

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 9:20-cv-81163-MIDDLEBROOKS/BRANNON

JEFFREY LAGRASSO and
DEBORAH LAGRASSO,

Plaintiffs,

vs.

SEVEN BRIDGES HOMEOWNERS
ASSOCIATION, INC., a Florida
corporation, and RACHEL ABOUD
TANNENHOLZ,

Defendants.

**DEFENDANT, SEVEN BRIDGES HOMEOWNERS ASSOCIATION, INC.'S,
RULE 26(A)(1) DISCLOSURES**

COME NOW, the Defendant, SEVEN BRIDGES HOMEOWNERS ASSOCIATION, INC. (hereinafter known as "ASSOCIATION"), by and through its undersigned Counsel, hereby submits the following initial disclosures pursuant to Federal Rules of Civil Procedure 26(A)(1):

INITIAL DISCLOSURES

1. The name, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claim or defense, unless solely for impeachment, identifying the subjects of the information:

A. JEFFREY LAGRASSO – c/o Murdoch Weires, PLLC. Mr. LaGrasso is the Plaintiff in the instant matter, and he has knowledge regarding the allegations contained in the Complaint.

Lagrasso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 2

B. DEBORAH LAGRASSO – c/o Murdoch Weires, PLLC. Mrs. LaGrasso is the Plaintiff in the instant matter, and she has knowledge regarding the allegations contained in the Complaint.

C. RACHEL ABOUND TANNENHOLZ – c/o Debra D. Klingsberg, Esq. Mrs. Tannenholz is a Defendant in the instant matter and has knowledge regarding the allegations contained in the Plaintiffs' Complaint.

D. BRUCE LYLE TANNENHOLZ – 9120 Moriset Ct, Delray Beach, FL 33446. Mr. Tannenholz is a resident of the ASSOCIATION and husband of Defendant RACHEL ABOUND TANNENHOLZ. Mr. Tannenholz has knowledge regarding the allegations contained in Plaintiffs' Complaint and his Declaration filed as D.E. 31.

E. Lawrence Orbach – c/o Vernis & Bowling of Palm Beach, P.A. Mr. Orbach is the President of the ASSOCIATION's Board of Directors and he has knowledge of the ASSOCIATION's Rules and Regulations and policies and procedures regarding violations, fines, and suspensions. Mr. Orbach also has knowledge regarding the allegations contained in the Plaintiffs' Complaint.

F. George Kramer – c/o Vernis & Bowling of Palm Beach, P.A. Mr. Kramer is the Vice-President of the ASSOCIATION's Board of Directors and he has knowledge of the ASSOCIATION's Rules and Regulations and policies and procedures regarding violations, fines, and suspensions. Mr. Kramer also has knowledge regarding the allegations contained in the Plaintiffs' Complaint.

G. Arleen Goldenberg –c/o Vernis & Bowling of Palm Beach, P.A. Ms. Goldenberg is the Secretary and Treasurer of the ASSOCIATION's Board of Directors and

Lagrosso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 3

she has knowledge of the ASSOCIATION's Rules and Regulations and policies and procedures regarding violations, fines, and suspensions. Ms. Goldenberg also has knowledge regarding the allegations contained in the Plaintiffs' Complaint.

H. Heidi Womack – c/o Vernis & Bowling of Palm Beach, P.A. Ms. Womack is the Property Manager of the ASSOCIATION and she has knowledge regarding the ASSOCIATION's Rules and Regulation and policies and procedures regarding violations, fines, and suspension. Ms. Womack also has knowledge regarding the allegations contained in the Plaintiffs' Complaint.

I. Eric Godin – c/o Vernis & Bowling of Palm Beach, P.A. Mr. Godin is the Tennis Director of the ASSOCIATION and he has knowledge regarding the coaching services provided to the Plaintiffs and their children and the November 22, 2019 incident.

J. Edna Willis – c/o Vernis & Bowling of Palm Beach, P.A. Ms. Willis serves on the ASSOCIATION's Compliance Committee and she has knowledge regarding the ASSOCIATION's policies and procedures regarding fines and suspensions. Ms. Willis also has knowledge regarding the February 13, 2020 and July 1, 2020 Compliance Committee Hearings and the subsequent fines and suspensions imposed on Mrs. LaGrasso.

