

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, STATE OF FLORIDA
CIVIL DIVISION

NITRO MOBILE SOLUTIONS, LLC.,
a Florida Limited Liability Corporation,

Plaintiff,

Case No. 17-CA-010953
Division J

v.

EYE C SOLUTIONS, LLC,
A Florida Limited Liability Corporation, and
LISA MONNET, an individual,

Defendants.

NOTICE OF TAKING DEPOSITION DUCES TECUM

To:

LeesaAnn Dodds, Esquire
Dodds Law Group, P.A.
412 E. Madison St., Suite 1100
Tampa, FL 33602
leesaannattny@gmail.com

PLEASE TAKE NOTICE that Plaintiff, Nitro Mobile Solutions, LLC., pursuant to Fla. R. Civ. P. 1.310, will take the deposition upon oral examination of the Records Custodian for Tampa Bay Defense Alliance, Inc., on **October 10, 2018 at 10:30 a.m.**, before Orange Legal Reporting, or such other person duly authorized to administer oaths at the offices of Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A., 101 E. Kennedy Blvd., Suite 2700, Tampa, Florida 33602. The deposition is being taken for the purposes of discovery, for use at trial and for such other purposes as are permitted under the Florida Rules of Civil Procedure.

The examination of the deponent may continue from day to day until completed or may be adjourned to be reconvened at such later date as may be established therefor by those in attendance at such deposition. You are invited to attend and cross-examine the witness.

PLEASE BE GOVERNED ACCORDINGLY.

I HEREBY CERTIFY that on the **21st day of September, 2018**, counsel for Nitro Mobile Solutions, LLC electronically filed the foregoing with the Clerk of Court by using the Florida Courts E-Filing Portal System, which will send a notice of electronic filing and copy to the parties and counsel of record above.

/s/ Dean A. Kent

DEAN A. KENT, ESQUIRE

Florida Bar No. 0307040

Primary email: dkent@trenam.com

Secondary email: pholliday@trenam.com

TRENAM, KEMKER, SCHARF, BARKIN

FRYE, O'NEILL & MULLIS, P.A.

2700 Bank of America Plaza

101 E. Kennedy Blvd.

Tampa, Florida 33602

Tel: (813) 223-7474

Fax: (813) 229-6553

Attorneys for Nitro Mobile Solutions, LLC

Copy furnished to Orange Legal Reporting

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SUBPOENA DUCES TECUM FOR DEPOSITION

To: TAMPA BAY DEFENSE ALLIANCE, INC. ("TBDA")
c/o Tim Jones, President
710 Oakfield Dr.
Suite 266
Brandon, Fl. 33511

YOU ARE COMMANDED to appear and produce at the offices of Trenam, Kemker, Scharf, Barkin, Frye, O'Neill & Mullis, P.A., 101 E. Kennedy Blvd, Suite 2700, Tampa, Florida 33602 on **October 10, 2018 at 10:30 a.m.**, or such other mutually agreeable time and place, and to have with you the responsive documents requested in **Exhibit A**, attached hereto.

These items will be inspected and may be copied 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. A payment of \$20.00 has been included along with this subpoena to cover the cost of copying and furnishing these records. **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.** In the event that the cost of preparation and/or copying of the documents requested exceeds \$50.00, you must contact the undersigned

attorneys for Plaintiffs to provide an estimate as to the total cost of production and discuss whether Plaintiffs will move forward with this production request. 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.

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 the attorney or the Court, you shall respond to this subpoena as directed.

DATED on September 21, 2018.

FOR THE COURT

/s/ Dean A. Kent

DEAN A. KENT
FOR THE COURT

/s/ Dean A. Kent

DEAN A. KENT, ESQUIRE
Florida Bar No. 0307040
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Attorneys for Nitro Mobile Solutions, LLC

EXHIBIT A

1. Any and all documents relating, referring, or otherwise referencing the results of any investigation by TBDA into Eye C. Solutions, LLC.
2. Any and all documents relating, referring, or otherwise referencing the results of any investigation by TBDA into Lisa Monnet.
3. Any and all documents relating, referring, or otherwise referencing the results of any investigation by TBDA into Mark Roberts a/k/a Mark Monnet.
4. Any and all documents relating, referring, or otherwise referencing the alleged improper withdrawal or use of any TBDA funds by Eye C. Solutions, LLC.
5. Any and all documents relating, referring, or otherwise referencing the alleged improper withdrawal or use of any TBDA funds by Lisa Monnet.
6. Any and all documents relating, referring, or otherwise referencing the alleged improper withdrawal or use of any TBDA funds by Mark Roberts a/k/a Mark Monnet.
7. Any and all documents relating, referring, or otherwise referencing TBDA notifying any state or local agency or law enforcement of any issue regarding Lisa Monnet.
8. Any and all documents relating, referring, or otherwise referencing TBDA notifying any state or local agency or law enforcement of any issue regarding Eye C Solutions, LLC
9. Any and all documents relating, referring, or otherwise referencing TBDA notifying any state or local agency or law enforcement of any issue regarding Mark Roberts a/k/a Mark Monnet.
10. Any and all documents relating, referring, or otherwise referencing the repayment of any funds to TBDA by Lisa Monnet since January 1, 2018.

11. Any and all documents relating, referring, or otherwise referencing the repayment of any funds to TBDA by Eye C Solutions since January 1, 2018.

12. Any and all documents relating, referring, or otherwise referencing the repayment of any funds to TBDA by Mark Monnet a/k/a Mark Roberts since January 1, 2018.

13. Any and all documents relating, referring, or otherwise referencing communications with Dan Monnet regarding Eye C Solutions, LLC, Mark Roberts a/k/a Mark Monnet, and/or Lisa Monnet.

14. Any and all documents relating, referring, or otherwise referencing any due diligence or investigation into the backgrounds of Lisa Monnet.

15. Any and all documents relating, referring, or otherwise referencing any due diligence or investigation into the backgrounds of Mark Roberts a/k/a Mark Monnet.

16. Any and all documents relating, referring, or otherwise referencing any due diligence or investigation into the backgrounds of Eye C Solutions, LLC.

17. Any and all documents relating, referring, or otherwise referencing Lisa Monnet referring to herself while associated with TBDA as having a Ph.D. from Creighton University or otherwise being a "Doctor."

18. Any and all documents reflecting the results of any financial audit performed by TBDA, or any other person or entity at its direction, after Lisa Monnet's termination from TBDA.

19. Any and all documents reflecting the results of any forensic audit performed by TBDA, or by any person or entity at its direction, after Lisa Monnet's termination from TBDA.