

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

JOSE LUIS PEREZ and IRINA PEREZ, his
wife.

CIVIL DIVISION

Plaintiff(s).

CASE NO: 08-10517 CA 08

v.

ERIKA PALMER, YVETTE PALMER, and
FRANK PALMER,

Defendant(s).

**PLAINTIFF'S NOTICE OF SERVING SURVEILLANCE INTERROGATORIES TO
DEFENDANT**

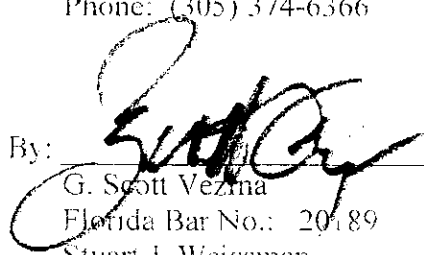
The Plaintiff, JOSE LUIS PEREZ, hereby give notice of serving Surveillance Interrogatories on the Defendant, ERIKA PALMER to be answered within thirty (30) days from service of the Interrogatories.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail and Facsimile this 28 day of April, 2010 to the attached Service List:

RATZAN & RUBIO, P.A.
Attorneys for Plaintiffs
200 South Biscayne Blvd.
54th Floor
Miami, FL 33131
Phone: (305) 374-6366

By: _____


G. Scott Vezina
Florida Bar No.: 20189
Stuart J. Weissman
Florida Bar No.: 57909

SERVICE LIST

Peter J. Oppenheimer
Marlow Connell et al
Attorney For: Erika Palmer, Yvette Palmer & Frank Palmer
4000 Ponce de Leon Blvd.
Suite 570
Coral Gables, Fl 33146
Phone: (305) 446-0500
Fax: (305) 446-3667

Lane Abraham
Attorney For: Jose Luis Perez & Irina Perez
2701 South Bayshore Drive
Suite 403
Coconut Grove, Fl 33133
Phone: (305) 285-8822
Fax: (305) 285-1662

SURVEILLANCE INTERROGATORIES TO DEFENDANT

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

- I. Are you, your agents, or attorneys aware of the existence of any surveillance films, video tapes, or photographs of the Plaintiff. See Dodson v. Persell, 590 So. 2d 704 (Fla. 1980).

ANSWER:

- A. If so, please describe the nature and subject matter of this material.

ANSWER:

- B. Do you or your attorneys intend to present any surveillance films or materials at trial either for substantive, corroborative, or impeachment purposes.

ANSWER:

- C. State name, employer and address of all persons conducting the surveillance.

ANSWER:

[SIGNATURE]

STATE OF Florida

COUNTY OF _____

Before me, the undersigned authority, personally appeared _____, who is personally known to me or who has produced _____ as identification and after being duly sworn, deposes and says that the above matters contained in the answers to interrogatories are true and correct to the best of his/her information and belief.

Sworn to and subscribed before me this ____ day of _____ 2010.

Notary Public, State of _____
My Commission Expires: _____

TRANSACTION REPORT

P. 01

APR-28-2010 WED 03:43 PM

FOR: Ratzan & Rubio, P.A. 3053746755

SEND

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RATZAN & RUBIO, P.A. Attorneys for Plaintiffs 200 South Biscayne Blvd. 54th Floor Miami, FL 33131 Phone: (305) 374-6366

By: [Signature] G. Scott Verina Florida Bar No.: 20189 Stuart J. Weissman Florida Bar No.: 57909