

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
DIVISION 19

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI  
UCN: 522024CA003939XXCICI

JULIE MARCUS, in her official capacity  
as Pinellas County Supervisor of Elections, et al.,

Defendants.

**DEFENDANT JULIE MARCUS' RESPONSE TO PLAINTIFF'S FIRST REQUEST FOR  
PRODUCTION**

The Defendant, Julie Marcus (herein "Supervisor"), response to discovery requests propounded by Plaintiff, John William Liccione, on October 17, 2024, as follows:

Plaintiff makes five requests for production. The Supervisor objects to requests one through five. Defendant objects on the grounds that the request is burdensome, harassing, not reasonably limited in scope and seeks the production of materials that are not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the Request for Production seeks privileged and confidential voter information.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that the foregoing document was filed with the Clerk of the Circuit Court by using the Florida Courts E-Filing Portal and simultaneously served through the E-Portal to **JOHN WILLIAM LICCIONE, PRO SE**, Plaintiff at [jliccione@gmail.com](mailto:jliccione@gmail.com), **GEORGE A.D. THURLOW, ESQ.**, Attorney for Defendant **JENNIFER GRIFFITH**, at [gthurlow@rahdertlaw.com](mailto:gthurlow@rahdertlaw.com), [tmccreary@rahdertlaw.com](mailto:tmccreary@rahdertlaw.com) and [service@rahdertlaw.com](mailto:service@rahdertlaw.com), and

**JAMES B. LAKE, ESQ.**, Attorney for Defendant **CATHY SALUSTRI LOPER**, at [jlake@tlolawfirm.com](mailto:jlake@tlolawfirm.com) and [tgilley@tlolawfirm.com](mailto:tgilley@tlolawfirm.com) on the 28<sup>th</sup> day of October 2024.

/s/ **Kirby Z. Kreider**

KIRBY Z. KREIDER

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Attorney for Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections.

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