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# State of Florida Division of Administrative Hearings: Respondent University of North Florida's Response to Petitioners' Request to Produce

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T R. Hainline Jr

Marcia P. Parker

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STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

MICHAEL W. WOODWARD, RICHARD EKLER,  
DENISE HOK and JASON REVISKY,

Petitioners,

v.

DOAH CASE NO. 90-008083

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
No. 90-1003

Respondents.

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**RESPONDENT UNIVERSITY OF NORTH FLORIDA'S RESPONSE TO  
PETITIONERS' REQUEST TO PRODUCE**

Respondent, University of North Florida ("UNF") through its undersigned attorney hereby responds to the Petitioners' Request to Produce served by mail upon UNF on January 25, 1991.

✓ 1. All documents within the possession, custody or control of UNF relating to the conceptualization, initiation, and implementation of the April, 1989 public hearing regarding the proposed "loop" road will be made available to Petitioners for inspection. The documents will be available at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207 (904) 398-3911 after reasonable notice.

✓ 2. All documents within the possession, custody or control of UNF pertaining to issues related to the "loop" road controversy, including tentative plans considered or discussed either before or subsequent to the April, 1989 public hearing will be available for

*all opposition petitions, letters, cards, forms, ballots (not copied)*

inspection at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207 (904) 398-3911 after reasonable notice.

3. UNF objects to Request Number 3 as seeking documents which are irrelevant to the subject matter of the pending action and are not reasonably calculated to lead to the discovery of admissible evidence.

4. All documents in the possession, custody or control of UNF concerning road access on the proposed roads which are the subject of the pending action (either pre- or post-construction) for the proposed research and development park among or between any officers, agents, or representatives of the following: The Regency Group, the UNF Administration, the UNF Foundation and the Duval Research and Development Authority will be made available to Petitioners at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207 (904) 398-3911 after reasonable notice.

UNF objects to Request Number 4 to the extent that such documents are requested as they relate to road access not related to this project as being irrelevant to the subject matter of the pending action and not reasonably calculated to lead to the discovery of admissible evidence.

5. UNF objects to Request Number 5 as seeking documents which are irrelevant to the subject matter of the pending action and are not reasonably calculated to lead to the discovery of admissible evidence.

6. UNF objects to Request Number 6 as seeking documents which are irrelevant to the subject matter of the pending action and are not reasonably calculated to lead to the discovery of admissable evidence.

✓ 7. All documents in the possession, custody or control of UNF concerning the 1978 designation of the UNF nature trails as national recreational trails in the U.S. National Trail System, as well as measures taken to achieve that designation will be made available to Petitioners at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207 (904) 398-3911 after reasonable notice.

8. UNF is unaware that any such document exists and objects to Request Number 8 as seeking a document or documents which are irrelevant to the subject matter of the pending action and are not reasonably calculated to lead to the discovery of admissable evidence.

9. UNF objects to Request Number 9 as seeking documents which are irrelevant to the subject matter of the pending action and are not reasonably calculated to lead to the discovery of admissable evidence.

✓ 10. All specifications, plans, drawings, surveys and inspection reports in the possession, custody or control of UNF related to the planning and construction of the proposed project will be made available to Petitioners at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207 (904) 398-3911 after reasonable notice.

UNF objects to Request Number 10 insofar as it seeks contracts and invoices related to the planning and construction of the proposed project as irrelevant to the subject matter of the pending action and not reasonably calculated to lead to the discovery of admissible evidence.

11. All writings within the possession, custody or control of UNF which are anticipated to be offered for evidence at hearing will be available at the offices of Rogers, Towers, Bailey, Jones & Gay, 1300 Gulf Life Drive, Jacksonville, Florida 32207, (904) 398-3911 after reasonable notice.

ROGERS, TOWERS, BAILEY, JONES & GAY

By: Marcia P. Parker

T.R. HAINLINE, JR.  
Florida Bar No. 372013  
MARCIA P. PARKER  
Florida Bar No. 700150  
1300 Gulf Life Drive  
Jacksonville, Florida 32207  
(904) 398-3911

Attorneys for Respondent  
University of North Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Timothy Keyser, Attorney for Petitioners and Intervenors Florida Wildlife Federation, Post Office Box 92, Interlachen, Florida 32148, and Clare Gray, Attorney for St. Johns River Water Management District, P.O. Box 1429, Palatka, Florida 32178-1429 by U.S. Mail this 27<sup>th</sup> day of February, 1991.

Marcia P. Parker

Attorney

STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

TERESA BURKITT,

Petitioner,

v.

DOAH CASE NO. 90-003232

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916A

Respondents.

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CATHLENE DENNY,

Petitioner,

v.

DOAH CASE NO. 90-003233

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916B

Respondents.

---

MICHAEL W. WOODWARD,

Petitioner,

v.

DOAH CASE NO. 90-003234

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916C

Respondents.

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PETITIONERS' SECOND REQUEST FOR ADMISSIONS  
TO UNIVERSITY OF NORTH FLORIDA AND ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT AND FOR OFFICIAL RECOGNITION

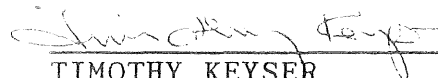
Petitioner requests that Respondents, UNIVERSITY OF NORTH FLORIDA and ST. JOHNS RIVER WATER MANAGEMENT DISTRICT, admit the following pursuant to Fla.Civ.P. 1.370.

