

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

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**MOTION TO STRIKE ORDER TO SHOW CAUSE**

**EXHIBITS – PART 4**

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Plaintiff's Emergency Motion to Strike Strange  
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Entered 3/24/2021. [Page 907.]

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member of the Florida Bar 3/25/2021. [Page 909.]

APPENDIX 54 – Page 11 of the BAR MOTION marked to show where  
the signature is supposed to be. [Page 912.]

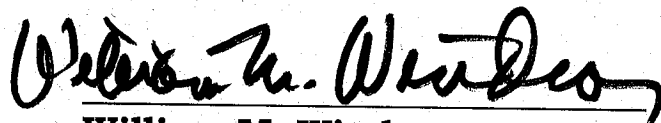
APPENDIX 55 – Recent filing by Assistant State Attorney David Asti  
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APPENDIX 56 – Spreadsheet showing the 172 people denied the  
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APPENDIX 57 – Spreadsheet showing the nineteen (19) Florida  
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of the Florida Bar. [Page 932.]

PLEASE NOTE: Large exhibits can be accessed on the Orange  
County Clerk website.

Submitted this 27th day of March, 2021.



**William M. Windsor**

100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988

windsorinmontana@yahoo.com  
billwindsor1@outlook.com

# Appendix

# 31

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN  
AND FOR ORANGE COUNTY, FLORIDA

CASE NO.: 2018-CA-010270-O

DIVISION 37

WILLIAM WINDSOR

PLAINTIFF(S)

v.

ROBERT KEITH LONGEST; BOISE CASCADE  
BUILDING MATERIALS DISTRIBUTION LLC

DEFENDANT *et al.*

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**MOTION FOR RECONSIDERATION OF PLAINTIFF'S EMERGENCY MOTION TO  
STRIKE DEFENDANTS ROBERT KEITH LONGEST AND BOISE CASCADE  
BUILDINGS MATERIALS DISTRIBUTION L.L.C. EMERGENCY MOTION TO  
REQUIRE PRO SE PLAINTIFF WILLIAMS WINDSOR'S SUBMISSIONS TO THE  
COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE  
FLORIDA BAR AND MEMORANDUM OF LAW**

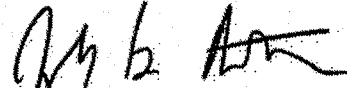
THIS CAUSE coming before the Court on Plaintiff's Motion for Reconsideration of Plaintiff's Emergency Motion to Strike Defendants Robert Keith Longest and Boise Cascade Buildings Materials Distribution L.L.C. Emergency Motion to Require Pro Se Plaintiff Williams Windsor's Submissions to the Court Be Reviewed, Approved and Signed by a Member of The Florida Bar and Memorandum of Law, filed February 26, 2021 and the Court, being fully advised in the premises, does hereby

**ORDER AND ADJUDGE:**

1. The Plaintiff's Motion for Reconsideration of Plaintiff's Emergency Motion to Strike Defendants Robert Keith Longest and Boise Cascade Buildings Materials Distribution L.L.C. Emergency Motion to Require Pro Se Plaintiff Williams Windsor's Submissions to the

Court Be Reviewed, Approved and Signed by a Member of The Florida Bar and Memorandum  
of Law is Denied.

**DONE AND ORDERED** at Orlando, Orange County, Florida, this 2<sup>nd</sup> day of March,  
2021.



eSigned by Jeffrey Ashton 03/02/2021 14:32:29 +WDad+0

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**JEFFREY L. ASHTON**  
Circuit Judge

Copies furnished to:

A copy of the foregoing has been electronically filed with the Clerk of Courts by using the Florida  
Court E-Filing Portal.

# Appendix

## 32

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**AMENDED MOTION FOR 16-HOUR HEARING**

COMES NOW William M. Windsor (“Windsor” or “Plaintiff”), and files this Amended Motion for 16-hour Hearing and shows the Court as follows:

1. This Court has scheduled a one-hour hearing for April 6, 2021.
2. Windsor somehow did not receive the Order to Show Cause dated 3/2/2021 until a few minutes ago. He has been ordered to appear and show cause why the Court should not grant the relief requested in Defendant’s motion to require Plaintiff’s submissions and/or pleadings to the Court be reviewed, approved, and signed by a member of the Florida Bar.
3. It will take Windsor 16 hours to present his evidence. He has also requested Subpoenas from the Clerk of the Court.
4. If Windsor loses the motion, he will lose this case and the anticipated \$3,500,000 jury award.
5. Upon information and belief, this seems to be the intent of Jeffrey L. Ashton, an attorney who appears to have a special arrangement with the attorneys for the DEFENDANTS.

