

IN THE CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY

PATRICK McNALLY,

Case Number:

Plaintiff,

vs.

CITY OF NORTH MIAMI, a Florida
municipal corporation,

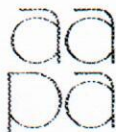
Defendants.

Plaintiff's First Rule 1.350 Request for Production

Plaintiff, Patrick McNally, pursuant to Florida Rule of Civil Procedure 1.350, requests the defendant, City of North Miami, to produce within the time permitted by the rules the following documents for inspection and copying at the place where they are regularly maintained in the course of business (or to deliver them by that time and date to Amlong & Amlong, P.A., 500 Northeast Fourth Street, Fort Lauderdale, FL 33301-1154, labeled to indicate the item number to which they are responsive):

1. Any file(s) (e.g., personnel or, if separate, disciplinary)
maintained by the City of North Miami concerning:

- a. Patrick McNally;
- b. Gary Eugene;
- c. Rafael Estrugo;



- d. Emile Hollant;
- e. Angelo Brinson;
- f. Angel Rivera,
- g. Tim Belcher, or
- h. Donald Blanchard.

2. Any and all documents, including but not limited to correspondence, archived electronic correspondence (to be replicated electronically in its native format, including meta data), or internal memoranda to or from any employee or official of the City of North Miami from January 1, 2016 until the date of your response concerning:

- a. the selection of Gary Eugene as:
 - i. Interim Chief of Police, or
 - ii. Chief of Police;
- b. the termination of Gary Eugene as Chief of Police;
- c. the promotion to major of:
 - i. Tim Belcher, or
 - ii. Donald Blanchard;
- d. the promotions to commander of:
 - i. Rafael Estrugo;
 - ii. Emile Hollant;
 - iii. Angelo Brinson.

3. Any documents identified in response to any of the plaintiff's first set of interrogatories.

4. Any insurance policy that may provide coverage for the actions alleged in this complaint, e.g., an employment practices liability insurance.

5. All documents, including but not limited to correspondence, archived electronic correspondence (to be replicated electronically in native format, including meta data), or internal memoranda regarding the qualifications or position description for commander in effect June 26, 2016.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on defendant along with the summons and complaint.

/s/ William R. Amlong
WILLIAM R. AMLONG
Florida Bar No. 470228
WRamlong@TheAmlongFirm.com
KAREN COOLMAN AMLONG
Florida Bar No. 275565
KAmlong@TheAmlongFirm.com
JENNIFER DALEY
Florida Bar No. 0856436
JDaley@TheAmlongFirm.com

AMLONG & AMLONG, P.A.
Attorneys for Plaintiff
500 Northeast Fourth Street
Second Floor
Fort Lauderdale, FL 33301-1154
Telephone: (954)462-1983

***Attorneys for the Plaintiff,
Patrick McNally***