

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.

NOTICE OF TAKING DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the undersigned attorneys will take the deposition of:

DEPONENT	DATE	TIME	PLACE
Wesley Richards	Tuesday, July 18, 2023	10:00 a.m.	Wyland & Tadros, LLP 2505 Metrocentre Boulevard 2 nd Floor West Palm Beach, FL 33407

The witness is directed to bring with them the documents outlined in Exhibit "A" attached hereto.

upon oral examination before Lawyers' Reporting, Notary Public or other office authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under applicable Florida Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-portal this 23rd day of June, 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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BY: /s/Charles Andrew Tharp
DAVID S. TADROS, ESQ.
FBN 956015
CHARLES ANDREW THARP, ESQ.
FBN 0746134

NOT A CERTIFIED COPY

Exhibit A

1. Any and all correspondence between you and CBI related to your employment with CBI (2018-2023).
2. Any and all correspondence between you and CBI related to your aircraft training and qualifications.
3. Any and all documents concerning your application for employment with CBI.
4. Any and all documents that you provided to CBI in support of your application for employment.
5. Any and all documents related to your compensation during your employment with CBI, including, but not limited to, salary, bonus, health/life/disability insurance and other benefits.
6. Any and all documents concerning your severance from CBI.
7. Any and all applications for employment with Presidential Aviation, Inc.
8. Any and all documents provided to Presidential Aviation, Inc. regarding employment and as part of the employment application.
9. Any and all correspondence with Presidential Aviation, Inc.
10. Any and all documents exchange by you with Presidential Aviation, Inc.
11. Any and all applications for employment for the years 2018 – 2023.
12. Any and all documents provided by you in support of your application for employment for the years 2018 – 2023.
13. A copy of your 2022 Resume/Curriculum Vitae.
14. A copy of your 2023 Resume/Curriculum Vitae.
15. Any and all documents provided to you by CBI necessary for you to perform your duties while employed by CBI, including, but not limited to, training manuals job descriptions, aircraft flight manuals or other documents utilized for your job.
16. Any and all copies of your current job description.

17. Any and all documents demonstrating all aircraft flight certifications held by you from 2018 to the present.
18. Any and all documents for flight or aircraft training programs you participated in from 2018 to the present.
19. Any and all documents related to your training in the Citation XLS, Citation 560.
20. Any and all documents related to your training and upgraded certification for the Citation Sovereign aircraft.
21. Any and all documents related to payment for certifications, licenses or other requirements for you to perform your duties while employed at CBI.
22. Any and all documents related to payment for your training and upgraded certification for the Citation Sovereign aircraft.
23. Any and all cell phone records for October 2022, November 2022, December 2022 and January 2022.
24. Any and all Tax Returns with supporting documents for the years 2020-2022.
25. A copy of your Pilot logbook.
26. Any and all correspondence between you and any head hunters/recruiters (2018-2023).
27. Any and all correspondence between you and any prospective employers (2018-2023).
28. Any and all correspondence between you and Thomas Allen.

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