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BEFORE THE STATE OF FLORIDA DIVISION OF ADMINISTRATIVE
HEARINGS

CITIZENS FOR PETS IN	)	
CONDOS, INC.	)	
Petitioner	)	
&	)	
	)	
M.B.F.	)	CASE NO.11-6398 RU
Petitioner	)	
	)	
v.	)	
FLORIDA COMMISSION ON	)	
HUMAN RELATIONS	)	
Respondent	)	
_____	/	

**PETITIONERS' RESPONSE TO RESPONDENT FLORIDA COMMISSION ON
HUMAN RELATION'S "MOTION TO QUASH/MOTION FOR PROTECTIVE
ORDER" and REQUEST FOR STATUS CONFERENCE**

Petitioners, by and through undersigned, responds to the Florida Commission on Human Relation's "Motion to Quash/Motion for Protective Order" as follows:

1. Respondent seeks to prevent the Petitioners from taking the deposition of Sarah Stewart, asserting that Ms. Stewart has no knowledge of "the facts and circumstances alleged in, or that forms the basis of the complaint, all information having been obtained strictly through her involvement as a Legal Representative for the Respondent."
2. Petitioners have noticed Sarah Stewart for deposition because the answers to the interrogatories served by Petitioners in this in this matter were signed by Sarah Stewart, which presumably means that Ms. Stewart has personal knowledge regarding the assertions contained therein.

3. The basis of the assertions made in the Respondent's answers to interrogatories is a legitimate matter of deposition inquiry, and by having attested to the veracity of the answers, Ms. Stewart became the appropriate deponent.
4. Petitioners respectfully request a status conference to address various issues related to the final hearing in this matter, most notably, a deadline for exchanging exhibit lists, witness lists and filing the pre-hearing stipulation.
- 5.

RESPECTFULLY SUBMITTED this 6th day of February, 2012.

_____s_____

Marcy I. LaHart, Esquire
Attorney for Petitioners
4804 SW 45th Street
Gainesville, FL 32608
Florida Bar No. 0967009
(352) 224-5699

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Transmission to Larry Kranert, Esq. and Sarah Stewart, Esq., Florida Commission on Human Relations, 2009 Apalachee Parkway, Suite 100, Tallahassee, FL 32301-4857 on this 6th day of February, 2012

.

_____s_____

Marcy LaHart, Esq.

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