

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

In re:

Case No. 8:24-bk-00676-RCT

THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.,

Chapter 11

Debtor.

MICHAEL GOLDBERG, as Chapter 11 Trustee
of the estate of Debtor, The Center for
Special Needs Trust Administration, Inc.

Adversary No. 8:25-ap-00006-RCT

Plaintiff,

v.

ARTSPACE PROPERTIES LLC,

Defendant.

**SECOND AMENDED NOTICE OF TAKING
VIDEOTAPED DEPOSITION DUCES TECUM**

PLEASE TAKE NOTICE that pursuant to Rules 9014 and 7030, Federal Rules of Bankruptcy Procedure, on **Friday, May 30, 2025, at 10:00 a.m. ET**, or soon thereafter, counsel for Plaintiff, Michael Goldberg, as Chapter 11 Trustee of the estate of Debtor, The Center for Special Needs Trust Administration, Inc., will take the videotaped deposition of **Beth Sauer** via Zoom (link below), before Esquire Deposition Solutions or any other Notary Public or officer authorized by law to take depositions. The deposition will be recorded by Zoom. This deposition is being taken for discovery purposes, for use at hearing or trial, or both, and shall continue from day to day until completed.

Akerman LLP shall serve as the host of the video conference as follows:

<https://akerman.zoom.us/j/8387352139?omn=83573432765>

Meeting ID: 838 735 2139

To attend remotely via Zoom videoconferencing, you will need a desktop computer or laptop with a webcam in order to be seen, speakers to hear the other parties connected and a microphone to be heard.

The deponent shall on or before **May 28**, 2025, at 4:00 p.m. provide all documents listed on Schedule A attached by hard copy or via email to john.dicks@akerman.com.

Dated: May 20, 2025

AKERMAN LLP

By: /s/ John L. Dicks II

John L. Dicks II

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*Counsel for Chapter 11 Trustee, Michael
Goldberg*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 20, 2025, I filed a true and correct copy of the foregoing with the United States Bankruptcy Court for the Middle District of Florida using the Court's CM/ECF system, which will serve copies on all counsel of record and that a true and correct copy of the foregoing was sent by U.S. Mail, postage prepaid and properly addressed, to:

Artspace Properties LLC
Attn. its Registered Agent,
Leo Joseph Govoni
12707 49th Street N., Suite 200
Clearwater, FL 33762

Artspace Properties LLC
Attn. its Manager, Leo J. Govoni
12707 49th Street N., Suite 300
Clearwater, FL 33762

Artspace Properties LLC
Attn. its Registered Agent, Leo Joseph Govoni
4912 Creekside Drive
Clearwater, FL 33760

/s/ John L. Dicks II
Attorney

SCHEDULE A

DEFINITIONS

1. The "**Petition Date**" shall mean February 9, 2024.
2. "**You**", "**your**" or "**yours**" shall mean Beth Sauer individually or in her capacity as acting on behalf of any other party or entity.
3. "**Document**" or "**documents**" as used herein shall mean the original and any copy, regardless of its origin and location, of all writings of any kind whatsoever including, but not limited to, all abstracts, accounting journals, accounting ledgers, advertisements, affidavits, agendas, agreements or proposed agreements, analyses, appointment books, appraisals, articles of incorporation, balance sheets, bank checks, bank deposit or withdrawal slips, bank credit or debit memoranda, bank statements, blueprints, books, books of account, budgets, bulletins, bylaws, canceled checks, charts, checks, codes, communications, communications with government bodies, computer data or printouts, conferences, contracts, correspondence, electronic mail, data processing cards, data sheets, desk calendars, details, diagrams, diaries, disks or data compilations from which information can be obtained or translated, drafts, drawings, electromagnetic tapes, **Electronically Stored Information** (as defined below), files, films, financial calculations, financial projections, financial statements, graphs, handwritten notes or comments however produced or reproduced, indexes, insertions, instructions, internal accounting records, interoffice communications, invoices, ledgers, letters, lists, logbooks, manuals, memoranda, microfilm, minutes of meetings, motion pictures, newspaper or magazine articles, networks, nonconforming copies which contain deletions, notations or records of meetings, notes, notices of wire transfer of funds, outlines, pamphlets, papers, passbooks, periodicals, photocopies, photographs, pictures, plans, preliminary drafts, press releases, proposals, publications, punch cards, raw and refined data, receipts, recommendations,

