

March 2, 2010

JANE DOE 2 - [REDACTED] DOB - [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

• **Immediate Issues:**

1. Plaintiff's depo on 3/3/10
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

• **Future Issues**

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

• **Discovery to do/outstanding (to and from)**

1. Depo of Dr. Agresti and Kathy Sloan
2. Depo of Lisa and Thomas Moreland
3. Depo of Cody Moreland (assaulted [REDACTED])
4. Records from Dr. Reed.
5. Kliman – report and depo

March 2, 2010

JANE DOE 3 – [REDACTED] DOB – [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

• Immediate Issues:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

• Future Issues

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

• Discovery to do/outstanding (to and from)

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. Dad
5. [REDACTED] – [REDACTED]
6. [REDACTED] (not a Plaintiff)
7. [REDACTED] knows what [REDACTED] did
8. [REDACTED]
9. [REDACTED] – get employment records? May fire?
10. Dr. Kassover
11. Dr. Karrum
12. [REDACTED] (NO) no mention of JE until after lawsuit?

JANE DOE 4 – [REDACTED] DOB – [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

• **Immediate Issues:**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

• **Future Issues**

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

• **Discovery to do/outstanding (to and from)**

1. Depos – [REDACTED]
2. [REDACTED] – Tampa ([REDACTED])
3. Friends – MTL?
4. Depose [REDACTED] Boston
5. Records [REDACTED]
6. Kliman – report and depo
7. Get her written statements – [REDACTED] Police – Depose Cop?

March 2, 2010

NEED MTL'S INPUT

JANE DOE 5 – [REDACTED] DOB [REDACTED]
TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

• **Immediate Issues:**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

• **Future Issues**

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

• **Discovery to do/outstanding (to and from)**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

March 2, 2010

JANE DOE 6 - [REDACTED] DOB - [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

- **Immediate Issues:**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

- **Future Issues**

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents (Jess – check Facebook Yolilopez)
4. Limitation on Punitive Damages

- **Discovery to do/outstanding (to and from)**

1. Depo of [REDACTED]
2. N. Alvarez (Mon – [REDACTED] and letter)
3. Melissa Kapusta (Tampa) – find
4. [REDACTED] – as witness
5. Dr. Jonathon Greenfield, WPB (Columbia)
6. Focus – Bollinger (Ph.D) or de Castro LMHC
7. Kliman – report and depo

March 2, 2010

JANE DOE 7 – [REDACTED] DOB – [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/12/10

- **Immediate Issues:**

1. Deposition set 3/15/10.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

- **Future Issues**

1. Motions for S/J by 5-7-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation to be completed by 7/26/10
 - a) Mediation – Romano or Buckstein
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

- **Discovery to do/outstanding (to and from)**

1. Mom
2. Dad

March 2, 2010

JANE DOE 8 - [REDACTED] DOB - [REDACTED]

TRIAL DATE: Not Set
DISCOVERY CUTOFF: No schedule

- **Immediate Issues:**

- 1.
- 2.
- 3.
- 4.
- 5.

- **Future Issues**

1. When Interrogatories and Request to Produce due back? (Received 3/2/10 – to review and request records)
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

- **Discovery to do/outstanding (to and from)**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

March 2, 2010

JANE DOE – [REDACTED] DOB – [REDACTED]

TRIAL DATE: [REDACTED]
DISCOVERY CUTOFF: 4/16/10

• **Immediate Issues:**

1. Surveillance at [REDACTED]?
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

• **Future Issues**

1. Motions for S/J by 3-5-10
 - a) single recovery and 50 k, not 150 k
 - b) No §2422(b) violation – so dismiss C III
2. Mediation set with Romano on 4/5/10 (WPB)
3. Motions in Limine – Similar incidents
4. Limitation on Punitive Damages

• **Discovery to do/outstanding (to and from)**

1. Deposing [REDACTED] on 3-5-10
2. Order to Show Cause re: Mom?; [REDACTED] (No?)
3. SR reset for 3/11/10 depo completion
4. Depose Justin Vanover
5. [REDACTED]
6. Justin Sprague and [REDACTED]
7. Melissa Kapusta
8. [REDACTED] records?
9. Update Randy Speciale

March 2, 2010

JANE DOE II (FEDERAL) - [REDACTED], DOB - [REDACTED]

TRIAL DATE:
DISCOVERY CUTOFF:

- Immediate Issues:

1. [REDACTED]
- 2.
- 3.
- 4.
- 5.