6. Windsor has requested 16 hours to be able to present the evidence necessary to prove the motion is a sham, frivolous pleading and to have a record sufficient to show appellate courts that any ruling against Windsor will be due to what Windsor believes is the blatant dishonesty of Judge Jeffrey L. Ashton.

7. Windsor also requests an honest judge to handle the hearing.

**PRAYER FOR RELIEF**

8. Wherefore, Windsor moves the Court to schedule 16 hours for the hearing; issue an order to show cause; schedule an honest judge (not Jeffrey L. Ashton) to hear the matter; and grant such other and further relief as is deemed just and proper.

This 10th day of March, 2021.



William M. Windsor

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

This 10th day of March, 2021,



William M. Windsor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 10th day of March, 2021.



William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
billwindsor1@outlook.com  
bill@billwindsor.com



# Appendix

# 33

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

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## SUBPOENA DUCES TECUM FOR DEPOSITION

THE STATE OF FLORIDA:

**TO: David Wynne**

YOU ARE COMMANDED to appear before a person authorized by law to take  
depositions via ZOOM.

The deposition will be held on March 31, 2021 at 8:00 a.m. You will be testifying in this  
action, and you are to have with you at that time and place the documents on Exhibit A hereto.

You are subpoenaed to appear by William M. Windsor, and unless excused from this  
subpoena by William M. Windsor or the court, you must respond to this subpoena as directed.

Tiffany Moore Russell

DATE: March 16, 2021

/s/ Sandra Jackson



DEPUTY CLERK

425 North Orange Ave.  
Suite 350  
Orlando, Florida 32801

Party: William M. Windsor  
Address: 100 East Oak Terrace Drive, Unit B3, Leesburg, Florida 34748  
Phone: 352-805-7887 -- Email: billwindsor1@outlook.com

Any minor subpoenaed for testimony has the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of section 90.616, Florida Statutes, except on a showing that the presence of a parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact [identify applicable court personnel by name, address, and telephone number] at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.


**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

David Wynne  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 11th day of March, 2021.



William M. Windsor

# EXHIBIT

# A

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-0

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

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**PLAINTIFF'S NOTICE OF TAKING ORAL DEPOSITION OF**  
**DAVID WYNNE**

PLEASE TAKE NOTICE that the Plaintiff, WILLIAM M. WINDSOR, will take the  
ZOOM deposition of:

**NAME:** David Wynne

**DATE AND TIME:** March 31, 2021 8:00 a.m.

**LOCATION:** ZOOM, so wherever the named person can access a computer with a  
microphone and camera.

This will be an oral examination before an officer duly authorized by law to take  
depositions. The deposition is being taken for purposes of discovery, or use at a hearing or trial,  
or for such other purpose as is permitted under the applicable and governing Florida Rules of  
Civil Procedure.

A subpoena duces tecum will be served on David Wynne. The materials to be produced  
are to be produced the day before the deposition to William M. Windsor, 100 East Oak Terrace  
Drive, Unit B3, Leesburg, Florida 34748 or bill@billwindsor.com. David Wynne must produce

each separate item requested for production in a file folder marked to show the date requested and the item number of the request. David Wynne must comply with Florida Rules of Civil Procedure Rule 1.280 (B) (6) if making a claim of privilege; any such claim must describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.

The materials to be produced under the subpoena are:

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to William M. Windsor ("WINDSOR").
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication from WINDSOR.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Russell E. Klemm, Christine Praria, anyone with Clayton & McCulloh, Maura Krause, anyone with Goldberg Segalla, Christina Bredahl Gierke, or anyone with Cole, Scott & Kissane.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication or information about WINDSOR.
5. All documents relating or referring to, or evidencing, reflecting, or constituting information about your residence address.
6. All documents relating or referring to, or evidencing, reflecting, or constituting information about your cell phone number(s).
7. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR between the hours of midnight and 6 am.

8. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions."
9. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions" when WINDSOR did not thereafter seek sanctions.
10. All documents relating or referring to, or evidencing, reflecting, or constituting anything relative to your college and law school education.
11. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that were not filed in response to filings by the DEFENDANTS or necessitated by filings by the DEFENDANTS.
12. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Civil Procedure.
13. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Professional Conduct.
14. All documents relating or referring to, or evidencing, reflecting, or constituting statutes or rules that prohibit a party from making claims about a party or an attorney under oath under penalty of perjury.
15. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that disparaged the judicial system.
16. All documents relating or referring to, or evidencing, reflecting, or constituting case law to support that the following, if true, is grounds to require WINDSOR to have his pleadings signed by a member of the Florida BAR:

"During the past eleven (11) months, Mr. Windsor has sent voluminous emails and filed numerous pleadings and associated documents, which number well in excess of 2,500

pages. Many of these emails and pleadings are filed after business hours, between the hours of midnight and 6 a.m., and on the weekends. The majority of the emails and pleadings filed by Mr. Windsor are harassing in nature, have no legal merit, have already been ruled on several times, question our clients character as well as the attorneys of records David Wynne and Scott Astrin, and disparage the presiding Judge and the judicial system. In addition, the majority of Mr. Windsor's emails end with the ongoing threat "I will file a Motion for Sanctions" if he does not get his way. As set forth above, Mr. Windsor began representing himself in March 2020. In the past eleven (11) months, Mr. Windsor has spent his time filing at best fifty motions and pleadings attaching voluminous documents, sometimes over a 1000 pages. A majority of the Motions are repetitive seeking reconsideration. The Court has denied these same Motions several times. In addition, Mr. Windsor has filed Motions to Recuse the presiding Judge three (3) times to include your Honor. Furthermore, he has a pending action in the 5<sup>th</sup> DCA wherein he has filed a Writ of Prohibition seeking your Honor's recusal and additional affirmative relief. The first Writ of Prohibition was summarily denied without hearing. Despite the denials of his Motions, Mr. Windsor continues to inundate the court and litigants with voluminous filings. This includes at least 10 filings over the past week."

17. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive.

18. All documents relating or referring to, or evidencing, reflecting, or constituting proof of meeting and conferring prior to filings by the DEFENDANTS in this Case.

19. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by a DEFENDANT in this Case.

20. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by an attorney in this Case.

21. All documents relating or referring to, or evidencing, reflecting, or constituting verifications of motions and pleadings filed by an attorney in this Case.

22. All documents relating or referring to, or evidencing, reflecting, or constituting orders in this case to indicate WINDSOR has done anything improper in this Case.



23. All documents relating or referring to, or evidencing, reflecting, or constituting motions in this Case to disqualify that were not supported by Florida Statutes, the Rules, or the Constitutions of Florida and the United States of America.
24. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive and not allowed under the Florida Rules of Civil Procedure.
25. All documents relating or referring to, or evidencing, reflecting, or constituting the Billing Records applicable to this Case.
26. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not supported by legal authority.
27. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not responses to the DEFENDANTS, motions for continuance or stay, motions for hearings or conferences.
28. All documents relating or referring to, or evidencing, reflecting, or constituting DEFENDANTS' Motions in this Case that did not identify a specific statute or rule as legal authority.
29. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made against Scott L. Astrin, David Wynne, and/or the Law Office of Scott L. Astrin.
30. All documents relating or referring to, or evidencing, reflecting, or constituting a counterclaim filed by a DEFENDANT in this Case.
31. All documents relating or referring to, or evidencing, reflecting, or constituting communication with anyone regarding an Order to Show Cause in this Case.

32. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Georgia.

33. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Montana.

34. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Texas.

35. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Florida.

### **I. Definitions**

As used in this Request for Production of Documents ("REQUEST"), the following terms mean:

(a) "You" or "your" -- The person(s) to whom this REQUEST is addressed and all other persons acting or purporting to act on said person's behalf.

(b) "Document" -- Includes, without limitation, writings, emails (whether printed or not), agreements, contracts, and printed matter of every kind and description; data stored on a computer hard disk or other memory card, photographs and drawings; notes and records of any oral communications; e-mails and recordings (tape, disc or other) of oral communications.

(c) "Person" or "persons" -- Any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or any other entity.

(d) "Communicate" or "communication" -- Includes every manner or means of disclosure, transfer, or exchange and every disclosure, transfer or exchange of information whether orally or by documents or whether face-to-face or by telephone, mail, personal delivery or otherwise.

(e) "Or" -- Shall be construed either conjunctively or disjunctively to bring within the scope of this REQUEST any information which might otherwise be construed to be outside their scope.

