

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

JOHN WILLIAM LICCIONE,

Plaintiff,

v.

Case No.: 24-003939-CI

JULIE MARCUS, et al.,

Defendants.

**DEFENDANT CATHY SALUSTRI LOPER'S
OBJECTION AND RESPONSE TO REQUEST FOR PRODUCTION AND
RESPONSE TO MOTION TO COMPEL DISCOVERY**

Pursuant to Florida Rule of Civil Procedure 1.280 and 1.350, Defendant Cathy Salustri Loper ("Loper") responds to Plaintiff's First Request for Production of Documents (filed Oct. 19, 2024) and Motion to Compel Discovery (filed Oct. 29, 2024) as follows:

1. Loper objects to Plaintiff's First Request for Production if and insofar as the request seeks privileged documents, including documents obtained in the course of gathering news. *See* § 90.5015, Fla. Stat. (2023).
2. Without waiving this objection, Loper states that she has no non-privileged documents responsive to Plaintiff's First Request for Production.
3. The non-evidentiary hearing on November 12, 2024, concerns whether the Amended Complaint states a cause of action or is without merit as a matter of law. No discovery is relevant to such purely legal matters. Loper will present no evidence at the hearing and has no documents to produce in connection with the motions.
4. Discovery should be deferred until the Court determines the Plaintiff has stated a cause of action. The hearing should proceed as scheduled.

WHEREFORE, Plaintiff's motion to compel should be denied.

Respectfully submitted,

THOMAS & LOCICERO PL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 29, 2024, the foregoing document was electronically with the Clerk of the Court via the E-Portal, and was served this same day on all parties and attorneys of record, either via transmission of Notices of Electronic Filing generated by the E-Portal or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

By: /James B. Lake/

Attorney