

**IN THE CIRCUIT COURT OF THE 18TH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY, FLORIDA**

SUNWOOD, INC.,

Case #: 05-2019-CA-0XXXX

Plaintiff,

v.

DOE INVESTMENTS, LLC,  
OLGA A. DOE, AND ALL PERSONS  
IN POSSESSION AT ABC Lane  
DRIVE, TITUSVILLE, FLORIDA,

Defendants.

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**DEFENDANT DOE INVESTMENTS, LLC  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF  
SUNWOOD, INC.**

COMES NOW the Defendant, Doe Investments, Inc., by and through the undersigned attorney, and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, requests that Plaintiff produce and permit Defendant to inspect and photocopy the documents listed below within the terms prescribed by the Rules of Civil Procedure.

In response to this Request for Production of Documents, Plaintiff may provide Defendant with copies of the documents requested herein. **Electronic copies of the documents requested are preferred.**

**DEFINITIONS**

1. The term "Plaintiff" means the Plaintiffs named herein (i.e., the current Plaintiffs and all previous parties that were previously the Plaintiff in this case), including its agents, servants, employees, attorneys, expert witnesses, accountants, auditors, and all other persons over whom it has control or authority or who have been hired, retained or employed for any purpose by it.

2. The term "Defendant" means the Defendant, Doe Investments, LLC, including its agents, servants, employees, attorneys, expert witnesses, accountants, auditors, and all other persons over whom he/she has control or authority or who have been hired, retained or employed for any purpose by him/her.

3. The term "document" or "documents" includes, without limitation, any written, printed, typed, recorded or graphic matter of every type and description, all writings, letters, papers, minutes, bulletins, correspondence, emails, telegrams, cablegrams, facsimiles, memoranda, notes, diaries, logs, instructions, literature, work assignments, schedules, notebooks, records, agreements, affidavits, statements, contracts, notations of telephone or personal conversations or conferences, address books, interoffice communications, receipts, tabulations, vouchers, accounts, microfilm, circulars, pamphlets, advertisements, catalogues, studies, abstracts, notices, summaries, reports, books, invoices, checks, bills, graphs, photographs, slides, drawings, motion pictures, videotapes, photographic matter or sound reproduction, any data compilation maintained on electronic data processing equipment and any printouts or other reproductions of such data compilations, computer data sheets, computer data compilations, work sheets, calendars, statistics, speeches and other writings, tape recordings, transcripts of tape recordings, phonograph records, data compilations from which information can be obtained or can be translated through detection into reasonably usable form, or any other tangible thing from which information or knowledge can be obtained.

4. The term "relating to" means concerning, respecting, referring to, relevant to, summarizing, digesting, documenting, recording, noting, containing, embodying, reflecting, identifying, establishing, tending to establish, evidencing, supporting, compromising, connected with, commonly known as, responding to, agreeing or disagreeing with, showing, describing, discussing, mentioning, analyzing, representing, constituting or including.

5. The term "person" means any individual or entity, including associations, companies, partnerships, firms, joint ventures, corporations, public agencies, departments, bureaus, boards or any other private, government or legal entity.

6. The term "communication" means any contact, oral or written, formal or informal, whether in person, in writing, by telephone, or by any other method, whereby knowledge, facts, or information was imparted from one person or entity to another or to a file. It shall include, without limitation, information sent or received by you.

7. The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.

8. The term "Subject Property" refers to the real property which is the subject of this foreclosure action.

### **INSTRUCTIONS**

9. Your response to this request for production shall include all documents and information within your possession, custody or control, including, but not limited to, documents and information in the possession, custody or control of any of your employees, accountants, consultants, attorneys, or other agents or representatives.

10. The documents produced for inspection pursuant to this request shall be produced either as they are kept in the usual course of business by you or you shall organize and label the documents to correspond with the individually numbered categories of this request.

11. As used herein, whenever documents relating to "your communication" are requested, the request shall be considered to include within its meaning all documents relating to communication between the identified persons, whether sent or received.

