

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
CHARLOTTE COUNTY, FLORIDA CIVIL ACTION

SILVER KING ENTERTAINMENT, INC.
d/b/a The Professional Tarpon Tournament
Series, a Florida corporation,

Plaintiff,

vs.

Case No. 13-1699-CA

SAVE THE TARPON, INC., a Florida
corporation; THOMAS M. MCLAUGHLIN;
FRANK DAVIS; RICHARD HIRSCH;
RHETT MORRIS; and MARK L. FUTCH;

Defendants.

**DEFENDANTS' OBJECTION TO PLAINTIFF'S
NOTICE OF NON-PARTY PRODUCTION**

Defendants, SAVE THE TARPON, INC., THOMAS M. MCLAUGHLIN, FRANK DAVIS, RICHARD HIRSH, RHETT MORRIS, and MARK L. FUTCH (hereinafter Defendants), by and through their undersigned counsel, hereby file their objection to Plaintiff's Notice of Non-Party Production as follows:

1. On or about November 12, 2013, Plaintiff served a Notice of Non-Party Production with respect to the Subpoena to Produce Things without Deposition that is attached hereto as Exhibit #1.

2. Defendants object to the issuance of the aforementioned Subpoena. The Subpoena is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the individuals that utilize the screen names identified in the Subpoena have an expectation of privacy and confidentiality with respect to same.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished to Mitchell L. Feldman, Esq. and Dennis A. Creed, III, Esq., Feldman Morgado, P.A. via e-mail at mfeldman@ffmlawgroup.com, dcreed@ffmlawgroup.com, wbennett@ffmlawgroup.com, and nsuarez@ffmlawgroup.com on this 18th day of November, 2013.

Brian M. Beason

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**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR CHARLOTTE COUNTY, FLORIDA
CIVIL DIVISION**

SILVER KING ENTERTAINMENT, LLC,
d/b/a The Professional Tarpon Tournament
Series, a Florida Corporation,

Case No.: 13001699CA

Plaintiff,

vs.

SAVE THE TARPON, INC., a Florida
Corporation; THOMAS M. MCLAUGHLIN;
FRANK DAVIS; RICHARD HIRSCH;
RHETT MORRIS; and MARK L. FUTCH,
Individuals,

Defendants.

SUBPOENA TO PRODUCE THINGS WITHOUT DEPOSITION

TO: **WICK ENTERPRISES, INC.**
2700 S KANNER HWY
STUART, FL 34994

YOU ARE COMMANDED to appear at Feldman Morgado, PA, 501 N. Reo Street,
Tampa, Florida 33609 December 12, 2013 at 5:00 p.m. and have with you at that time and place
the following:

- 1. Any and all documents, records, correspondence, legal documents, files and information regarding the user accounts of forum participants for user names RJ Kirker, WhiteBacon, Joey Buttons, OldHewes18Red, Jirvin70 and RestlessNative in connection with the website forums of <http://forums.floridasportsman.com>.*

If you fail to appear, you may be in Contempt of Court.

These items will be inspected and may be copies at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

EXHIBIT #1

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed by the attorney whose name appears on this subpoena and unless excused from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

Dated on this _____ day of November 2013.

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