

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 2023-CA-001432

**CHENEY BROS., INC.,
a Florida Corporation,**

Plaintiff,

vs.

WESLEY RICHARDS,

Defendant.

PLAINTIFF'S SECOND REQUEST TO PRODUCE TO DEFENDANT

Plaintiff, CHENEY BROS., INC. ("CBI"), by and through its undersigned attorneys, pursuant to Rule 1.350, Florida Rules of Civil Procedure, requests Defendant, WESLEY RICHARDS, to produce the following documents at the offices of the undersigned counsel for inspection and/or copying within the time specified by the aforementioned Rule and Rule 1.090(e), Florida Rules of Civil Procedure, or at such other place and time as may be agreed upon by counsel:

Definitions

- A. The terms "document" and "documentation" are defined, in addition to their common meanings, as the original or any copy, electronic copy, excerpt, photocopy, or facsimile of all written, printed, typed, recorded, or graphic matter, photographic matter, and sound reproduction of tapes or other devices, however produced or reproduced, in the actual or constructive possession, custody, or control of the party or party's representative, which documents include, but are not limited to, letters, telegrams, memoranda, reports, studies, calendars of daily entries, minutes, pamphlets, notes, charts, tabulations, and records of meetings, conferences, and telephone or other conversations or communications.
- B. The term "you" means the person(s), corporation(s), or other entities to which this Request is directed.
- C. The term "correspondence" means any letter, memorandum, note, on paper or stored electronically, including emails, reflecting or constituting a communication between two

(2) people or among more than two (2) people.

Documents Requested

1. Any and all correspondence between you and any head hunters/recruiters (2018-2023).
2. Any and all correspondence between you and any prospective employers (2018-2023).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-portal this 31st day of May, 2023, to: Beth Coke, Esq., Coke Employment Law, 131 N. 2nd Street,, Suite 204, Fort Pierce, FL 34950 (beth@cokeemploymentlaw.com).

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