

EXHIBIT

2364

Notice of Depositions

William Michael Windsor <billwindsor1@outlook.com>

Sat 2/13/2021 7:40 AM

To: isabelmcampbell@gmail.com <isabelmcampbell@gmail.com>; isabel.campbell.coachhouses@gmail.com <isabel.campbell.coachhouses@gmail.com>; Edward Broom <BoardEBroomJr@outlook.com>; Sergio Naumoff <sergret62@yahoo.com>; wndkrauss@comcast.net <wndkrauss@comcast.net>; Sue Yokley <knitworthyorknot@gmail.com>; luz.tipton@gmail.com <luz.tipton@gmail.com>; Larry Lunsford <lunsfordlarry744@gmail.com>; donnahey@msn.com <donnahey@msn.com>; DENISE KING <dlking1957@comcast.net>; jjlynn_1998@yahoo.com <jjlynn_1998@yahoo.com>; golddust66@embarqmail.com <golddust66@embarqmail.com>; Jason Chandler <jeichandler@yahoo.com>; janeosteen@aol.com <janeosteen@aol.com>; billwindsor1@outlook.com <billwindsor1@outlook.com>; johnosteen708 <johnosteen708@gmail.com>; Karen Meade <meadek@lssc.edu>; rutigs@gmail.com <rutigs@gmail.com>; christina.a.campbell@gmail.com <christina.a.campbell@gmail.com>; drignall@gmail.com <drignall@gmail.com>
Bcc: billwindsor1@outlook.com <billwindsor1@outlook.com>

📎 1 attachments (909 KB)

2019-CA-1647-Subpoena-Duces-Tecum-for-Deposition-Marta-Carbajo-2021-02-08.pdf;

I have issued or will issue Notices of Depositions in Lake County Case No. 35-2019-CA-1871 for many of you receiving this email if you lived at Coach Houses in March 2019, including current and former owners of condos at Coach Houses, Sentry and people currently or formerly with Sentry, Clayton & McCulloh and people currently or formerly with Clayton & McCulloh, DBPR and people currently or formerly with DBPR. All of you have information about the lawsuit and Coach Houses. You will also receive a notice for Lake County Case No. 35-2019-CA-1528 if you lived at Coach Houses in February 2019.

If you would like to request a date, please email me at bill@billwindsor.com. If I don't hear from you, I will choose the date.

You will be subpoenaed by the Court. Attached is an example. You will be asked to produce documents in your possession, custody, or control prior to your deposition.

Your attendance at the deposition will be by court order. Check with your attorney, but I believe the subpoena has the force of a court order, and your failure to appear is likely to result in a court order of contempt and order compelling you to appear. I am not an attorney; I represent myself "pro se."

The depositions will be by Zoom, so you will need a computer device with a microphone and camera. You will be sworn in, and your testimony will be under penalty of perjury.

Please provide me with your current email address and telephone number so the court reporter can send you the Zoom link and information. Please email me with any questions.

William Michael Windsor

bill@billwindsor.com

352-577-9988

100 East Oak Terrace Drive, Unit B3

Leesburg, Florida 34748

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR LAKE COUNTY

William M. Windsor,
Plaintiff

v.

Case No. 35-2020-CA-001647

Coach Houses at Leesburg Condominium
Association, Inc.

Defendant

SUBPOENA DUCES TECUM FOR DEPOSITION

THE STATE OF FLORIDA:

TO: Marta Carbajo

YOU ARE COMMANDED to appear before a person authorized by law to take
depositions via ZOOM.

The deposition will be held on March 3, 2021 at 9:00 a.m. You will be testifying in this
action, and you are to have with you at that time and place the documents on Exhibit A hereto
and shall have provided a copy of each to William M. Windsor in advance.

You are subpoenaed to appear by William M. Windsor, and unless excused from this
subpoena by William M. Windsor or the court, you must respond to this subpoena as directed.

DATE: 2/4/21

Shari Durham
DEPUTY CLERK

Name: Shari Durham



Party: William M. Windsor
Address: 100 East Oak Terrace Drive, Unit B3
Leesburg, Florida 34748
Phone: 352-805-7887
Email: bill@billwindsor.com

Any minor subpoenaed for testimony has 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 on a showing that the presence of a 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 proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact [identify applicable court personnel by name, address, and telephone number] at least 7 days before your scheduled court 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.

