

EXHIBIT


2362

Deposition of Omar

William Michael Windsor <billwindsor1@outlook.com>

Sat 2/13/2021 9:58 AM

To: Omar Nuseibeh <omar@netmdi.com>; rklemm@clayton-mcculloh.com <rklemm@clayton-mcculloh.com>; Christine Praria <cpraria@clayton-mcculloh.com>

 1 attachments (864 KB)

2019-CA-1528-Notice-of-Deposition-Omar-Nuseibeh-2021-02-13.pdf;

Deposition of Omar

William Michael Windsor

billwindsor1@outlook.com

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

William M. Windsor,
Plaintiff

v.

Case No. 35-2019-CA-001528

Coach Houses at Leesburg Condominium
Association, Inc.

Defendant

**PLAINTIFF'S NOTICE OF TAKING ORAL DEPOSITION OF
OMAR NUSEIBEH BY ZOOM**

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

NAME: Omar Nuseibeh

DATE AND TIME: March 3, 2021 12:00 noon.

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 Omar Nuseibeh. 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. Omar Nuseibeh must
produce each separate item requested for production in a file folder marked to show the date

requested and the item number of the request. Omar Nuseibeh must comply with Florida Rules of Civil Procedure Rule 1.280(B) (6) if making a claim of privilege; any such claim must describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection

The materials to be produced under the subpoena are:

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to WINDSOR, including emails.
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication from WINDSOR, including emails.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any issue in Case No. 35-2019-CA-001528.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any issue in Case No. 35-2019-CA-001871.
5. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any issue in Case No. 35-2020-CA-001438.
6. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about any issue in Case No. 35-2020-CA-001647.
7. All documents relating or referring to, or evidencing, reflecting, or constituting training or educational materials about condominiums.
8. All documents relating or referring to, or evidencing, reflecting, or constituting training or educational materials about associations.

9. All documents relating or referring to, or evidencing, reflecting, or constituting training or educational materials about legal work for condominiums or associations.
10. All documents relating or referring to, or evidencing, reflecting, or constituting training or educational materials or tests about Florida Board Member Certification.
11. All documents relating or referring to, or evidencing, reflecting, or constituting communication or information about WINDSOR.
12. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about ASSOCIATION.
13. 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.
14. All documents relating or referring to, or evidencing, reflecting, or constituting information about membership in the ASSOCIATION including the ARTICLES, BYLAWS, DECLARATION, and RULES.
15. All documents relating or referring to, or evidencing, reflecting, or constituting your cell phone number.
16. All documents relating or referring to, or evidencing, reflecting, or constituting your addresses where you sleep.
17. All documents relating or referring to, or evidencing, reflecting, or constituting information about your purchase of a condo at Coach Houses. This should include your Deed.
18. 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.
19. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about C&M.

20. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about DBPR and WINDSOR.

21. All documents relating or referring to, or evidencing, reflecting, or constituting communication to, from, or about DBPR and ASSOCIATION.

22. 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.

23. All communications on SENTRY's website for Directors and Officers of the ASSOCIATION.

24. 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.

25. 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.

26. 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.

27. 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.

28. All documents relating or referring to, or evidencing, reflecting, or constituting the SENTRY website.

29. 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.

30. 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.

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

32. All documents relating or referring to, or evidencing, reflecting, or constituting your drivers' license.

33. All documents relating or referring to, or evidencing, reflecting, or constituting your passport.

34. All documents relating or referring to, or evidencing, reflecting, or constituting licenses or permits for guns or weapons of any type.

35. Proof of election as an Officer of the ASSOCIATION.

36. Proof of election as a Director of the ASSOCIATION.

37. All communications on SENTRY's website for Directors and Officers of the ASSOCIATION.

38. All documents relating or referring to, or evidencing, reflecting, or constituting meetings or discussions by purported members of the Board of the ASSOCIATION.

39. 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.

40. 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.

41. All documents relating or referring to, or evidencing, reflecting, or constituting anything relative to facts, issues, or causes of action in the Complaint.

42. Contents from Correspondence Folder in CH referenced in EXHIBIT 2067 hereto, produced on the Flash Drive provided by the Coach Houses at Leesburg Condominium Association, Inc. on December 29, 2020.

43. Contents from Manager Notebook referenced in EXHIBIT 2067 hereto, produced on the Flash Drive provided by the Coach Houses at Leesburg Condominium Association, Inc. on December 29, 2020.

44. 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 13th 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:

Russell E. Klemm
Clayton & McCulloh
1065 Maitland Center Commons Boulevard
Maitland, Florida 32751
rklemm@clayton-mcculloh.com
cpraria@clayton-mcculloh.com

Omar Nuseibeh
omar@netmdi.com

This 13th day of February, 2021.



