

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2019-CA-013860-XXXX-MB

GABE HOFFMAN, an individual,

Plaintiff,

v.

THOMAS SCHOENBERGER, an individual,

Defendant.

NON-PARTY, ASHLEY REAGAN EARLY'S MOTION FOR PROTECTIVE ORDER

COMES NOW, Non-Party ASHLEY REGAN EARLY, ("Non-Party"), by and through her undersigned attorney, and moves the Court for a Protective Order from the Subpoena *Duces Tecum* filed and served on Non-Party by Plaintiff GABE HOFFMAN, and in support of same would allege:

1. On or about August 5, 2020, Non-Party was served with a Subpoena *Duces Tecum* ("Subpoena"). A true and correct copy of the Subpoena is attached hereto as Exhibit "A".

2. The documentation requested by Plaintiff is unduly burdensome. Non-Party further objects to the extent the request seeks the production of items not reasonably calculated to lead to the discovery of admissible, or useful, evidence. Moreover, Non-Party objects to these requests insofar as they call for or potentially call for the production of items that are private, confidential, and are not subject to the applicable rules of discovery. Non-Party submits these objections without conceding the relevancy or materiality of the subject matter of the request or that any responsive material exists.

3. In fact, the production sought by Plaintiff is not relevant, and is unnecessarily oppressive. The requests are being made solely for the purposes of harassment, annoyance, and simple financial terrorism.

4. Non-Party has retained the undersigned attorney and has agreed to pay him a reasonable fee and costs for these services. Non-Party should be reimbursed by Plaintiff for those reasonable and necessary attorney's fees and costs pursuant to applicable Florida Statutes. Plaintiff should be taxed with these attorney's fees, costs, and/or any other appropriate sanctions.

WHEREFORE, Non-Party ASHLEY REAGAN EARLY moves and respectfully requests this Court to enter an Order:

- A. Granting her request for a Protective Order;
- B. Awarding Non-Party all of her reasonable and necessary attorney's fees and costs associated with this Motion as well as any hearing(s) that may result; and
- C. Granting Non-Party any further relief or protection from Plaintiff that the Court deems necessary and proper under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was e-filed and e-served to Dennis S. Klein, Esquire, Attorney for Plaintiff, at dklein@kelleykronenberg.com, and Thomas Schoenberger, pro se Defendant, at tstgerl3@gmail.com on this 14th day of August, 2020.

Respectfully Submitted,



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