K. George Spencer – c/o Vernis & Bowling of Palm Beach, P.A. Mr. Spencer serves on the ASSOCIATION's Compliance Committee and he has knowledge regarding the ASSOCIATION's policies and procedures regarding fines and suspensions. Mr. Spencer also has knowledge regarding the February 13, 2020 and July 1, 2020 Compliance Committee Hearings and the subsequent fines and suspensions imposed on Mrs. LaGrasso.

Lagrosso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 4

L. Rachel Stricoff – c/o Vernis & Bowling of Palm Beach, P.A. Ms. Stricoff serves on the ASSOCIATION's Compliance Committee and she has knowledge regarding the ASSOCIATION's policies and procedures regarding fines and suspensions. Ms. Stricoff also has knowledge regarding the February 13, 2020 Compliance Committee Hearing and the subsequent fines and suspensions imposed on Mrs. LaGrasso.

M. Melissa Darnell – c/o Vernis & Bowling of Palm Beach, P.A. Ms. Darnell serves on the ASSOCIATION's Compliance Committee and she has knowledge regarding the ASSOCIATION's policies and procedures regarding fines and suspensions. Ms. Darnell also has knowledge regarding the July 1, 2020 Compliance Committee Hearing and the subsequent fines and suspensions imposed on Mrs. LaGrasso.

N. Matthew Weiss – 16825 Pierre Cir, Delray Beach, FL 33446. Mr. Weiss is a former Board Member of the ASSOCIATION who served as President on the Board of Directors in 2019. Mr. Weiss has knowledge of the ASSOCIATION's Rules and Regulations and policies and procedures regarding violations, fines, and suspensions.

O. Mehmet Bekisoglu – 9759 Vitrail Lane, Delray Beach, FL 33446. Mr. Bekisoglu is a former Board Member of the ASSOC who served as Secretary on the Board of Directors in 2019 and served as the Tennis Committee Chair in November 2019. Mr. Bekisoglu has knowledge of the ASSOCIATION's Rules and Regulations and policies and procedures regarding violations, fines, and suspensions. Mr. Bekisoglu also has knowledge regarding the November 22, 2019 incident.

P. Kirac Bekisoglu – 9759 Vitrail Lane, Delray Beach, Florida 33446. Mr. Bekisoglu is a former Tennis Pro Coach at the ASSOCIATION who provided coaching

Lagrasso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 5

services to the Plaintiffs' daughters. Mr. Bekisoglu has knowledge regarding the November 22, 2019 incident.

Q. Roman Turtygin – 715 SW 17th Ave, Suite 1612, Delray Beach, FL 33444. Mr. Turtygin is a former Tennis Pro Coach at the ASSOCIATION who provided coaching services to the Plaintiffs' daughters. Mr. Turtygin has knowledge regarding the November 22, 2019 incident.

R. Eleonora Lannozi – c/o Vernis & Bowling of Palm Beach, P.A. Ms. Lannozi is a Tennis Pro Coach at the ASSOCIATION who provided coaching services to the Plaintiffs' daughters. Ms. Lannozi may have knowledge regarding the November 22, 2019 incident.

S. Elana Ecker – 9786 Montpellier Drive, Delray, FL 33446. Ms. Ecker is a member of the ASSOCIATION and a member of the Tennis League. Ms. Ecker has knowledge regarding the November 22, 2019 incident.

T. Elana Andrews – 9542 Eden Roc Court, Delray, FL 33446. Ms. Andrews is a member of the ASSOCIATION and a member of the Tennis League. Ms. Andrews has knowledge regarding the November 22, 2019 incident.

U. Nicole Martin – 16674 Couture Court, Delray, FL 33446. Ms. Martin is a member of the ASSOCIATION and a member of the Tennis League. Ms. Martin has knowledge regarding The November 22, 2019 incident.

