

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 9:20-cv-81163-MIDDLEBROOKS/BRANNON

JEFFREY LAGRASSO and
DEBORAH LAGRASSO,

Plaintiffs,

vs.

SEVEN BRIDGES HOMEOWNERS
ASSOCIATION, INC., a Florida
corporation, and RACHEL ABOUD
TANNENHOLZ,

Defendants.

**DEFENDANT, SEVEN BRIDGES HOMEOWNERS ASSOCIATION, INC.'S, FACT
WITNESS LIST**

COME NOW, the Defendant, SEVEN BRIDGES HOMEOWNERS ASSOCIATION, INC. (hereinafter known as "ASSOCIATION"), by and through its undersigned Counsel, pursuant to this Court's Pretrial Scheduling Order dated August 20, 2020, and hereby discloses the following Fact Witnesses:

1. Elana Andrews, Member of the ASSOCIATION and member of the Tennis League
9542 Eden Roc Court
Delray, FL 33446
2. Kirac Bekisoglu, Former Tennis Pro Coach at the ASSOCIATION
9759 Vitrail Lane
Delray Beach, Florida 33446
3. Mehmet Bekisoglu, Former Secretary of the ASSOCIATION's Board of Directors
9759 Vitrail Lane
Delray Beach, FL 33446
4. Melissa Darnell, Member of the ASSOCIATION's Compliance Committee
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408

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5. Elana Ecker, Member of the ASSOCIATION and member of the Tennis League
9786 Montpellier Drive
Delray, FL 33446
6. Eric Godin, Tennis Director of the ASSOCIATION
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
7. Arleen Goldenberg, Secretary and Treasurer of the ASSOCIATION's Board of Directors
c/o Vernis and Bowling of Palm Beach, P.A.
885 U.S. Highway One
North Palm Beach, FL 33408
8. Helen Harris, Member of the ASSOCIATION and member of the Tennis League
16700 Strasbourg Ln
Delray Beach, FL 33446
9. George Kramer, Vice-President of the ASSOCIATION's Board of Directors
c/o Vernis and Bowling of Palm Beach, P.A.
886 U.S. Highway One
North Palm Beach, FL 33408
10. Deborah LaGrasso, Plaintiff
c/o Murdoch Weires, PLLC
14 Southeast 4th Street
Boca Raton, FL 33432
11. Jeffrey LaGrasso, Plaintiff
c/o Murdoch Weires, PLLC
14 Southeast 4th Street
Boca Raton, FL 33432
12. Eleonora Lannozi, Tennis Pro Coach at the ASSOCIATION
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
13. Gloria Lorenz, Member of the ASSOCIATION and member of the Tennis League
16764 Strasbourg Ln
Delray Beach, FL 33446

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14. Nicole Martin, Member of the ASSOCIATION and member of the Tennis League
16674 Couture Court
Delray, FL 33446
15. Linda Martin, Member of the Tennis League
Address Unknown
16. Platinum Group Security, Security Company employed by the ASSOCIATION
212 N. Federal Hwy
Deerfield Beach, FL 33411
17. Lawrence Orbach, President of the ASSOCIATION's Board of Directors
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
18. Nelda Raful, Member of the ASSOCIATION and member of the Tennis League
16262 Pantheon Pass
Delray Beach, FL 33446.
19. George Spencer, Member of the ASSOCIATION's Compliance Committee
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
20. Rachel Stricoff, Member of the ASSOCIATION's Compliance Committee
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
21. Bruce Lyle Tannenholz, Husband of Co-Defendant Tannenholz
9120 Moriset Ct, Delray Beach, FL 33446
22. Rachel Abound Tannenholz, Co-Defendant
c/o Debra D. Klingsberg, Esq.
3950 NW 53rd Street
Boca Raton, FL 33496
23. Roman Turtygin, Former Tennis Pro Coach of the ASSOCIATION
715 SW 17th Ave, Suite 1612
Delray Beach, FL 33444

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24. Matthew Weiss, Former President of the ASSOCIATION's Board of Directors
16825 Pierre Cir.
Delray Beach, FL 33446
25. Edna Willis, Member of the ASSOCIATION's Compliance Committee
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
26. Heidi Womack, Property Manager of the ASSOCIATION
c/o Vernis and Bowling of Palm Beach, P.A.
884 U.S. Highway One
North Palm Beach, FL 33408
27. Tawny Young, Member of the ASSOCIATION and member of the Tennis League
9856 Rennes Ln
Delray Beach, FL 33446
28. All persons whose deposition have been or will be taken in this action.
29. Any and all Record Custodians.
30. Any and all person mentioned in the pleadings, depositions, Interrogatories and Answers to same, and Request for Production and Responses to same.
31. Any non-objectionable witness listed by the Plaintiffs.
32. Any non-objectionable witness listed by Co-Defendants Rachel Abound Tannenholz.
33. All witnesses required for impeachment.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 14, 2020, I electronically filed the foregoing documents with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronically Filing generated by CM/ECF or in some other authorized manner for those Counsel or Parties who are not authorized to receive electronically Notice of Electronic Filing.

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/s/ Karen M. Nissen
KAREN M. NISSEN, ESQ.
Florida Bar No. 0883761
JOSEF M. FIALA, ESQ.
Florida Bar No. 707570

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SERVICE LIST

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<p>Scott A. Weires, Esq. <i>Attorney for Plaintiffs</i> Murdoch Weires, PLLC 14 SE 4th Street, Suite 36 Boca Raton, FL 33432 Telephone No. (561) 347-8700 sweires@mwnlegal.com jliotta@mwnlegal.com</p>	<p>Debra D. Klingsberg, Esq. <i>Attorney for Rachel Tannenzholz</i> Law Offices of Debra D. Klingsberg 3950 NW 53rd Street Boca Raton, FL 33496 Telephon No. (561) 306-7684 dklingsberglaw@gmail.com</p>
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