CERTIFICATE OF SERVICE

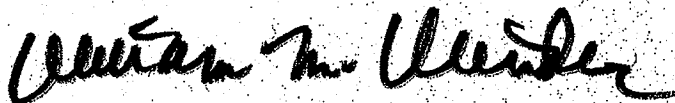
I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

Christina Bredahl Gierke
COLE, SCOTT & KISSANE, P.A.
Counsel for Board Member Defendants
Tower Place, Suite 400, 1900 Summit Tower Boulevard, Orlando, Florida 32810
Telephone 321-972-0025, Facsimile 321-972-0099
christina.gierke@csklegal.com
allison.barkett@csklegal.com, kirbie.caruso@csklegal.com

Marta Carbajo
martacarbajo@yahoo.com

This 4th day of February, 2021.



William M. Windsor

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT OF FLORIDA
IN AND FOR LAKE COUNTY**

William M. Windsor,
Plaintiff

v.

Case No. 35-2020-CA-001647

Coach Houses at Leesburg Condominium
Association, Inc.

Defendant

**PLAINTIFF'S AMENDED NOTICE OF TAKING ORAL DEPOSITION OF
MARTA CARBAJO BY ZOOM**

PLEASE TAKE NOTICE that the Plaintiff, WILLIAM M. WINDSOR, will take the
ZOOM deposition of:

NAME: Marta Carbajo

DATE AND TIME: March 3, 2021 9:00 a.m.

LOCATION: ZOOM, so wherever the named person can access a computer with a
microphone and camera.

This will be an oral examination before an officer duly authorized by law to take
depositions. The deposition is being taken for purposes of discovery, or use at trial, or for such
other purpose as is permitted under the applicable and governing Florida Rules of Civil
Procedure.

A subpoena duces tecum will be served on the person to be examined. The materials to
be produced are to be produced the day before the deposition to William M. Windsor, 100 East
Oak Terrace Drive, Unit B3, Leesburg, Florida 34748 or bill@billwindsor.com. The materials to
be produced under the subpoena are:

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to WINDSOR.
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication from WINDSOR.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication or information about WINDSOR.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about ASSOCIATION.
5. All documents relating or referring to, or evidencing, reflecting, or constituting information about purchases of condos at Coach Houses at Leesburg from 2016 to the present.
6. All documents relating or referring to, or evidencing, reflecting, or constituting information about membership in the ASSOCIATION including the ARTICLES, BYLAWS, DECLARATION, and RULES.
7. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any Defendant in Case No. 35-2020-CA-1438.
8. All documents relating or referring to, or evidencing, reflecting, or constituting information about any issue in Case No. 35-2020-CA-001647.
9. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about C&M.
10. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about DBPR and WINDSOR.
11. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about DBPR and ASSOCIATION.

12. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any current or past member of the ASSOCIATION from 2016 to the present.
13. All communications on SENTRY's website for Directors and Officers of the ASSOCIATION.
14. All documents relating or referring to, or evidencing, reflecting, or constituting meetings or discussions by purported members of the Board of the ASSOCIATION from 2016 to the present.
15. All documents relating or referring to, or evidencing, reflecting, or constituting calendars showing meetings or discussions by purported members of the Board of the ASSOCIATION from 2016 to the present.
16. All documents relating or referring to, or evidencing, reflecting, or constituting notes or documents related to meetings or discussions by purported members of the Board of the ASSOCIATION from 2016 to the present.
17. All documents relating or referring to, or evidencing, reflecting, or constituting training or educational materials about condominiums, associations, or legal work for condominiums or associations.
18. All documents relating or referring to, or evidencing, reflecting, or constituting the SENTRY website.
19. All documents relating or referring to, or evidencing, reflecting, or constituting the "Board Room" on SENTRY'S website to include a demo of the site.

20. All documents relating or referring to, or evidencing, reflecting, or constituting anything relative to facts, issues, or causes of action in the Complaint in any legal action filed by Windsor regarding the ASSOCIATION or SENTRY.

21. All documents relating or referring to, or evidencing, reflecting, or constituting communication with or about CLAYTON & MCCULLOH, NEAL MCCULLOH, BRIAN HESS, or RUSSELL KLEMM.

I. Definitions

As used in this Request for Production of Documents ("REQUEST"), the following terms mean:

(a) "You" or "your" -- The person(s) to whom this REQUEST is addressed and all other persons acting or purporting to act on said person's behalf.

(b) "Document" -- Includes, without limitation, writings, emails (whether printed or not), agreements, contracts, and printed matter of every kind and description; data stored on a computer hard disk or other memory card, photographs and drawings; notes and records of any oral communications; e-mails and recordings (tape, disc or other) of oral communications.

(c) "Person" or "persons" -- Any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or any other entity.

(d) "Communicate" or "communication" -- Includes every manner or means of disclosure, transfer, or exchange and every disclosure, transfer or exchange of information, whether orally or by documents or whether face-to-face or by telephone, mail, personal delivery or otherwise.

(e) "Or" -- Shall be construed either conjunctively or disjunctively to bring within the scope of this REQUEST any information which might otherwise be construed to be outside their scope.

