

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,  
IN AND FOR VOLUSIA COUNTY, FLORIDA

BELVEDERE TERMINALS  
COMPANY, LLC, a Delaware  
limited liability company,

Plaintiff,

Case No.: 2024-10007-CICI

v.

VOLUSIA COUNTY, a political subdivision  
of the State of Florida,

Defendant.

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**DEFENDANT VOLUSIA COUNTY'S**  
**REQUEST TO PRODUCE TO PLAINTIFF**

Defendant, Volusia County, pursuant to Fla. R. Civ. P. 1.350, requests Plaintiff to produce documents listed below for inspection and/or copying. The term “documents” includes electronically stored information, writings, drawings, graphs, charts, photographs, audio, visual, and audiovisual recordings, and other data compilations in the possession, custody, or control of Plaintiff.

1. All documents evincing Plaintiff’s “interest in the property at issue in this case” as alleged in paragraph 5 of the Complaint and Petition for Writ of Mandamus, including but not limited to any lease, contract or other document conveying a property interest in the “Property” on Hull Road.

2. All documents evincing that “Plaintiff has contracted with the current fee owner of the Property for the right to develop and operate a refined products terminal on

the Property” as alleged in paragraph 22 of the Complaint and Petition for Writ of Mandamus.

3. All documents evincing any contract or description of any joint business venture involving Plaintiff and FEC Railroad or either of their parent or subsidiary companies.

4. All documents evincing an “approved [] Final Site Plan for the 2005 Concrete Facility” as alleged in paragraph 14 of the Complaint and Petition for Writ of Mandamus.

5. All documents, including but not limited to invoices, bills, or other statements evincing the “amounts of money [Plaintiff] has expended to pursue development of the Project on the Property” as indicated in paragraph 161 of the Complaint and Petition for Writ of Mandamus.

6. All documents, including but not limited to emails, letters, and memoranda generated by Plaintiff after August 1, 2023, referencing Volusia County, the “Property” on Hull Road, and the refined products terminal “Project” as described in the Complaint and Petition for Writ of Mandamus.

7. All documents evincing that Plaintiff began working on its conceptual site plan for the Project before August 1, 2023.

It is requested that said records be produced at the County Legal Department, 123 W. Indiana Avenue, DeLand, Florida, on or before thirty (30) days from the date of service hereof or that copies of said documents be mailed to the County Legal Department on or before thirty (30) days from the service hereof.

If any document is withheld on any claim of privilege, or otherwise, set forth the following:

- (1) The basis of the privilege claims;
- (2) The author of the document;
- (3) The date of the document;
- (4) The recipient or intended recipient of the document;
- (5) A brief description of the substance of the document;
- (6) All persons who received copies of the document or were shown copies of the document, along with an identification of each such person.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing has been e-filed with the Clerk of Court via the eFiling Portal which will send notice of filing and an electronic copy to Nick Dancaescu, Esq./Rachael Crews, Esq./William T. Dove, Esq., 301 E. Pine Street, Ste. 1400, Orlando, Florida 32801 ([nick.dancaescu@gray-robinson.com](mailto:nick.dancaescu@gray-robinson.com)) ([donna.flynn@gray-robinson.com](mailto:donna.flynn@gray-robinson.com)) ([mariah.richardson@gray-robinson.com](mailto:mariah.richardson@gray-robinson.com)) ([rachael.crews@gray-robinson.com](mailto:rachael.crews@gray-robinson.com)) ([jamal.wilson@gray-robinson.com](mailto:jamal.wilson@gray-robinson.com)) ([billy.dove@gray-robinson.com](mailto:billy.dove@gray-robinson.com)) on January 19, 2024.

/s/ W. Kevin Bledsoe  
W. Kevin Bledsoe  
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