V. Tawny Young – 9856 Rennes Ln, Delray Beach, FL 33446. Ms. Young is a member of the ASSOCIATION and a member of the Tennis League. Ms. Young has knowledge regarding the November 22, 2019 incident.

Lagrosso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 6

W. Nelda Raful – 16262 Pantheon Pass, Delray Beach, FL 33446. Ms. Raful is a member of the ASSOCIATION and a member of the Tennis League. Ms. Raful has knowledge regarding the November 22, 2019 incident.

X. Helen Harris – 16700 Strasbourg Ln, Delray Beach, FL 33446. Ms. Harris is a member of the ASSOCIATION and a member of the Tennis League. Ms. Harris has knowledge regarding the November 22, 2019 incident.

Y. Gloria Lorenz – 16764 Strasbourg Ln, Delray Beach, FL 33446. Ms. Lorenz is a member of the ASSOCIATION and a member of the Tennis League. Ms. Lorenz has knowledge regarding the November 22, 2019 incident.

Z. Linda Martin - Address unknown. Ms. Martin is a member of the Tennis League. Ms. Martin has knowledge regarding the November 22, 2019 incident.

AA. Platinum Group Security – 212 N. Federal Hwy, Deerfield Beach, FL 33411, Telephone Number (888) 940 - 4747. Platinum Group Security is a security company employed by the ASSOCIATION and has knowledge regarding November 22, 2019.

BB. All persons disclosed pursuant to Federal Rule of Civil Procedure 26(A)(1) by Plaintiffs in the instant action.

CC. All persons disclosed pursuant to Federal Rules of Civil Procedure 26(A)(1) by Defendant RACHEL ABOUND TANNENHOLZ in this action.

2. A copy or description by category and location of all documents, electronically stored information, and tangible things that Defendant had in its possession, custody or control and may use to support its claim or defenses, unless the use would be solely for impeachment.

Lagrasso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 7

A. The ASSOCIATION's Governing Documents, including, Declaration, Articles of Incorporation, Bylaws, Rules and Regulations, amendments thereto – Exhibit "A", Bates Numbers ASSOCIATION – EXHIBIT A - 000001 – 000177.

B. Non privileged documents regarding or relating to the allegations in the Complaint – Exhibit "B", Bates Numbers ASSOCIATION – EXHIBIT B – 000001 – 000331.

C. DEBORAH LAGRASSO's Facebook Posts regarding or relating the ASSOCIATION – Exhibit "C", Bates Numbers ASSOCIATION – EXHIBIT C – 000001 – 000262.

3. Any insurance agreement under which any insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse payments made to satisfy the judgment.

A. The ASSOCIATION is insured by its Insurance Policy with Philadelphia Insurance Company – Exhibit "D" Bates Numbers ASSOCIATION – EXHIBIT D – 000001 – 000036.

4. A computation of each category of damages claimed by the disclosed party:

A. It is the ASSOCIATION's position that the Plaintiffs have no damages caused by any action or inaction of the ASSOCIATION. In the event the ASSOCIATION is the prevailing Party in the instant lawsuit it will seek recovery of its attorney's fees and costs pursuant to Fla. Stat. Chapter 720 et. seq. and the ASSOCIATION'S Governing Documents and all other applicable statutes, codes or the like.

Lagrasso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 8

5. The disclosures provided by the ASSOCIATION are preliminary and are based on information that it currently possesses. The ASSOCIATION retains the right to change or supplement these disclosures upon further discovery.

6. Pursuant to the Federal Rules of Civil Procedure, the ASSOCIATION will supplement these Initial Disclosures with new information after it is located or otherwise becomes available.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 25, 2020, I electronically filed the foregoing documents with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronically Filing generated by CM/ECF or in some other authorized manner for those Counsel or Parties who are not authorized to receive electronically Notice of Electronic Filing.

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Lagrosso v. Seven Bridge Homeowners Association, Inc.
Case No. 9:20-cv-81163– MIDDLEBROOKS/BRANNON
Association's Rule 26 Witness Disclosures
Page 9

SERVICE LIST

CASE NO. 9:20-cv-81163– MIDDLEBROOKS/Brannon

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