

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION

CLAY G. COLSON,

CASE NO.: 21-005793-CI

Plaintiff,

v.

THE CITY OF TARPON SPRINGS, FLORIDA,

Defendant.

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**PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST REQUEST TO PRODUCE**

Plaintiff, CLAY G. COLSON, responds to the Defendant's First Request to Produce served by counsel for the Defendant, CITY OF TARPON SPRINGS, FLORIDA, on March 9, 2022 as follows:

1. I object to request 1 because it seeks information which is not relevant to this action and is not likely to lead to the discovery of relevant information because ownership of property is not required to establish standing in a challenge to a development order brought under Florida Statutes § 163.3215(3) under City of Fort Myers v. Splitt, 988 So.2d 28 (Fla. 2d DCA 2008) and similar cases interpreting standing under such statute. Furthermore, the requested information could be obtained from a review of property records by counsel for the Defendant. In addition, for the foregoing reasons, such request is also unduly burdensome. Without waiving my objections, I do not have any documents in my possession, custody or control to provide which is responsive to such request.

2. I object to request 2 because it seeks information which is not relevant to this action and is not likely to lead to the discovery of relevant information because ownership of property is not required to establish standing in a challenge to a development order brought under Florida Statutes § 163.3215(3) under *City of Fort Myers v. Splitt*, 988 So.2d 28 (Fla. 2d DCA 2008) and similar cases interpreting standing under such statute. Furthermore, the requested information could be obtained from a review of property records by counsel for the Defendant. In addition, for the foregoing reasons, such request is also unduly burdensome. Without waiving my objections, I do not have any documents in my possession, custody or control to provide which is responsive to such request.
  
3. I object to request 3 because it seeks information which is not relevant to this action and is not likely to lead to the discovery of relevant information because ownership of property is not required to establish standing in a challenge to a development order brought under Florida Statutes § 163.3215(3) under *City of Fort Myers v. Splitt*, 988 So.2d 28 (Fla. 2d DCA 2008) and similar cases interpreting standing under such statute. Furthermore, the requested information could be obtained from a review of property records by counsel for the Defendant. In addition, for the foregoing reasons, such request is also unduly burdensome. Without waiving my objections, I do not have any documents in my possession, custody or control to provide which is responsive to such request.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served by U.S. Mail to Jay Daigneault, Esq. of Trask Daigneault, LLP at 1001 S. Fort Harrison Ave., Suite 201 in

Clearwater, FL 33756 on this 31 day of May 2022.



CLAY G. COLSON  
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