(f) "Complaint" -- The Complaint filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(g) "Case" -- The Case filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(h) "Windsor" -- a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.


(i) "Plaintiff" -- William M. Windsor, a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(j) "Defendants" -- ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., a Foreign Limited Liability Company

(k) "WYNNE" or "DAVID WYNNE" is an employee of Law Offices Scott L. Asstrin.

(l) "ASTRIN" or "SCOTT ASTRIN" or "SCOTT L. ASSTRIN" is an employee of Law Offices Scott L. Asstrin.

Dated in Leesburg, Florida this 11th day of March, 2021.

  
William M. Windsor  
Pro Se

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

David Wynne  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.asstrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 11th day of March, 2021.



William M. Windsor

# Appendix

# 34

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

## SUBPOENA DUCES TECUM FOR DEPOSITION

THE STATE OF FLORIDA:

**TO: Scott L. Astrin**

YOU ARE COMMANDED to appear before a person authorized by law to take  
depositions via ZOOM.

The deposition will be held on March 29, 2021 at 8:00 a.m. You will be testifying in this  
action, and you are to have with you at that time and place the documents on Exhibit A hereto.

You are subpoenaed to appear by William M. Windsor, and unless excused from this  
subpoena by William M. Windsor or the court, you must respond to this subpoena as directed.

Tiffany Moore Russell

DATE: March 16, 2021

/s/ Sandra Jackson



DEPUTY CLERK

**425 North Orange Ave.  
Suite 350  
Orlando, Florida 32801**

Party: William M. Windsor  
Address: 100 East Oak Terrace Drive, Unit B3, Leesburg, Florida 34748  
Phone: 352-805-7887 -- Email: billwindsor1@outlook.com

Any minor subpoenaed for testimony has the right to be accompanied by a parent or guardian at all times during the taking of testimony notwithstanding the invocation of the rule of sequestration of section 90.616, Florida Statutes, except on a showing that the presence of a parent or guardian is likely to have a material, negative impact on the credibility or accuracy of the minor's testimony, or that the interests of the parent or guardian are in actual or potential conflict with the interests of the minor.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact [identify applicable court personnel by name, address, and telephone number] at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

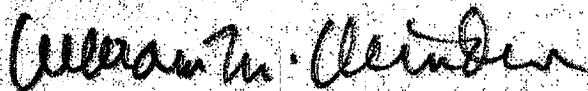
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

Scott L. Asstrin  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.asstrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 11th day of March, 2021.



William M. Windsor

# EXHIBIT

# A



IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S NOTICE OF TAKING ORAL DEPOSITION OF**  
**SCOTT L. ASTRIN**

PLEASE TAKE NOTICE that the Plaintiff, WILLIAM M. WINDSOR, will take the  
ZOOM deposition of:

**NAME:** Scott L. Astrin

**DATE AND TIME:** March 29, 2021 8:00 a.m.

**LOCATION:** ZOOM, so wherever the named person can access a computer with a  
microphone and camera.

This will be an oral examination before an officer duly authorized by law to take  
depositions. The deposition is being taken for purposes of discovery, or use at a hearing or trial,  
or for such other purpose as is permitted under the applicable and governing Florida Rules of  
Civil Procedure.

A subpoena duces tecum will be served on Scott L. Astrin. The materials to be produced  
are to be produced the day before the deposition to William M. Windsor, 100 East Oak Terrace  
Drive, Unit B3, Leesburg, Florida 34748 or bill@billwindsor.com. Scott L. Astrin must produce

each separate item requested for production in a file folder marked to show the date requested and the item number of the request. Scott L. Astrin must comply with Florida Rules of Civil Procedure Rule 1.280 (B) (6) if making a claim of privilege; any such claim must describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.

The materials to be produced under the subpoena are:

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to William M. Windsor ("WINDSOR").
2. All documents relating or referring to, or evidencing, reflecting, or constituting communication from WINDSOR.
3. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Russell E. Klemm, Christine Praria, anyone with Clayton & McCulloh, Maura Krause, anyone with Goldberg Segalla, Christina Bredahl Gierke, or anyone with Cole, Scott & Kissane.
4. All documents relating or referring to, or evidencing, reflecting, or constituting communication or information about WINDSOR.
5. All documents relating or referring to, or evidencing, reflecting, or constituting information about your residence address.
6. All documents relating or referring to, or evidencing, reflecting, or constituting information about your cell phone number(s).
7. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR between the hours of midnight and 6 am.

8. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions."

9. All documents relating or referring to, or evidencing, reflecting, or constituting emails from WINDSOR that said "I will file a Motion for Sanctions" when WINDSOR did not thereafter seek sanctions.

10. All documents relating or referring to, or evidencing, reflecting, or constituting anything relative to your college and law school education.

11. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that were not filed in response to filings by the DEFENDANTS or necessitated by filings by the DEFENDANTS.

12. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Civil Procedure.

13. All documents relating or referring to, or evidencing, reflecting, or constituting the Florida Rules of Professional Conduct.

14. All documents relating or referring to, or evidencing, reflecting, or constituting statutes or rules that prohibit a party from making claims about a party or an attorney under oath under penalty of perjury.

15. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that disparaged the judicial system.

16. All documents relating or referring to, or evidencing, reflecting, or constituting case law to support that the following, if true, is grounds to require WINDSOR to have his pleadings signed by a member of the Florida BAR:

"During the past eleven (11) months, Mr. Windsor has sent voluminous emails and filed numerous pleadings and associated documents, which number well in excess of 2,500

pages. Many of these emails and pleadings are filed after business hours, between the hours of midnight and 6 a.m., and on the weekends. The majority of the emails and pleadings filed by Mr. Windsor are harassing in nature, have no legal merit, have already been ruled on several times, question our clients character as well as the attorneys of records David Wynne and Scott Astrin, and disparage the presiding Judge and the judicial system. In addition, the majority of Mr. Windsor's emails end with the ongoing threat "I will file a Motion for Sanctions" if he does not get his way. As set forth above, Mr. Windsor began representing himself in March 2020. In the past eleven (11) months, Mr. Windsor has spent his time filing at best fifty motions and pleadings attaching voluminous documents, sometimes over a 1000 pages. A majority of the Motions are repetitive seeking reconsideration. The Court has denied these same Motions several times. In addition, Mr. Windsor has filed Motions to Recuse the presiding Judge three (3) times to include your Honor. Furthermore, he has a pending action in the 5<sup>m</sup> DCA wherein he has filed a Writ of Prohibition seeking your Honor's recusal and additional affirmative relief. The first Writ of Prohibition was summarily denied without hearing. Despite the denials of his Motions, Mr. Windsor continues to inundate the court and litigants with voluminous filings. This includes at least 10 filings over the past week."

17. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive.

18. All documents relating or referring to, or evidencing, reflecting, or constituting proof of meeting and conferring prior to filings by the DEFENDANTS in this Case.

19. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by a DEFENDANT in this Case.

20. All documents relating or referring to, or evidencing, reflecting, or constituting affidavits filed by an attorney in this Case.

21. All documents relating or referring to, or evidencing, reflecting, or constituting verifications of motions and pleadings filed by an attorney in this Case.

22. All documents relating or referring to, or evidencing, reflecting, or constituting orders in this case to indicate WINDSOR has done anything improper in this Case.

23. All documents relating or referring to, or evidencing, reflecting, or constituting motions in this Case to disqualify that were not supported by Florida Statutes, the Rules, or the Constitutions of Florida and the United States of America.

24. All documents relating or referring to, or evidencing, reflecting, or constituting documents filed in this case by WINDSOR that are repetitive and not allowed under the Florida Rules of Civil Procedure.

25. All documents relating or referring to, or evidencing, reflecting, or constituting the Billing Records applicable to this Case.

26. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not supported by legal authority.

27. All documents relating or referring to, or evidencing, reflecting, or constituting WINDSOR Motions in this Case that were not responses to the DEFENDANTS, motions for continuance or stay, motions for hearings or conferences.

28. All documents relating or referring to, or evidencing, reflecting, or constituting DEFENDANTS' Motions in this Case that did not identify a specific statute or rule as legal authority.

29. All documents relating or referring to, or evidencing, reflecting, or constituting complaints made against Scott L. Astrin, David Wynne, and/or the Law Office of Scott L. Astrin.

30. All documents relating or referring to, or evidencing, reflecting, or constituting a counterclaim filed by a DEFENDANT in this Case.

31. All documents relating or referring to, or evidencing, reflecting, or constituting communication with anyone regarding an Order to Show Cause in this Case.

32. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Georgia.

33. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Montana.

34. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Texas.

