

LITIGATION SUMMARY
As Of November 9, 2023

(This summary is based on my understanding of events and should not be considered to be a professional legal opinion. To illustrate “summary”, on November 11, 2023 we have 815 litigation emails and 903 litigation files consisting of thousands of pages of documents, spread sheets, data bases, photos, filings, summaries, etc.)

All court documents related to our case can be found at:

<https://courtcasesearch.stlucieclerk.gov/BenchmarkWebExternal/Home.aspx/Search>

Our case number is: 2022CA001626

August 31, 2022 **Complaint filed in 19th Circuit Court by three Spanish Lakes parks: Country Club, Golf Village, and Spanish Lakes 1**

- Complaint listed 5 rent increase issues and 14 failures to maintain issues

October 10, 2022 **Wynnes filed motion to dismiss**

- Motion argued that the three parks must file separate lawsuits (be severed) – this would prohibit the parks from sharing legal costs and basically triple the legal cost for each park

December 2, 2022 **Judge’s hearing on motions held at 19th Circuit Court**

- Judge ruled that lawsuits must be severed if maintenance issues are included but can remain joined if suing for rent issues only. The three parks decided to drop the maintenance issues (for now) and only litigate for rent issues in order to remain joined. (The maintenance issues are real and are not forgotten and will be dealt with later.)

January 17, 2023 **Amended complaint was filed by the three parks**

- We are now litigating for the five rent issues only
- 1. Should the 2001 rent increase be 3.5% for everyone?
- 2. Should rent increases be the same percentage for everyone in a 12-month period?
- 3. Does non-uniform rent increases violate past practice?
- 4. Is the use of non-uniform measuring dates arbitrary and/or discriminatory?
- 5. Did the park owners raise rents retroactively?

January 27, 2023 **Amended complaint answered by Wynnes**

- Basically, the Wynnes denied every thing we said in the complaint

February 21, 2023

We responded to the Wynne's answer

- We reinforced and reaffirmed the issues in our amended complaint

May 19, 2023

Wynne's motion for summary judgement

- This was an attempt to say that our lawsuit had no merit, our complaints could not be substantiated, and that the judge should therefore dismiss the case in the Wynne's favor.

July 26, 2023

We responded to the Wynne's motion for summary judgement

- We made additional arguments to show that our lawsuit was valid, to support our complaints, and demonstrate that our case should not be dismissed.

August 18, 2023

Judge's hearing on Wynne motion to dismiss

- A hearing was held at the 19th Circuit Court. The attorneys attended and argued remotely. Representatives of the three parks attended in person.

August 29, 2023

Judge's written order on the hearing

- The judge said the Wynnes did not provide any case law or evidence to support their position. He ruled that everyone in the park get the same percent increase for the annual 12-month rent period. He deferred ruling on the other rent issues until trial. The Wynne's motion to dismiss our case was denied. ***This is a victory and suggests more good verdicts to come.***

September 13, 2023

Wynne motion to overturn judge's order

- This motion basically says the judge misinterpreted the law and therefore made a mistake in his ruling and should reverse himself.

September 29, 2023

Our response to overturn motion

- We reinforced our arguments.

November 1, 2023

Wynnes replied to our response

- Unbelievably, the Wynnes gave the judge a lesson in English grammar in an attempt to convince him that he didn't read what he read.

Currently

Waiting for the judge to make a ruling.