

IN THE CIRCUIT COURT OF THE TWENTIETH, JUDICIAL CIRCUIT
IN AND FOR LEE COUNTY FLORIDA

CASE NO: 15-031538DR N
DIVISION: DOMESTIC VIOLENCE

Frederic A Blum)
Petitioner)
)
v.)
)
Randy A Scott)
Respondent)

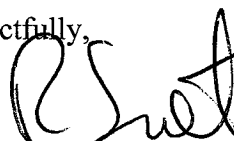
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**MOTION AND NOTICE OF RESPONDENTS FIRST SET OF INTERROGATORIES
TO FREDERIC A BLUM**

NOW COME RESPONDENT MOVING THE COURT to compel petitioner to complete the interrogatories by the September 7, 2015 delivered to respondent. Pursuant to Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, Respondent Randy A Scott, propounds the attached First Set of Interrogatories to Frederic A Blum to be answered in writing and under oath in the form and manner prescribed by the Florida Rules of Civil Procedure.

August 31, 2015

Respectfully,



Randy A Scott
343 Hazelwood Ave S
Lehigh Acres , Florida 33936
randy@randyscott.us
239.300.7007

FILED LEE CO. FLORIDA
CLERK OF COURTS

2015 AUG 31 AM 10:56

D.C.
BY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and the foregoing was filed in the Lee County Clerk of Courts office. AND hand delivered directed at Jennifer Gutmore to 1625 Hendry Street, Third Floor, Fort Myers, FL 33901 also on this day directed at jgutmore@knott-law.com.

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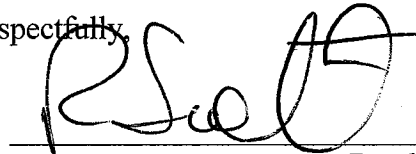
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RESPONDENTS FIRST SET OF INTERROGATORIES TO FREDERIC A BLUM

Pursuant to Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, Respondent Randy A Scott, propounds the attached First Set of Interrogatories to Frederic A Blum to be answered in writing and under oath in the form and manner prescribed by the Florida Rules of Civil Procedure.

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DEFINITIONS

For purposes of these Interrogatories, the following definitions apply:

1. The term "you," "your," or "petitioner" refers to Frederic A Blum.
2. The term "County" or "respondent" refers to Randy A Scott.
3. The term "Complaint" refers to your petition.
4. Capitalized terms not defined here shall have the same meaning as those terms have in the petition.
5. The phrase "describe in detail" means to recite the information in your possession for each separate and distinct act, instance, occurrence, or communication, including the date, location and identity of each and every person present or involved and the identity of each and every communication and each and every document which relates to the act, instance, occurrence or communication.
6. The term "document" means the original and any copy whether different from the original by reason of any notation made on such copies or otherwise, regardless of the origin or location, of any written, recorded, transcribed, taped, filed or graphic matter, however produced or reproduced, including but not limited to any correspondence, telegram, book, letter, memorandum, notes, diaries, statistics, minutes, contracts, studies, checks, statements, receipts, returns, summaries, pamphlets, prospectuses, interoffice and intraoffice telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices, worksheets (and all drafts, alterations, modifications or changes to any of the foregoing); graphic and oral records or representations of any kind, including without limitation, photographs, charts, graphs, microfiche, microfilm, video tape recordings, motion pictures, electronic, mechanical, or electrical records or representations of any kind, including without limitation, tapes, cassettes, discs and recordings.
7. The term "all documents" means any document as above defined known to you and every such document which can be located or discovered by reasonably diligent efforts.
8. The term "communication" means any oral or written utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including but not limited to correspondence, conversations, dialogues, discussions, interviews, meetings, consultations, agreements, and other understandings between or among two or more people.
9. The term "identify" or "identity" when used in reference to:
 - a. A natural individual, means to state his or her full name, title, residential and business addresses, and telephone numbers;
 - b. A corporation, means to state its full corporate name and any names under which it does business, state of incorporation, the address of its principal place of business, and the address of all its officers in Florida;
 - c. A business, means to state the full name or style under which the business is conducted, its business address or addresses, the types of businesses in which it is engaged, the geographic areas in which it conducts those businesses, and the identity of the person or persons who own, operate and control the business;
 - d. A document, means to state the number of pages and the nature of the document (e.g., letter or memorandum), its title, date, the name or names of its author(s) and recipient(s) and its present location and custodian(s);
 - e. A communication, if any part of the communication is written, means to identify the document(s) which refers to or evidences the communication, and, to the extent that the

communication was unwritten, to identify the persons participating in the communication and to state the date, manner, place and substance of the communication.