35. All documents relating or referring to, or evidencing, reflecting, or constituting your personal knowledge of WINDSOR'S litigation in Florida.

### **I. Definitions**

As used in this Request for Production of Documents ("REQUEST"), the following terms mean:

- (a) "You" or "your" -- The person(s) to whom this REQUEST is addressed and all other persons acting or purporting to act on said person's behalf.
- (b) "Document" -- Includes, without limitation, writings, emails (whether printed or not), agreements, contracts, and printed matter of every kind and description; data stored on a computer hard disk or other memory card, photographs and drawings; notes and records of any oral communications; e-mails and recordings (tape, disc or other) of oral communications.
- (c) "Person" or "persons" -- Any individual, corporation, partnership, joint venture, firm, association, proprietorship, agency, board, authority, commission or any other entity.
- (d) "Communicate" or "communication" -- Includes every manner or means of disclosure, transfer, or exchange and every disclosure, transfer or exchange of information, whether orally or by documents or whether face-to-face or by telephone, mail, personal delivery or otherwise.

(e) "Or" -- Shall be construed either conjunctively or disjunctively to bring within the scope of this REQUEST any information which might otherwise be construed to be outside their scope.

(f) "Complaint" -- The Complaint filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

(g) "Case" -- The Case filed in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida assigned Case No. 2018-CA-010270-O.

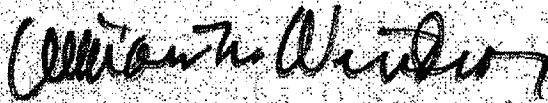
(h) "Windsor" -- a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(i) "Plaintiff" -- William M. Windsor, a resident of Lake County, Florida. He resides at 100 East Oak Terrace Drive Unit B3, Leesburg, Florida 34748, billwindsor1@outlook.com.

(j) "Defendants" -- ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., a Foreign Limited Liability Company

(k) "WYNNE" or "DAVID WYNNE" is an employee of Law Offices Scott L. Asstrin.

Dated in Leesburg, Florida this 11th day of March, 2021,



**William M. Windsor**  
Pro Se

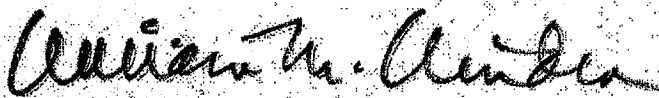
**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

Scott L. Asstrin  
Law Offices of Scott L. Asstrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.asstrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 11th day of March, 2021.



William M. Windsor



# Appendix

## 35

Docket Events

Document Status: = Public = VOR = Confidential = Sealed = Request Pending

Description	Pages	Doc	Request Doc
Motion or Motion to Strike Comments: STRANGE HIDDEN DOCKET ENTRY AND MEMORANDUM OF LAW (cc: e-03/12/2021)	3		
Docena Duces Tecum for Deposition issued to Comments: FEE NOT PAID	11		
Notice of Taking Deposition(s)	6		
Notice of Taking Deposition(s)	4		
Motion for Hearing Comments: amended - pro se sent to judge	3		
Motion for Hearing Comments: PRO SE- SENT TO JUDGE	3		
Motion Comments: TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW AND MOTION TO FIND PRO SE PLAINTIFF WILLIMA	52		
Order Denying Comments: motion for reconsideration of plaintiff's emergency motion	2		
Certified Copy Issued Comments: E-Mailed to Atty	2		

VOR / Viewable  
 Certain case documents  
 identifiable returns  
 before they are ve  
 listed in the Docket  
 documents that re  
 before they can be  
 request access to  
 1. Check the  
 document  
 for other  
 2. Once all  
 this case  
 screen an  
 enter or ca  
 request  
 3. You will re  
 confirm ye  
 notification  
 available  
 complete

For definitions of a  
 necessary

Hearings

# Appendix

# 36

## 2018-CA-010270-O: Strange Docket

William Michael Windsor <billwindsor1@outlook.com>

Fri 3/12/2021 12:34 AM

To: 37orange <37orange@ninthcircuit.org>

Cc: Wynne, David <David.Wynne@AIG.com>; Astrin, Scott <Scott.Astrin@AIG.com>; Christopher, Emily <Emily.Christopher@aig.com>; tampapleadings@aig.com <tampapleadings@aig.com>

Bcc: William Michael Windsor <billwindsor1@outlook.com>

On the Docket, the following appears:

---

3/3/2021 Motion

Comments: TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW AND MOTION TO FIND PRO SE PLAINTIFF WILLIMA

It is blocked from viewing.

