

**A** Admit  
**D** Deny  
**L** Lacks knowledge to respond

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.

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**PLAINTIFF, NITRO MOBILE SOLUTIONS, LLC'S FIRST  
REQUEST FOR ADMISSIONS TO LISA MONNET**

Nitro Mobile Solutions, LLC ("Nitro"), by and through undersigned counsel, and pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, requests Defendant, Lisa Monnet ("Monnet"), within thirty (30) days after service of this request, admit or deny the truth of each of the following statements:

- A** 1. Admit that you have no personal relationship with Richard Branson.
- A** 2. Admit that you have never had any business relationship with Richard Branson.
- A** 3. Admit that you have never had a business relationship with Virgin Group, Ltd. or any of its subsidiaries.
- A** 4. Admit that you do not own a home in Longboat Key, Florida.
- D** 5. Admit that you do not have a degree from the University of Colorado at Boulder.
- D** 6. Admit that you did not receive an MBA from the University of Denver.
- D** 7. Admit that you did not receive a Ph.D. from Creighton University.

**A** 8. Admit that you have never had any communications with Richard Branson regarding Nitro.

**D** 9. Admit that you have never had any communications with Virgin Group, Ltd., or any of its subsidiaries, regarding Nitro.

**A** 10. Admit that you did not meet with Richard Branson on November 10, 2017.

**D** 11. Admit that you provided Nitro's employees with a form of "Personal And Business Confidentiality Agreement," a copy of which is attached as **Exhibit D** to the complaint, purportedly from Virgin Group, Ltd.

**L** 12. Admit that you are aware that Richard Branson did not sign the Nitro Non-Disclosure Agreement attached to the Complaint as **Exhibit E**.

**D** 13. Admit that you obtained and copied Richard Branson's signature and attached it to the Nitro Non-Disclosure Agreement attached to the Complaint as **Exhibit E**.

**L** 14. Admit that you have never had any communications with the Orlando Magic basketball team regarding Nitro.

**D** 15. Admit that you did not invest any of your personal funds into Nitro in exchange for a membership interest, or ownership, in the entity.

**D** 16. Admit that you are currently married to Mark Robert Monnet.

**D** 17. Admit that Mark Roberts is also known as Mark Robert Monnet.

**D** 18. Admit that you do not own an aviation related business.

**D** 19. Admit that you have never owned an aviation related business.

**A** 20. Admit that you do not own any aircraft.

**A** 21. Admit that you have never owned any aircraft.

- A** 22. Admit that you are not an agent or asset of the Central Intelligence Agency (“CIA”).
- A** 23. Admit that you have never been an agent or asset of the CIA.
- D** 24. Admit that you communicated with Nitro’s investors and recommend they withdraw their investment from Nitro.
- D** 25. Admit that you did not sell Eye-C-Solutions.
- D** 26. Admit that you did not personally receive the “American Spirit Award” from the National Business Aviation Association (NBAA).
- D** 27. Admit that you did not personally receive the “Al Ueltschi Award for Humanitarian Leadership” from the National Business Aviation Association (NBAA).
- D** 28. Admit that you have never been on the “Policy and Legislation/Procurement Committee” for Women Impacting Public Policy (WIPP).
- D** 29. Admit that you have never been the Education Chair for the Central & North Florida Chapter of HIMSS (CNDHIMSS).

/s/ Dean A. Kent  
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Attorneys for Nitro Mobile Solutions, LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29<sup>th</sup> day of January 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 any counsel of record, and has mailed a copy to the party below together via E-Mail:

Lisa Monnet  
3925 90th Avenue East  
Parrish, Florida 34219  
[lmonnet@eyecsolutions.com](mailto:lmonnet@eyecsolutions.com)

*/s/ Dean A. Kent*  
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Attorney