- Future Issues

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

- Discovery to do/outstanding (to and from)

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

March 2, 2010

JANE DOE II (STATE) – [REDACTED], DOB – [REDACTED]

TRIAL DATE:
DISCOVERY CUTOFF:

- Immediate Issues:

1. None – exchanged Scheduling Order
- 2.
- 3.
- 4.
- 5.
- 6.

- Future Issues

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

- Discovery to do/outstanding (to and from)

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.

March 2, 2010

JANE DOE 103 - [REDACTED] DOB [REDACTED]

TRIAL DATE:
DISCOVERY CUTOFF:

- **Immediate Issues:**

1. On 3/26/10, Motion to Dismiss due.
2. What can we do in Motion – USAO letter that [REDACTED] to send 3/3/10?
- 3.
- 4.
- 5.
- 6.

- **Future Issues**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

- **Discovery to do/outstanding (to and from)**

1. Send interrogatories and request to produce
2. Schedule CME.
- 3.
- 4.
- 5.
- 6.
- 7.

March 2, 2010

DOB - [REDACTED]

TRIAL DATE:
DISCOVERY CUTOFF:

• **Immediate Issues:**

1. Noticed for trial.
2. Any additional Surveillance.
3. Get [REDACTED] mom's depo set.
4. NY guy and his friend (apt.)
- 5.
- 6.

• **Future Issues**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

• **Discovery to do/outstanding (to and from)**

1. Depose Thomas Stouder, Justin Sprague and Travers Ledge(??) & [REDACTED]
2. Amy Swan records.
3. [REDACTED]
4. Dr. Sax records – heart – Benoist Farm at Okeechobee
5. [REDACTED]
6. Find Amanda Lazlo (Reggie Rock)
7. Dr. Rischard
8. Update Randy Speciale
9. [REDACTED] – 09-10
10. Demons Cyle
11. Schwegel, Beale, Ewart
12. [REDACTED]

March 2, 2010

E.W. - [REDACTED], DOB - [REDACTED]

TRIAL DATE:
DISCOVERY CUTOFF:

• **Immediate Issues:**

1. Noticed for Trial
- 2.
- 3.
- 4.
- 5.
- 6.

• **Future Issues**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

• **Discovery to do/outstanding (to and from)**

1. Set depo (x-notice in #6, SR, LM – others?)
2. Depos – Justin Sprague, [REDACTED], Brent Moody, Hunter Sutton, Jesse Curran
3. Amy Swan
4. [REDACTED]
5. [REDACTED]
6. CARP records?
7. [REDACTED]
8. Dr. Rishad records
9. Update Randy Speciale

March 2, 2010

B.B., [REDACTED], DOB – [REDACTED]

TRIAL DATE: None
DISCOVERY CUTOFF: None

- **Immediate Issues:**

1. Contact Mitch (Jack)
- 2.
- 3.
- 4.
- 5.
- 6.

- **Future Issues**

1. Motion to add RICO – Move to Dismiss (57.105?)
2. Motion to add Claim for punitive damages
- 3.
- 4.
- 5.
- 6.

- **Discovery to do/outstanding (to and from)**

1. Plaintiff's depo
2. Family member
- 3.
- 4.
- 5.
- 6.
- 7.

March 2, 2010

EPSTEIN V. ROTHSTEIN

TRIAL DATE: None
DISCOVERY CUTOFF: None

• **Immediate Issues:**

1. Prepare for JE Depo, 3/17/10 at 10:00 a.m.
2. Prepare for Brad on 3/23/10 at 10:00 a.m.
3. Get Stettin to
4. Serve new subpoena
5. Set DiScala
6. Set Fisten
7. Set Jenne
8. Set Beckman

• **Future Issues**

1. Get e-mail traffic (atty/clt/with privilege)
- 2.
- 3.
- 4.
- 5.

• **Discovery to do/outstanding (to and from)**

1. New subpoena
2. New Request to Produce
- 3.
- 4.
- 5.

March 2, 2010

JOSEFSBERG – BILLING ISSUES

TRIAL DATE: None
DISCOVERY CUTOFF: None

• **Immediate Issues:**

1. Meeting in Miami on 3/12/10; what is plan/objective for meeting; need any prep?
2. Letter to USAO – what can we do or not do?
- 3.
- 4.
- 5.

• **Future Issues**

1. Hire Shawn Michael (legal scrubber) to examine bills (Cost?; contingency/hourly)
2. Expert (Ed Blumenthal – Coleman’s friend – former Fla. Bar president; plaintiff’s attorney – great credentials; Miami atty.?)
- 3.
- 4.
- 5.

• **Discovery to do/outstanding (to and from)**

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.