10. The term "state the basis" means to state in your answer each and every fact and legal theory that you think relates to the claim, contention, allegation, or response.
11. The term "person" means any natural person, corporation, partnership, proprietorship, association, organization, or group of natural persons.
12. The term "relating to" or "relates to" means in any way directly or indirectly, concerning, referring to, disclosing, describing, confirming, supporting, evidencing, or representing.
13. The term "representative" means any and all present and former agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.
14. The term "telephone numbers" refers to home, business, facsimile, and cellular telephone numbers.
15. The terms "and" and "or," as used herein, are both conjunctive and disjunctive.
16. All singular words include the plural, and all plural words include the singular.
17. All words in the present tense include the past, and all words in the past tense include the present.

INSTRUCTIONS

18. Each Interrogatory and part thereof, shall be answered separately, fully and completely, without reference to any answer of any other Interrogatory.
19. Unless otherwise indicated, the relevant time period referred to in these Interrogatories is from 1982 to present.
20. With respect to information or documents as to which you may claim privilege, attorney's work product or trial preparation materials, you are requested to identify each such document, in writing, on or before the date of the production set forth herein, together with the following information: the nature, date, subject matter and author of the document, as well as the identity of all persons to whom the document was directed, addressed or received, and the paragraphs of the discovery requests to which the document corresponds. For each such document, you are further required to state the basis for your claim of privilege, attorney's work product, or trial preparation materials.

INTERROGATORIES

1. What is the name, address and telephone number of the person or persons participating in the answering of these interrogatories? For each person, if applicable, list the person's official position or relationship with the party to whom the interrogatories are directed, as well as the number of each interrogatory which the person participated in answering.
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2. Where did you obtain the form titled "PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING PURSUANT TO FLORIDA STATUTE 784.0485." that was filed and began this case.

3. Did you have any assistance in filing out the "PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING PURSUANT TO FLORIDA STATUTE 784.0485." if so list name and address of those assisting you with the form.

4. In the PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING PURSUANT TO FLORIDA STATUTE 784.0485 you developed personal data for respondent. Specifically you answered some questions such as birth date, aliases, height and weight. Since this was not an intimate domestic relationship and parties would not have this

information readily available please describe with particularity where and how and by whom and what means you obtained this information.

5. Identify any and all past or present employees, past or present NAPPS members, past or present NAPPS state association members, past or present all people, past or present investigators who have worked on, or have knowledge of, the matters identified in the Complaint. For each person, state their address, telephone number, if any job description, general responsibilities in the lawsuit, and any work performed in relation to the events described, gathered, retrieved, pretexted and or interacted with the respondent on your behalf to the matters in the Complaint. Include the dates of hire, dates of contract and payments received or made if any for such services. If no payments received state none paid.

6. State the method of communication to all the parties listed in interrogatory #5. For example, email, text message, telephone, USPS mail, the date and time of each communication and the content of the communication(s) including

attachments: _____

7. Now we are referring to your exhibits and their associated numbers. For the ones delivered from respondent directly to your email, your fax, your mailing address, your fax , hand delivered please list the exhibit number that was emailed, faxed, telephoned, messaged or USPS mailed hand delivered to you directly by the respondent to you.

8. Staying with the exhibits. Did Gina Sharbowski, Mike Compton, Andy Estin, James Lowery and/or Larry write tell you Randy Scott directed them to direct at you the electronic communications?

9. This question is directly from the operative and current Florida Supreme Court Approved Family Law Form 12.980(t), Petition for Injunction for Protection Against Stalking (03/15) that was not used in this case. Because there are additional, substantial questions please place a check on the blank line that are applicable and put a line through the sentence word or deed which is not applicable for this interrogatory:

4. a.)