(f) "Complaint" -- The Complaint filed in the Circuit Court of the Fifth Judicial Circuit in and for Lake County, Florida assigned Case No. 35-2019-CA-001647-AXXX-XX.

(g) "Windsor" -- a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(h) "Plaintiff" -- William M. Windsor, a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(i) "Association" -- COACH HOUSES AT LEESBURG CONDOMINIUM ASSOCIATION, INC.

(j) "Bylaws" -- Bylaws of COACH HOUSES AT LEESBURG CONDOMINIUM ASSOCIATION, INC.

(k) "Articles" or "Articles of Incorporation" -- Articles of Incorporation of COACH HOUSES AT LEESBURG CONDOMINIUM ASSOCIATION, INC.

(l) "Declaration" -- Declaration of COACH HOUSES AT LEESBURG CONDOMINIUM ASSOCIATION, INC.

(m) "RULES" -- RULES of COACH HOUSES AT LEESBURG CONDOMINIUM ASSOCIATION, INC.

(n) (j) "OMAR" or "OMAR NUSEIBEH" an owner of the ASSOCIATION who has resided at 100 East Oak Terrace Drive Unit G4, Leesburg, Florida 34748.

(o) "VICKI" or "VICKI HEDRICK". She resides at 100 East Oak Terrace Drive Unit E3, Leesburg, Florida 34748.

(p) "KAREN" or "KAREN BOLLINGER". She resides at 100 East Oak Terrace Drive Unit A1, Leesburg, Florida 34748.

(q) "SHEHNEELA" or "SHEHNEELA ARSHI". She resides at 100 East Oak Terrace Drive Unit D2, Leesburg, Florida 34748.

(r) "MARTA" or "MARTA CARBAJO". She resides at 100 East Oak Terrace Drive Unit A4, Leesburg, Florida 34748.

(s) "HOWIE" or "HOWARD SOLOW". He resides at 100 East Oak Terrace Drive Unit B2, Leesburg, Florida 34748.

(t) "ISABEL" or "ISABEL CAMPBELL". She owns the condominium at 100 East Oak Terrace Drive Unit F2, Leesburg, Florida 34748.

(u) "SERGIO" or "SERGIO NAUMOFF". He resides at 100 East Oak Terrace Drive Unit F3, Leesburg, Florida 34748.

(v) "ED" or "ED BROOM, JR.". He resides at 100 East Oak Terrace Drive Unit B1, Leesburg, Florida 34748.

(w) "SUE" or "SUE YOKLEY". She resides at 100 East Oak Terrace Drive Unit C3, Leesburg, Florida 34748.

(x) "WENDY" or "WENDY KRAUSS". She resides at 100 East Oak Terrace Drive Unit E4, Leesburg, Florida 34748.

(y) "SENTRY" or "SENTRY MANAGEMENT, INC." is the management company for the ASSOCIATION in Lake County, Florida.

(z) "CHARLIE ANN" or "CHARLIE ANN ALDRIDGE" is an employee or former employee of SENTRY.

(aa) "BRAD" or "BRAD POMP" is an employee of SENTRY.

- (bb) "ART" or "ART SWANTON" is an employee or former employee of SENTRY.
- (cc) "C&M" or "CLAYTON & McCULLOH, P.A." is the law firm representing the ASSOCIATION.
- (dd) "HESS" or "BRIAN HESS" is an employee of C&M who is representing the ASSOCIATION.
- (ee) "McCULLOH" or "NEAL McCULLOH" is an employee of C&M who is representing the ASSOCIATION.
- (ff) "KLEMM" or "RUSSELL KLEMM" is an employee of C&M who is representing the ASSOCIATION.
- (gg) "DBPR" or "FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION" is the state entity that manages condominium developments.
- (hh) "MAHLON" or "RHANEY" or "MAHLON C. RHANEY" is an employee of DBPR.
- (ii) "LEAH" or "SIMMS" or "LEAH SIMMS" is an employee of DBPR.
- (jj) "DOES" are other owners of the ASSOCIATION who reside at 100 East Oak Terrace Drive, Leesburg, Florida 34748.

Dated in Leesburg, Florida this 4th day of February, 2021,

William M. Windsor
Pro Se

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

Christina Bredahl Gierke
COLE, SCOTT & KISSANE, P.A.
Counsel for Board Member Defendants
Tower Place, Suite 400, 1900 Summit Tower Boulevard, Orlando, Florida 32810
Telephone 321-972-0025, Facsimile 321-972-0099
christina.gierke@csklegal.com
allison.barkett@csklegal.com, kirbie.caruso@csklegal.com

Marta Carbajo
martacarbajo@yahoo.com

This 4th day of February, 2021.



William M. Windsor