

**IN THE CIRCUIT COURT OF THE TWELTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA  
CIVIL DIVISION**

Michael T. Flynn,  
Plaintiff,

v.

Case No.: 2023 CA 004264 NC

Jim Stewartson,  
Rick Wilson  
Defendants.

\_\_\_\_\_ /

**NOTICE OF FILING**  
**CERTIFICATE OF NON-APPEARANCE**

Defendant, JIM STEWARTSON, by and through the undersigned counsel, hereby gives notice of the filing of the Certificate of Non-Appearance confirming the Plaintiff's failure to appear at a duly scheduled and noticed deposition duces tecum scheduled on April 28, 2025, at 9:30 a.m. The Certificate of Non-Attendance is attached hereto as Exhibit A.

Dated: April 30, 2025

\_\_\_\_\_  
George K. Rahdert, Esquire  
FBN 213365

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and proper copy of the foregoing document was served upon Jared Roberts, Esquire ([jared@binnal.com](mailto:jared@binnal.com)); Craig A. Whisenhunt, Esquire ([craig@grwrlawfirm.com](mailto:craig@grwrlawfirm.com) and [efiling@rightingwrongsflorida.com](mailto:efiling@rightingwrongsflorida.com)); Jonathan R. Huffman, Esquire ([jrh@boatmanricci.com](mailto:jrh@boatmanricci.com) and [courtfilings@boatnannanricci.com](mailto:courtfilings@boatnannanricci.com)); and Leonard M. Collins, Esquire ([leonard.collins@gray-robinson.com](mailto:leonard.collins@gray-robinson.com)) via the Florida E-Filing Portal on this 30<sup>th</sup> day of April, 2025.

***/s/ George K. Rahdert***

George K. Rahdert, Esquire  
FBN 213365

George A.D. Thurlow, Esquire  
FBN 1019960

Rahdert & Mortimer, PLLC

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Notice of Filing CNA – Flynn Non-Appearance  
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Attorneys for Defendant, STEWARTSON

April 28, 2025

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY  
CIVIL DIVISION

CASE NO.: 2023 CA 004262 NC

MICHAEL T. FLYNN,  
Plaintiff,

vs.

JIM STEWARTSON,  
RICK WILSON,

Defendants.

CERTIFICATE OF NONAPPEARANCE

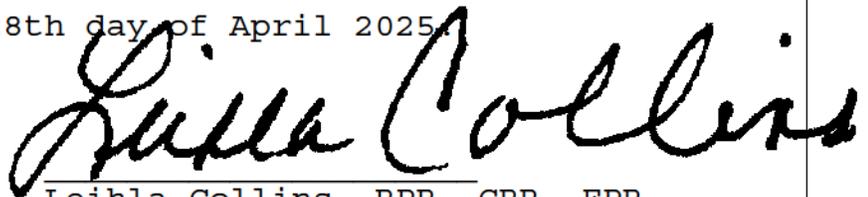
In re: Deposition of Michael T. Flynn

STATE OF FLORIDA )  
COUNTY OF SARASOTA )

I, Leihla Collins, RPR, CRR, FPR, do hereby certify that I appeared at U.S. Legal Support, 401 North Cattlemen Road, Suite 104, Sarasota, Florida, on Monday, April 28, 2025, at 9:30 a.m. for the purpose of reporting the deposition of Michael T. Flynn and that the witness did not appear for the scheduled deposition by 10:00 a.m. Also present was George A.D. Thurlow, Esquire.

Under penalties of perjury, I declare that I have read the foregoing certificate, and that the facts stated in it are true.

DATED THIS 28th day of April 2025.



Leihla Collins, RPR, CRR, FPR  
U.S. Legal Support, Inc.  
401 N. Cattlemen Road, Suite 104  
Sarasota, Florida 34232  
(941)954-0020

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA  
CIVIL DIVISION**

**MICHAEL T. FLYNN,**

Plaintiff,

**v.**

**JIM STEWARTSON, et al.,**

Defendants.

Case No.: 2023 CA 004264 NC

Division C Circuit

**NOTICE OF MEDIATION ATTENDANCE AND  
CERTIFICATION OF AUTHORITY**

Plaintiff, Michael T. Flynn, by and through undersigned counsel, and pursuant to Fla. R. C. P. Rule 1.720(e), hereby notifies the Court and the parties of mediation with Defendant, Rick Wilson, and that the following individual(s) will be attending mediation and certifies such person(s) will have full authority to settle without further consultation as required by Fla. R. C. P. Rule 1.720(b):

**Name:** Lori Flynn

**Address:** c/o Binnall Law Group, PLLC, 717 King Street, Suite 200,  
Alexandria, Virginia, 22314

**Relationship to Party:** Wife of Plaintiff.

Dated: April 30, 2025

Respectfully submitted,

/s/ Jared Roberts

Jared J. Roberts

(Fl. Bar No. 1036550)

Stephen B. French

(Fl. Bar No. 0078761)

BINNALL LAW GROUP, PLLC

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*Counsel for Michael T. Flynn*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2025, I have caused a true and accurate copy of the foregoing to be delivered to counsel of record via e-filing.

/s/ Jared Roberts

Jared J. Roberts  
(Fl. Bar No. 1036550)

*Counsel for Michael T. Flynn*