records, records of conferences or conversations or meetings, records of payment, reports, resolutions, results of investigations, schedules, schematics, sepia, shipping papers, slides, specifications, speeches, statements of account, studies, summaries, surveys, tape recordings, tax returns, telegrams, telephone logs and records, telephone and other conversations or communications, teletypes, telexes, transcripts, transcripts of tape recordings, video tapes, voice records, vouchers, work papers, worksheets, written notations, and any and all other papers similar to any of the foregoing. Any document containing thereon or attached thereto any alterations, comments, notes or other material not included in the copies or originals or referred to in the preceding definition shall be deemed a separate document within said definition. Any document shall include all exhibits, schedules or other writings affected by or referenced in any such document or other writings necessary to complete the information contained therein or make it not misleading.

4. **"Electronically Stored Information"** or **"ESI"** as used herein shall mean the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmission notations or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, or other means. Electronically stored information includes, by way of example only, computer programs (whether private, commercial or work-in-progress), programming notes or instructions, activity listing of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PDF files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether said electronic information consists in an active file, deleted file or file

fragment. Electronically stored information includes any and all items stored on computer memories, hard disks, floppy disks, CD-ROMs, removable media such as Bernoulli Boxes and their equivalent, magnetic tapes of all types, microfiche, punched cards, punched tape, computer chips, including, but not limited to EPROM, PROM, RAM and ROM, on or in any other vehicle for digital information storage and/or transmittal. Electronically stored information also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

5. "**Communication**" means every manner of means of disclosure, transfer, or exchange of information, whether in person, by telephone, mail, email, chat, instant message, text message, personal delivery, or otherwise, including any oral or written statement, dialogue, colloquy, discussion or conversation, and also means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.

6. If not expressly stated otherwise, "**control**" means in your possession, custody, or control or under your direction, and includes in the possession, custody or control of those under the direction of you or your employees, subordinates, counsel, accountant, consultant, expert, parent or affiliated corporation, and any person purporting to act on your behalf.

7. "**Relating to**" or "**related to**" means to directly or indirectly refer to, reflect, describe, pertain to, arise out of or in connection with, or in any way legally, logically, or factually be connected with, or tend to prove or disprove, the matter discussed.

INSTRUCTIONS

Compliance with this request should be made in accordance with the following:

A. If you at any time had possession, custody or control of a document falling within this Request and if such document has been lost, destroyed, purged, or is not presently in your possession, custody or control, please describe the document, the date of its loss, destruction, purge, or separation from possession, custody or control and the circumstances surrounding its loss, destruction, purge, or separation from possession, custody or control.

B. All documents produced pursuant to this request are to be produced as they are maintained in the ordinary course of business or shall be organized and labeled (without permanently marking the item produced) to correspond with the categories of each individual request to which each document applies. For all ESI, please produce same in its native format with accompanying metadata.

C. The singular form of a word shall be interpreted in the plural, and vice versa, as may be necessary to bring within the scope of this request all documents that might otherwise be construed to be outside the scope of this request.

D. The words "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any responses to interrogatories, documents, or communications, that might otherwise be construed to be outside the scope of this request.

E. If any information required to be produced in response to any request is withheld because you claim such information is privileged or is contained in a privileged document, please identify the following with respect to each such document:

- i. the nature of the privilege which is being claimed;
- ii. the type of document;

- iii. the general subject matter of the document;
- iv. the date of the document;
- v. the author of the document;
- vi. the addressee of the document; and
- vii. where not apparent, the relationship of the author to the addressee.

F. This request is continuing, and any document obtained or located subsequent to the production which would have been produced had it been available or its existence known at the time is to be supplied forthwith.

DOCUMENTS TO BE PRODUCED

1. All documents relating your possessory interest, if any, in the house located at 2637 Westview Court, Clearwater, Florida (including leases, if any, and documents regarding rent payments, if any).
2. All documents relating to Artspace Properties, LLC.
3. All documents relating to Boston Asset Management, Inc.