

IN THE COUNTY COURT OF THE
TWENTIETH JUDICIAL CIRCUIT IN AND
FOR LEE COUNTY, FLORIDA

CASE NO. 2018-SC-001768

David Edward Howe,

Plaintiff,

v.

Enterprise Holdings, Inc.,

Defendant.

**NOTICE OF NON-PARTY, NATIONAL CAR RENTAL'S, OBJECTION TO
SUBPOENA DUCES TECUM FOR PRODUCTION OF DOCUMENTS WITHOUT
DEPOSITION, PURSUANT TO FLA. R. CIV. P. 1.351**

COMES NOW, NATIONAL CAR RENTAL ("National"), by and through undersigned counsel, and pursuant to Fla. R. Civ. P. 1.351, files this Objection to Plaintiff's Subpoena Duces Tecum for Production of Documents without Deposition, dated May 30, 2018, and states:

Entire and complete detail report associated with the 'VEHICLE ON HOLD', Vehicle # GU214531, associated with RA 439620019, dated 29-OCT2016 01:57 PM, 2016 Toyota, Avalon, silver in color.

Response:

National objects to the Subpoena Duces Tecum for Production of Documents without Deposition, dated May 30, 2018, as vague, irrelevant and overbroad as to "entire and complete detail report," not reasonably limited in time and scope, and not reasonably calculated to lead to the discovery of admissible evidence. See *Buckley Development Co. v. Targin*, 270 So. 2d 433 (Fla. 3d DCA 1972) (if the description of

the items sought is too broad and lack the sufficient specificity necessary for one to know what is demanded, no action can be taken against a party for his failure to produce the uncertain items).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 11, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system. I further certify that a true and correct copy hereof has been furnished via email to: deh@davidhowe.com.

/s/Howard L. Citron
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