

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 19-CV-81189-RKA

JAMES TRACY,

Plaintiff,

vs.

RICKEY LEON BETHEL, JR., AMY  
GRANDE, TRACY CLARK HAYNIE and  
GIA SHAW,

Defendants.

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**DEFENDANTS' INITIAL RULE 26 DISCLOSURES**

COME NOW, Defendants, RICKEY LEON BETHEL, JR., ANY GRANDE, TRACY CLARK HAYNIE and GIA SHAW, by and through their undersigned counsel, and pursuant to Rule 26(a)(1) Fed.R.Civ.P., hereby submits this Initial Rule 26 Disclosures.

**GENERAL STATEMENT**

Defendants do not intend to disclose information that is privileged or is otherwise immune from discovery. Disclosure of any information protected by the attorney-client privilege, work product doctrine or any other applicable privilege, except pursuant to a specific written agreement covering such information, shall be deemed inadvertent. Inadvertent disclosure of any such information shall not constitute a waiver or prejudice of any privilege or any other ground for objecting to discovery with respect to any such information nor shall such inadvertent disclosure waiver or prejudice the rights of the Defendants to object to the use of any such information during this or any subsequent proceeding.

The information provided herein is based upon the best information available to Defendants as of this date as Plaintiff has not produced discovery and discovery has not commenced in Federal Court. Defendants reserve the right to modify, amend and/or supplement this disclosure. Defendants' disclosure shall not constitute an admission by them that the information is properly discoverable or admissible at trial, and shall not constitute a waiver of any objection which might otherwise be made to disclosure of such information.

Defendants will produce existing responsive, non-privileged documents, to the extent such documents exist that have not already been produced and are in Defendants' possession, custody and control, at the office of Defendants' undersigned counsel at 300 Southeast Thirteenth Street, Fort Lauderdale, Florida 33316, at a date and time mutually convenient to the parties' respective counsel as requested in writing.

Subject to the foregoing, however, Defendants make the following disclosures:

- I. The following individuals are known to Defendants to be likely to have discoverable information relevant to the disputed facts:
  1. Rickey Leon Bethel, Jr., Defendant
  2. Amy Grande, Defendant
  3. Tracy Clark Haynie, Defendant
  4. Gia Shaw, Defendant
  5. Chief Sean Brammer, c/o Florida Atlantic University
  6. James Tracy, Plaintiff,
- II. Description by category of documents, data or tangible things relevant to disputed facts:
  1. Plaintiff's Second Amended Complaint
  2. Plaintiff's Notice of Proposed Termination

3. Plaintiff's Termination Notice
- III. No damages are asserted to date by Defendants.
  - IV. No insurance agreements pertain to this action.

Respectfully submitted,

WHITELOCK & ASSOCIATES, P.A.  
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s/Christopher J. Whitelock

Christopher J. Whitelock, Esq.  
Florida Bar Number: 0067539  
David Frank, Esq.  
Florida Bar Number: 93906

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on October 23, 2019, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission or Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Filing.

s/Christopher J. Whitelock

CHRISTOPHER J. WHITELOCK

**SERVICE LIST**

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