

EXHIBIT

2358

**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-AXXX-XX

Coach Houses at Leesburg Condominium
Association, Inc.,

Defendant

MOTION FOR CIVIL CONTEMPT AND ENFORCEMENT

William M. Windsor (“Windsor”) files this Motion for Contempt pursuant to Florida Rules of Civil Procedure Rule 1.410, Florida Rules of Judicial Administration Rule 2.516, and the Court’s Inherent Powers. Windsor shows the Court as follows:

1. Isabel Campbell failed to appear for the deposition she was commanded to attend by a Subpoena Duces Tecum signed and issued by the Clerk of Court. [EXHIBIT 2287.]

2. Isabel Campbell was served multiple times in multiple ways.

3. Isabel Campbell has willfully failed to comply with this Order.

4. Windsor references and incorporates herein his “**VERIFIED RESPONSE TO COACH HOUSES AT LEESBURG CONDOMINIUM**”

ASSOCIATION, INC'S EMERGENCY MOTION FOR PROTECTIVE ORDER,
MOTION TO STRIKE DEPOSITION NOTICES, AND INCORPORATED
MEMORANDUM OF LAW; AND PLAINTIFF'S MOTION FOR SANCTIONS"
filed 2/8/2021.

5. Florida Rules of Civil Procedure Rule 1.410 (f) provides for contempt: "Failure by any person without adequate excuse to obey a subpoena served on that person may be deemed a contempt of the court from which the subpoena issued."

6. Isabel Campbell was warned of this, and she violated the law and the Rules by failing to attend.

7. Isabel Campbell did not file a motion for a protective order.

8. Christina Gierke advised Isabel Campbell, who is not her client, to refuse to attend the deposition.

WHEREFORE, Windsor respectfully requests that the Court do as follows:

- a. grant this Motion;
- b. issue an order finding Isabel Campbell in civil contempt;
- c. issue an order finding Christina Gierke in civil contempt;
- d. issue an order for a compensatory fine;
- e. issue an order of a coercive fine;
- f. issue an order incarcerating Isabel Campbell with a purge;
- g. issue an order sanctioning Isabel Campbell and Christina Gierke;

- h. issue an order compelling Isabel Campbell to produce the documents requested in the Subpoena Duces Tecum without objection, and provide each response in a separate envelope marked as to which request it responds;
- i. issue an order compelling Isabel Campbell and the Defendant to produce all documents requested in this case without objection, and provide each response in a separate envelope marked as to which request it responds;
- j. issue an order compelling Isabel Campbell to appear for a deposition without objection on February 13, 2020;
- k. issue an order warning Isabel Campbell that her failure to appear for this deposition will be considered criminal contempt;
- l. issue an order denying Isabel Campbell the ability to testify or offer any evidence in this matter; and
- m. grant such other relief as the Court deems appropriate.

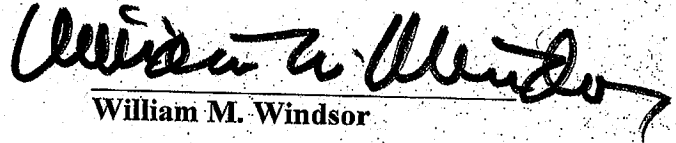
This 9th day of February, 2021,


William M. Windsor

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 9th day of February, 2021,


William M. Windsor

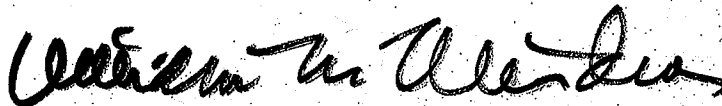
CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Motion for Contempt
by efile email:

Christina Bredahl Gierke
COLE, SCOTT & KISSANE, P.A.
Counsel for Board Member Defendants
Tower Place, Suite 400, 1900 Summit Tower Boulevard, Orlando, Florida 32810
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allison.barkett@csklegal.com, kirbie.caruso@csklegal.com

ISABEL CAMPBELL
isabelmcampbell@gmail.com; Isabel.campbell.coachhouses@gmail.com

This 9th day of February, 2021,



William M. Windsor
100 East Oak Terrace Drive, Unit B3
Leesburg, Florida 34748
352-577-9988
bill@billwindsor.com
billwindsor1@outlook.com

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

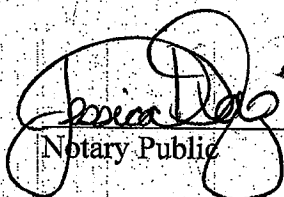
I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 10th day of February, 2021,



William M. Windsor

Sworn and subscribed before me this 10th day of February, 2021, by means of physical presence.



Notary Public

