

**IN THE CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA**

KENNETH MANFREDI, SR.,
KENNETH MANFREDI, JR.,
and ALEXANDER LIEBSTER as Trustee
For the Estate of Ernesto Liebster

Plaintiffs,

CASE NO. 13-024268-CA 01

v.

KOBALTEK, INC, an inactive Florida Corporation,
MILLENIU LOCK INC. d/b/a ULTIMATE
LOCK SYSTEMS, a Texas Corporation; DARREN
BAYSINGER, individually; RON DANIELS,
individually; and Joseph Titone, individually,

Defendants.

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**DEFENDANT JOSEPH TITONE'S RESPONSE TO PLAINTIFFS' REQUEST FOR
PRODUCTION**

COMES NOW Defendants Joseph Titone, by and through undersigned counsel, and files this
Response to Plaintiffs' Request for Production, and states as follows:

1. Objection – any and all documents requested for Joe Titone, who was the attorney for Defendant Kobaltek, Inc., are confidential and privileged as attorney-client communications.
2. Objection – same
3. Objection – same
4. Objection – same
5. Objection – same
6. Objection – same

7. Objection – same
8. Objection – same
9. Objection – same
10. Objection – same
11. Objection – same
12. Objection – same

/s/ Joe Titone

Joe Titone
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/s/ Steve Mankodi

Steve Mankodi
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[REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served on June 12, 2014 upon George C. Paladis, Esq., & Michael J. Reppas, Esq., Law Office of Michael J. Reppas, [REDACTED], 7850 NW 146TH Street, Suite 501, Miami Lakes, Florida 33016.