

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT,
IN AND FOR POLK COUNTY, FLORIDA

CASE NO: 2026 CA-002394

THE FOREST AT RIDGEWOOD
HOMEOWNERS' ASSOCIATION, INC.,
a Florida not-for-profit Corporation

Plaintiff,

v.

LARRY BASSETT, individually and in his former
Capacity as Director,

Defendant

DEFENDANT'S INITIAL DISCOVERY DISCLOSURES

COMES NOW, Defendant, LARRY BASSETT, based upon information now known and reasonably available to the undersigned, makes the following Initial Disclosures to Plaintiff, THE FOREST AT RIDGEWOOD HOMEOWNERS ASSOCIATION, INC., there has not been a Case Management Order signed by the Court and there has not been any collaboration by the parties to formulate an Order to be submitted to the Court. Notwithstanding the above the Defendant LARRY BASSETT states as follows:

1. Identity of Persons who may possess discoverable information.

In addition to the general members Directors of the Plaintiff or former members Directors of the Plaintiff or alleged members Directors of the Plaintiff. The Defendant believes that the following individuals and entities are likely to have discoverable information which it may use to support its defenses in this case. The Defendant, however, reserves the right to supplement and or amend his response as additional information is obtained and discovery proceeds.

A. David Walker

Address Affiliation: 225 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; events, transactions, and communications at issue in this litigation; Defendant's conduct and defenses therein.

B. Robert Tobey

Address/Affiliation: 254 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant events, communications, and transactions at issue.

C. Tim Najour

Address/Affiliation: 316 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant events, communications, and transactions at issue.

D. Jennifer Engler

Address/Affiliation: Orlando Law Group, PL., 12301 Lake Underhill Rd, Ste 213, Orlando, FL 32828

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant communications, events, and transactions at issue.

E. Ed Burdon

Address/Affiliation: 1122 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant events, communications, and transactions at issue.

F. Ron Lapinski

Address/Affiliation: 215 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant events, communications, and transactions at issue.

G. David White

Address/Affiliation: 317 Golf Course Parkway, Davenport, FL 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint; relevant events, communications, and transactions at issue.

11. Kevin Mack

Address/Affiliation: 1011 Golf Course Parkway, Davenport, HI 33837

Subject Matter: Facts and circumstances relating to the allegations in the Complaint, relevant events, communications, and transactions at issue.

1. Carrie Maesuga, Oscher Consulting

Address/Affiliation: Oscher Consulting

2. Documents and Records, electronically stored information which may be used to support its defenses in this action are as follows:

1. Contracts, Agreements, Amendments, Invoices and Payments made between Jedi Management and The Forest at Ridgewood Homeowners Association, Inc: All contracts, agreements, amendments, addenda, and related correspondence between the parties since 1-1-2024

2. Contracts, Agreements, Amendments, Invoices and Payments made between Oscher Consulting and The Forest at Ridgewood Homeowners Association, Inc: Including all contracts, agreements, amendments, addenda, materials provided to them to be audited and that was used to create the Oscher report for the community, including any third party payments, requests, documentation, instructions, etc between any third parties that are related to the ordering of and the creation of the report that was created for this community since 1-1-2024

3. Financial Records and Statements: Financial records, ledgers, bank statements that hold or have held monies of this community since 1-1-2024 including any accounts held at a CHASE Bank, Invoices, receipts, billing records, and accountings between this HOA and relevant to the subject matter of this litigation

3. Communications -- Written and Electronic: All emails, text messages, letters, memoranda, written communications, and electronic communications between or among the parties, witnesses, or third parties relating to the claims and defenses in this action.

4. Corporate and Business Records: Organizational documents, resolutions, minutes of meetings, ownership records, board member vote records and operating records relevant to this litigation.
5. Reports and Analyses: Any reports, assessments, valuations, appraisals, or analyses -- including those prepared by or on behalf of any consulting firm (including but not limited to Oscher Consulting).
6. Photographs, Videos, and Recordings: Any photographs, video recordings, audio recordings, or surveillance footage relating to the events, properties, or individuals at issue in this litigation. Since 1/2024.
7. Management and Operational Records: Records relating to management, operations, or activities of any entity (including but not limited to Jedi Management) relevant to the claims and defenses in this litigation.
9. Legal Notices and Correspondence: Any demand letters, legal notices, notices of default, or pre-litigation correspondence relevant to the claims and defenses in this action.
10. Documents Relating to Damages: Any documents, calculations, or records relating to actual, consequential, or punitive damages alleged by any party in this action.
11. Third-Party Documents: Documents received from or sent to third parties (including subpoenas, public records, or voluntarily produced materials) relating to the subject matter of this litigation.
13. Any and All Other Documents: Any additional documents, records, or tangible items identified through the course of ongoing discovery that Defendant may use to support its defenses.
14. Any and All Other Documents: Regarding the request of the service, and all of the documents provided to Oscher Consulting to be analyzed and used as the basis to create a report from, and a copy of the final report and findings since 1/2024.

Dated: August 19, 2026 _____

By: S. James L. Rouse, Sr. _____
James L. Rouse, Sr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this document was electronically served via the Florida Court's E-Filing Portal on August 19, 2026, to the Forest at Ridgewood Homeowners' Association, Inc. Plaintiff, and Emailed to _____ and _____ attorneys for Plaintiff.

By: S. James L. Rouse, Sr.
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