules of Civil Procedure, hereby responds to the second request for production from Defendants,
TOLL FL VIII LIMITED PARTNERSHIP and TOLL BROS., INC, as follows:

GENERAL OBJECTIONS

1. Plaintiff's objections are made expressly subject to, and without waiver of any
objections to competency, relevancy, materiality, privilege, or admissibility of any of the
Responses given herein, or of the subject matter thereof, in any proceeding. The objections are
also made subject to Plaintiff's right to object to any further discovery involving or relating to the
subject matter of the Requests.

2. Plaintiff objects to any Request that seeks disclosure of documents that are matters
of public record or easily obtainable from another source, for which the burden of production on
Plaintiff is equal to that of the Defendants. Any such Request will be viewed as harassing, and

Defendants and their counsel are directed to seek production of the requested documents from the appropriate public records or other sources.

3. These objections and limitations are incorporated by reference into each of the Responses set forth below. The assertion of the same, similar or additional objections in Plaintiff's Specific Objections to individual Requests, or the failure to assert any additional objections to a particular Request, does not waive any of Plaintiff's objections set forth in this section or the following sections.

RESPONSES TOLL'S REQUEST FOR PRODUCTION OF DOCUMENTS TO FONTANA ESTATES

1. Any and all estimates, recommendations, reports, and evaluations regarding the ponds, roads and sidewalks.

Response: All responsive documents in the Association's possession will be produced by share link.

2. Any and all communications between the management company and the Fontana Board regarding the ponds, roads and sidewalks.

Response: All responsive documents in the Association's possession will be produced by share link.

3. Any and all communications between the Fontana Board and members of the community regarding the ponds, roads and sidewalks.

Response: All responsive documents in the Association's possession will be produced by share link.

4. Any and all documents created for the Hall Company, Inc. resealing project.

Response: All responsive documents in the Association's possession will be produced by share link.

5. Any and all Invoices, pay applications, and change orders from the Hall Company, Inc. resealing project to the Fontana HOA.

Response: All responsive documents in the Association's possession will be produced by share link.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 21st day of March, 2023, that a true and correct copy of the foregoing Notice was filed through the Florida statewide e-Portal system which will provide an electronic copy to all parties on the service list.

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