

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

CITY OF PALM COAST, a Florida
governmental entity,

Plaintiff,

CASE NO: 2022-CA-000773

vs.

BBI CONSTRUCTION MANAGEMENT, INC.,
a Florida profit corporation; NO FAULT LLC, a
foreign limited liability company; S&ME, INC.,
a foreign profit corporation; WESTFIELD
INSURANCE COMPANY, a foreign profit
company, VORTEX AQUATIC
CORPORATION, a foreign profit corporation;
and AQUATIC CONSULTING ENGINEERS,
INC., a Florida profit corporation,

Defendants.

_____ /

BBI CONSTRUCTION MANAGEMENT, INC.,
a Florida corporation

Third-Party Plaintiff,

vs.

4C's TRUCKING & EXCAVATION, INC., a
Florida profit corporation; COST OF
WISCONSIN, INC., a Florida profit
corporation; KDK CONCRETE OF VOLUSIA,
INC., a Florida profit corporation; REP
SERVICES, INC., a Florida profit corporation;
TURNSOLE BUILDERS, LLC, a Florida
limited liability company; WELLER POOLS,
LLC, a Florida limited liability company,

Third-Party Defendants

_____ /

NO FAULT LLC

Third-Party Plaintiff,

vs.

A&W SAFETY SURFACING, LLC d/b/a
PLAYSAFE SURFACING, LLC; and
AMERICAN RECYCLING CENTER INC,

Third-Party Defendants.

PLAINTIFF, CITY OF PALM COAST'S, INITIAL FACT WITNESS DISCLOSURE

Plaintiff, City of Palm Coast (the "City"), by and through undersigned counsel,
hereby discloses its initial fact witnesses who may testify at trial and states as follows:

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**33. Corporate Representative of Western Aquatic Construction and
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34. Any and all witnesses disclosed by any other party in this matter.

35. Any and all persons who have or will be deposed in this action.

36. Impeachment and rebuttal witnesses.

Plaintiff reserves the right to revise, amend, and supplement this Initial Fact Witness Disclosure as discovery is not yet completed.

DATED this 8th day of November, 2024.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, on this 8th day of November, 2024, that a true copy of the foregoing has been filed with Florida's eFiling Portal, which will deliver a service copy via electronic mail to counsel of record.

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