

**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.

\_\_\_\_\_ /

**PLAINTIFFS' RULE 26(a)(1) DISCLOSURES**

COME NOW the Plaintiffs, JEFFREY LAGRASSO and DEBORAH LAGRASSO, by and through their undersigned attorneys and hereby submit this their initial disclosures pursuant to Rule 26(a)(1), Fed. R. Civ. P., and state as follows:

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 MurdochWeires PLLC – Plaintiff in this case; has knowledge regarding the allegations in the Complaint;
  - B. Deborah LaGrasso – c/o MurdochWeires PLLC – Co-Plaintiff in this case; has knowledge regarding the allegations in the Complaint;
  - C. S. L. – c/o MurdochWeires PLLC – minor daughter of Plaintiffs; has knowledge regarding tennis lessons and incident of November 22, 2019;

- D. Eric Godin – c/o Vernis & Bowling of Palm Beach, P.A.; Mr. Godin is the Tennis Director at the Association; Mr. Godin has knowledge regarding the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- E. Kirac Bekisoglu – 9759 Vitrail Lane, Delray Beach, Florida 33446; Mr. Bekisoglu is a former tennis pro coach at the Association; Mr. Bekisoglu has knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- F. Roman Tutygin – 715 SW 17<sup>th</sup> Ave, Suite 1612, Delray Beach, Florida 33444; Mr. Turtygin is a former tennis pro coach at the Association; Mr. Turtygin has knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- G. Leah (last name unknown) -- Leah is believed to be a former employee of the tennis center at the Association; Leah is believed to have knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- H. Gabriel (last name unknown) -- Gabriel is believed to be a former employee of the tennis center at the Association; Gabriel is believed to have knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- I. Adrian (last name unknown) -- Adrian is believed to be a former employee of the tennis center at the Association; Adrian is believed to have knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- J. Eleonora Lannozi – c/o Vernis & Bowling of Palm Beach, P.A.; Ms. Lannozi is a tennis pro coach at the Association; Mr. Lannozi may have knowledge of the coaching of the LaGrasso children and the tennis incident of November 22, 2019;
- K. Rachel Aboud Tannenholz – c/o Debra D. Kingsberg, Esq. – Co-Defendant in this case; has knowledge regarding the allegations in the Complaint;
- L. Bruce Tannenholz – c/o Debra D. Klingsberg, Esq. – husband of Co-Defendant in this case; believed to have knowledge regarding the allegations in the Complaint;

- M. Heidi Womack – c/o Vernis & Bowling of Palm Beach, P.A.; Ms. Womack is the property manager of Association; Ms. Womack is believed to have knowledge regarding the Association rules and procedures and the history of the Association imposing violations, fines and suspensions of Association members.
  - N. Corporate representative for Seven Bridges Homeowners Association, Inc. – c/o Vernis & Bowling of Palm Beach, P.A.; believed to have knowledge regarding the allegations of the Complaint.
  - O. Corporate representative for Platinum Group Security – 212 N. Federal Highway, Deerfield Beach, Florida 33411; Platinum Group Security is believed to have information about the allegations of the Complaint, the tennis incident of November 22, 2019, incidents involving security calls by the Plaintiffs, incidents involving security calls by other members of the Association, and instructions from the Association relating to treatment of the Plaintiffs.
  - P. All persons disclosed pursuant to Rule 26(a)(1), Fed. R. Civ. P., by Defendant Association.
  - Q. All persons disclosed pursuant to Rule 26(a)(1), Fed. R. Civ. P., by Defendant Tannenholz.
2. A copy or description by category and location of all documents, electronically stored information, and tangible things that Plaintiffs had in their possession, custody or control and may use to support their claim or defenses, unless the use would be solely for impeachment:
- A. The description by category of Plaintiffs' Rule 26(a)(1)(B) disclosures is: the governing documents of the Association including, but not limited to, its declaration of covenants, rules and bylaws; correspondence with the Association, its employees, former

employees and agents; copies of Plaintiffs' Facebook posts; copies of Plaintiffs' telephone text messages; video recordings and screenshots of the tennis incident; video and audio recordings of Tannenholz interacting with Plaintiff Deborah LaGrasso; media articles about the Association; private security services invoices; copies of payment of fines assessed by Association; documents identified by any other party; and any documents needed for rebuttal or impeachment.

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. None.
4. A computation of each category of damages claimed by the disclosed party:
  - A. Without waiving their right to supplement this disclosure during discovery, the Plaintiffs state that damages known to date are those asserted and detailed in Plaintiff's Complaint, including compensatory damages, in addition to any damages allowed by law, including without limitation exemplary damages, punitive damages, and attorney's fees pursuant to 42 U.S.C. § 3612(p). Contrary to the position espoused by the Association, Plaintiffs do not believe that the claims herein are subject to the prevailing party provisions of Chapter 720, et seq., Fla. Stat., and leaves that issue for resolution by the Court. However, if the Court addresses the issue and rules that Chapter 720, Fla. Stat., is applicable, then Plaintiffs reserve the right to seek a recovery of their attorney's fees pursuant to that additional ground. Plaintiffs have also sought all other, further, or different relief as the Court deems just and reasonable.
5. The disclosures provided herein by Plaintiffs are preliminary and are based on information that it currently possesses. Plaintiffs reserve the right to change or supplement these disclosures upon further discovery.

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of September, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notice of Electronic Filing.

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