12. You need not produce original documents. Production of an accurate copy of an original document shall comply with this request. If the document being requested is stored electronically, produce an electronic copy of the document in the file format in which it is stored, including all metadata, so long as the file format is readable by Microsoft Office programs, or Corel WordPerfect programs. For file formats not readable by, Microsoft Office programs, or Corel WordPerfect programs produce the document in pdf format. Produce scanned copies of physical documents that are not electronically stored. Call before making any copies because we will not reimburse any copy costs incurred prior to our pre- authorization.

13. Unless otherwise specified, the time period covered by this request shall be from the inception of the subject loan/mortgage.

14. If any document or portion thereof is or will be withheld because of a claim of privilege or for any other reason, provide a list of such document(s) or portion(s) thereof showing, as to each item not produced, information adequate to identify the document and the basis of your claim of privilege adequate to describe the document with sufficient particularity to support a motion to compel or for in camera inspection. Generally, such identification should include:

- a) All reasons why such document is not being produced;
- b) The author(s), recipient(s), and addressee(s);
- c) Each person to whom the original or a copy thereof was sent or delivered, and any others who at any time possessed the document or a copy thereof;
- d) The date or approximate date of the document;
- e) The general subject matter of the document or portion thereof for which privilege is claimed; and
- f) The type of document (e.g., memorandum, report, draft, letter, etc.).

15. These requests are continuing in nature and effect, to the extent provided in the applicable rules and require supplementary production concerning any documents falling within the scope

of these requests that may come into the knowledge, custody, control or possession subsequent to its response hereto.

**16. The time period for the requested documents is from January 1, 2018 through May 15, 2018. No documentation is sought for the time period on or after May 16, 2018.**

**DOCUMENTS REQUESTED:**

19. Please provide a complete copy of your entire file, including digitally stored documents and E-Mails from all parties/entities involved, related to Olga Doe and Doe INVESTMENTS, LLC's mortgage loan application, review, approval and issuance for the property located at ABC Lane Drive, Titusville, Florida 32796 including:

- a. All mortgage loan application(s) made by Olga Doe;
- b. All mortgage loan application(s) made by Doe Investments, LLC;
- c. All credit report applications for the credit file of Olga Doe;
- d. All credit reports received for the credit file of Olga Doe;
- e. All credit report applications for the credit file of Doe Investments, LLC;
- f. All credit reports received for the credit file of Doe Investments, LLC;
- g. All credit worthiness decisions made based upon the application and credit reports of Olga Doe;
- h. All credit worthiness decisions made based upon the application and credit reports of Doe Investments, LLC;
- i. All written documents evidencing why Olga Doe was denied a residential mortgage;
- j. All written documents concerning the decision to issue a commercial loan on this residential property;
- k. All written documents evidencing a request directed to Olga Doe to create Doe Investments, LLC;
- l. All written documents evidencing authorization from Olga Doe to create Doe Investments, LLC;
- m. All written documents evidencing the identify of the party who drafted documents for the creation of Doe Investments, LLC;
- n. All written documents evidencing the identification of the party who submitted documents for the creation of Doe Investments, LLC to the State of Florida;
- o. All written documents evidencing the identity of the party(s) who made payment for the creation of Doe Investments, LLC;
- p. All written documents evidencing the identity of the party(s) who received payment for the creation of Doe Investments, LLC;

- q. All written documents evidencing all invoice(s) from attorney Dane Stanish;
- r. All communications and documents sent to and from attorney Dane Stanish;
- s. All communications and documents sent to and from GST Title & Trust, Inc.;
- t. All communications and documents sent to and from Sunwood, Inc.;
- u. All communications and documents sent to and from Madera Investments; and,
- v. All communications and documents sent to and from ALC Lending.

Note: The HUD-1 Settlement Statement related to the loan is attached hereto as Exhibit "A".

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been furnished by email this 20th day of July, 2020 to:

Dane T. Stanish, 3475 Sheridan Street, Suite 209, Hollywood, FL. 33021  
[stanishd@gmail.com](mailto:stanishd@gmail.com)

Evan Plotka, 3837 Hollywood Boulevard Dane T. Stanish, 3475 Sheridan Street,  
Suite 209, Hollywood, FL. 33021 [pleadings@plotkalaw.com](mailto:pleadings@plotkalaw.com)

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