William M. Windsor

Exhibit

2067

Archived: Wednesday, March 25, 2020 1:48:49 PM
From: Charlie Ann Aldridge
Sent: Friday, March 20, 2020 2:08:36 PM
To: Jennifer Myles
Cc: Katie Ciccotelli
Subject: FW: Manager's log
Response requested: No
Sensitivity: Normal

Please upload the email below, to the correspondence folder in CH, 003120.

Thank you.

Respectfully,

Click [here](#) for Sentry Management's office support team availability in response to COVID-19
Click [here](#) for the message from Brad Pomp, President-Sentry Management



Charlie Ann Aldridge, LCAM, CPM, FL RE License
Community Association Manager
Sentry Management Inc
1928 Salk Ave
Tavares FL 32778
352-343-5706 ext 58010
352-343-5123 (fax)
www.sentrymgt.com

From: Isabel Campbell <isabel.campbell.coachhouses@gmail.com>
Sent: Wednesday, March 18, 2020 5:30 PM
To: Charlie Ann Aldridge <caldrige@sentrymgt.com>
Cc: Katie Ciccotelli <kciccotelli@sentrymgt.com>; sergio naumoff <serghouse55@gmail.com>; Wendy Krauss <wkcoachhousecondo@yahoo.com>;
howso1@aol.com; Sue Yokley <kniworthyorknot@gmail.com>; Edward Broom Jr. <boardebroomjr@outlook.com>
Subject: Re: Manager's log

Charlie Ann: Thanks for updating your manager notebook with owners comments regarding my conversation with Edward.

I would like you to note in your entry that I expressed my disappointment to Edward regarding his service based on the condition of the grounds. I noted the encumbering tree near building A which was suppose to be taken care of weeks prior as well as the pruning of crepe myrtles (Edward informed me that his trailer was in the shop, I asked next time there is a delay I would appreciate an email so when I am approached by an owner regarding an issue, I am able to respond...he agreed), the empty plastic water bottles underneath bushes (he said he would have his crew pick them up), the scattered dead branches in the hedge beds (he said he would have his crew pick them up), the random cement scattered throughout the property which his crew mows over week in and week out (he said he did not know if he should pick them up), the numerous dead stumps left standing (he said he would take care of them), the continuous cutting of cable lines (he said he would tell his crew to be more careful and that the cable company should pay for that), and a few other items.

The sheer volume of items is due to the property not being walked through for a long time.

Please be advised on the 10th of this month I asked Edward to send a proposal for clean up work on two trees, clean up of all the scattered cement, and repair to the sunken and broken ground drains which are a liability to the association. I asked him if he did mulch which he replied he did. I also asked Edward to copy me on all emails between the two of you.

I have not received an email proposal.

Regards,
Isabel

On Wed, Mar 18, 2020 at 3:35 PM Isabel Campbell <isabel.campbell.coachhouses@gmail.com> wrote:

Charlie Ann: May I also provide information in the Manager's log?

Thanks,

Isabel

On Wed, Mar 18, 2020 at 3:33 PM Isabel Campbell <isabel.campbell.coachhouses@gmail.com> wrote:

Charlie Ann: You are right. I will read the entries...no need to duplicate.

Thanks,
Isabel

On Wed, Mar 18, 2020 at 3:11 PM Charlie Ann Aldridge <caldridge@sentrymgt.com> wrote:

Isabel:

That is why we have the managers notebook. It is a communication tool that allows the BOD to see what is taking place re: your association, in real time, so that we do not have to duplicate communication.

I did receive another call re: that incident with the landscaper and they too advised that the landscaper had to ask you to calm down in order to have a civil conversation.

I just have not had the opportunity to update that entry.

Respectfully,



Charlie Ann Aldridge, LCAM, CPM, FL RE License
Community Association Manager
Sentry Management Inc
1928 Salk Ave
Tavares FL 32778
352-343-5708 ext 58010
352-343-5123 (fax)
www.sentrymgt.com

From: Isabel Campbell <isabel.campbell.coachhouses@gmail.com>

Sent: Wednesday, March 18, 2020 1:05 PM

To: Charlie Ann Aldridge <caldridge@sentrymgt.com>; Katie Ciccotelli <kciccotelli@sentrymgt.com>; sergio naumoff <serghouse55@gmail.com>; Wendy Krauss <wkcoachhousecondo@yahoo.com>; howso1@aol.com; Sue Yokley <knitworthyorknot@gmail.com>; Edward Broom Jr. <boardedbroomjr@outlook.com>

Subject: Manager's log

Charlie Ann: The next time you get a phone call from a homeowner stating I was yelling or being rude to someone, please relay such information to me. I do not need you to disclose who the individual is but I should be made aware of accusations against me which are being entered by you in our manager notebook.

Regards,
Isabel