Petitioner is a victim of stalking because Respondent has: *{please mark all sections that apply}*

- a. ____ Committed stalking;
- b. ____ Previously threatened, harassed, stalked, cyberstalked, or physically abused the Petitioner;
- c. ____ Threatened to harm Petitioner or family members or individuals closely associated with Petitioner;
- d. ____ Intentionally injured or killed a family pet;
- e. ____ Used, or threatened to use, against Petitioner any weapons such as guns or knives;
- f. ____ A criminal history involving violence or the threat or violence, if known;

10. This question is directly from the operative and current Florida Supreme Court Approved Family Law Form 12.980(t), Petition for Injunction for Protection Against Stalking (03/15) that was not used in this case, Because there are additional substantial competent questions please answer this question as directed into this interrogatory. This is question number 5 from that form. (If none of these happened just write not applicable):

Below is a description of the specific incidents of stalking or cyberstalking: {for cyberstalking, please include a description of all evidence of contacts and/or threats made by Respondent in voice messages, texts, emails, or other electronic communication} On {dates} _____

_____ the following incidents of stalking occurred at the following locations: {the locations may include, but need not be limited to, a home, school, or place of employment}

11. On July 27, 2015 after the injunction hearing did you receive the signed copy of the Final Order for the injunction before leaving the court? Yes or No _____

12. When did you receive the Final Order (date/time of receipt of order)?

13. How did you receive the final order (email, fax, USPS state what other method may have been used) and who sent it to you? _____

14. Please list the names of the person(s), the dates and times and the method you shared a copy of the final order of indefinite injunction with; including but not limited to Mike Kern, Tony Klein, Gary Crowe, Ronald Ezell, Greg Kellerman, Gina Sharbowski, Larry Roth, Lance Randall, Larry Yellon.

15. In your publication on the napps.org web page you penned an article accessed August 22, 2015 titled "Observations from a Founding Member". You wrote the following pertaining to respondent :**"He claims to want transparency, yet he blocks some people from access to his emails and his Facebook site if they disagree with him...."** Please describe who "some people" referred to in your words that are "blocked":

16. **“I believe most would agree that, given his current financial status, he should be trying to earn a living and not spending day and night writing libelous posts on websites and sending emails.”** ...Please describe the audience you reference in the phrase “most would agree”

17. **“Scott is clearly obsessed with trying to discredit NAPPS, its members and the past and present leadership. His efforts will undoubtedly fail.** Please describe what your thoughts are by “undoubtedly fail”.

18. Please state the name of any indemnity agreements or advances made or promises to pay from any entity, institution, corporation or another person for any costs associated with the actions of this domestic violence case including but not limited to all costs investigative or otherwise leading up to this charge.

19. Have you or your alliances through NAPPS ever hired a private investigator to follow, surveil respondent and/or gather data about respondent? Please include dates.

20. Have you ever petitioned any of the three branches of government on matters involving process serving? Briefly describe the last efforts what the purposes were and whether there was any opposition to your position.

21. Are you familiar with Robert Levy and associates a Florida Association of Professional Process Server Lobbyist? _____

22. Have you ever applied for or received an injunction against anyone? Please describe the name of the party and the location of the court.

23. Have you ever caused a cease and desist letter to be issued regarding activity of someone saying something that offended you? Please list the name of the recipient, the location of the recipient, the brief contexts of the letter and the year of the event.

24. As President of the National Association of Professional Process Servers in the late 1980's you appointed a Juanita Tanzer to chair a committee that developed a NAPPS code of ethics that forbade members from speaking words that disparage or impugn other members. Please briefly describe the reasons and the environment that brought about that provision of NAPPS code of ethic.

25. In January 2014 the Federal Trade Commission charged the NAPPS affiliate California Association of Professional Process Servers to remove its code of ethics. The FTC stated in the submitted consent order that any non profit trade association that forbids it members from competing in comparison speech that may impugn its competitors is anticompetitive. Do you know how many NAPPS members have been expelled from the NAPPS organization because of speech related activity about other trade members?

I have read the foregoing Answers to Interrogatories and do swear that they are true and correct of the best of my knowledge and belief.

Frederic A Blum,

By: _____

Sworn to and subscribed before me at _____ this _____ day
of _____ 2015.

Who is personally known to me

Who produced Drivers License