1. Each of the following documents attached to or mentioned with this request is a true copy of the original and is genuine:

a. Wetland Resource Project Technical Staff Report dated July 23, 1990.

b. Management and Storage of Surface Waters Technical Staff Report dated July 23, 1990.

2. Petitioner further moves that the Hearing Officer take official recognition of both of the above referenced technical staff reports pursuant to Sections 120.61, 90.202 (5), (12), 90.203 and 90.204 of the Florida Statutes.



TIMOTHY KEYSER  
Attorney for Petitioner  
Florida Bar No.: 181740  
Post Office Box 92  
Interlachen, Florida 32148  
(904) 684-4673

CERTIFICATE OF SERVICE

I CERTIFY that a copy hereof has been furnished to Marcia P. Parker, Attorney for University of North Florida, 1300 Building, 1300 Gulf Life Drive, Jacksonville, Florida 32207 and Clare E.

Gray, Attorney for St. Johns River Water Management District,  
Post Office Box 1429, Palatka, Florida 32178-1429 by U. S. mail  
this 5<sup>th</sup> day of August, 1990.

  
\_\_\_\_\_  
TIMOTHY KEYSER, ATTORNEY



STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

TERESA BURKITT,

Petitioner,

v.

DOAH CASE NO. 90-003232

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916A

Respondents.

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CATHLENE DENNY,

Petitioner,

v.

DOAH CASE NO. 90-003233

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916B

Respondents.

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MICHAEL W. WOODWARD,

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v.

DOAH CASE NO. 90-003234

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916C

Respondents.

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PETITIONERS' NOTICE OF SERVICE OF ANSWERED  
FIRST INTERROGATORIES OF UNIVERSITY NORTH FLORIDA

All petitioners, by the undersigned attorney, hereby serve

the answered original of Respondent's, THE UNIVERSITY OF NORTH FLORIDA, first interrogatories.



TIMOTHY KEYSER  
Attorney for Petitioners  
Florida Bar No.: 181740  
Post Office Box 92  
Interlachen, Florida 32148  
(904) 684-4673

CERTIFICATE OF SERVICE

I CERTIFY that a copy hereof has been furnished to Marcia P. Parker, Attorney for University of North Florida, 1300 Building, 1300 Gulf Life Drive, Jacksonville, Florida 32207 and Clare E. Gray, Attorney for St. Johns River Water Management District, Post Office Box 1429, Palatka, Florida 32178-1429 by U. S. mail this 15<sup>th</sup> day of August, 1990.



TIMOTHY KEYSER, ATTORNEY

STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

TERESA BURKITT,

Petitioner,

v.

DOAH CASE NO. 90-003232

UNIVERSITY OF NORTH FLORIDA  
and ST. JOHNS RIVER WATER  
MANAGEMENT DISTRICT,

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CATHLENE DENNY,

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UNIVERSITY OF NORTH FLORIDA  
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UNIVERSITY OF NORTH FLORIDA  
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MANAGEMENT DISTRICT,

SJRWMD FILE OF RECORD  
NO. 90-916C

Respondents.

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AMENDMENT TO PETITIONERS ANSWERS TO UNIVERSITY  
OF NORTH FLORIDA'S FIRST REQUEST FOR ADMISSIONS

All petitioners responded to the UNIVERISTY OF NORTH

FLORIDA'S first request for admissions on August 2, 1990, as given below but now amend the caption.

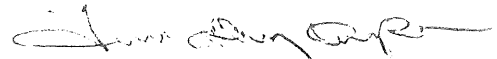
1. Petitioners admit paragraphs 1 through 5, (hereafter indicated by - ), 14, 21, 25 - 27, 33 - 37, 43, 45 - 47, 50 - 64, 66, 68, 70 -73, 80 - 82, 85 - 86, 90 - 91, 96 - 104, 149, 151 - 153.

2. Petitioners deny paragraphs 13, 16, 17, 21 - 24, 28 -32, 38 - 42, 44, 48, 49, 74 - 78, 79, 83 - 84, 87 -88, 92 - 95, 108 - 139,

3. Petitioners are unable to admit or deny the following paragraphs because they have not been given sufficient information to respond despite several attempts to get such information: 6 - 12, 15, 18 - 20, 65, 67, 69, 89, 105 - 107, 140 - 143, 154.

4. Petitioners object to the following request on the ground stated:

Objection, irrelevant because the requests in 144 - 148 and 150 do not refer to the specific works as issue.



TIMOTHY KEYSER  
Attorney for Petitioners  
Florida Bar No.: 181740  
Post Office Box 92  
Interlachen, Florida 32148  
(904) 684-4673

CERTIFICATE OF SERVICE

I CERTIFY that a copy hereof has been furnished to Marcia P. Parker, Attorney for University of North Florida, 1300 Building, 1300 Gulf Life Drive, Jacksonville, Florida 32207 and Clare E. Gray, Attorney for St. Johns River Water Management District, Post Office Box 1429, Palatka, Florida 32178-1429 by U. S. mail this 5<sup>th</sup> day of August, 1990.

  
TIMOTHY KEYSER, ATTORNEY