How did this happen?

I have checked all of my emails, and I have no notice of such a filing.

Is this more fraud on the court?

**William Michael Windsor**  
billwindsor1@outlook.com

# Appendix

# 37

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S EMERGENCY MOTION TO STRIKE**  
**STRANGE HIDDEN DOCKET ENTRY AND MEMORANDUM OF LAW**

COMES NOW, William M. Windsor ("Windsor" or "Plaintiff"), and files Plaintiff's  
EMERGENCY Motion to Strike Strange Hidden Docket Entry and Memorandum of Law.  
Pursuant to the Florida Rules of Civil Procedure, the Florida Rules of Judicial Administration,  
the Florida Code of Judicial Conduct, the Florida Rules of Professional Conduct, and the  
Constitutions of the State of Florida and the United States of America, Windsor shows the Court  
as follows:

1. While preparing for the 16-hour hearing that is to begin on April 6, 2021,  
Windsor discovered a strange Docket entry on myorangeclerk.com:



2. This is allegedly 52 pages and it is blocked from viewing.

3. Windsor did not receive service of any such motion, and there was no meet and confer, which means it must be declared void and stricken.

4. This is the third item Windsor has discovered this week that he was never served.

**PRAYER FOR RELIEF**

Wherefore, the Plaintiff moves the Court for an order striking the 3/2/2021 Docket entry; denying the motion; investigating the manner in which this appeared on the Docket; sanctioning the DEFENDANTS' attorneys; and granting such other and further relief as is deemed just and proper.

Dated in Leesburg, Florida this 12th day of March, 2021,



William M. Windsor

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

David I. Wynne and Scott L. Asstrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 12th day of March, 2021.



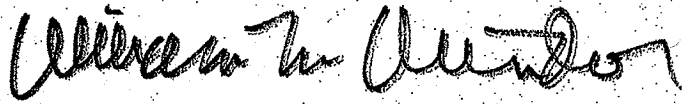
William M. Windsor

**VERIFICATION**

The facts alleged in the foregoing are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 12th day of March, 2021,

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style.

William M. Windsor



# Appendix

# 38

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S VERIFIED MOTION TO STRIKE ANSWER AND AMENDED  
ANSWER; ENTER A DECREE PRO CONFESSO; ENTER JUDGMENT IN FAVOR OF  
THE PLAINTIFF; AND SCHEDULE THE JURY TRIAL FOR DAMAGES**

COMES NOW, William M. Windsor ("Windsor" or "Plaintiff"), and files Plaintiff's Verified Motion to Strike Answer and Amended Answer; Enter a Decree Pro Confesso; enter Judgment in Favor of the Plaintiff; and Schedule the Jury Trial for Damages. Pursuant to the Florida Rules of Civil Procedure including Rules 1.140 and 1.500; Rules 2.515, 2.516, and 2.520 of the Florida Rules of Judicial Administration; and the Court's Inherent Powers. Windsor shows the Court as follows:

1. On October 10, 2018, the DEFENDANTS filed an Answer. It is unsigned.  
[EXHIBIT A.]
2. On November 9, 2020, the DEFENDANTS filed an Amended Answer. It is unsigned. [EXHIBIT B.]
3. A signature is not optional. The signature is much more than a person's name. Rule 2.515 of the Florida Rules of Judicial Administration dictates the requirement:

“Every document of a party represented by an attorney shall be signed by at least 1 attorney of record in that attorney’s individual name whose current record Florida Bar address, telephone number, including area code, primary e-mail address and secondary e-mail address, if any, and Florida Bar number shall be stated, and who shall be duly licensed to practice law in Florida or who shall have received permission to appear in the particular case as provided in rule 2.510. The attorney may be required by the court to give the address of, and to vouch for the attorney’s authority to represent, the party. Except when otherwise specifically provided by an applicable rule or statute, documents need not be verified or accompanied by affidavit. The signature of an attorney shall constitute a certificate by the attorney that:

- (1) the attorney has read the document;
- (2) to the best of the attorney’s knowledge, information, and belief, there is good ground to support the document;
- (3) the document is not interposed for delay; and
- (4) the document contains no confidential or sensitive information, or that any such confidential or sensitive information has been properly protected by complying with the provisions of rules 2.420 and 2.425. **If a document is not signed or is signed with intent to defeat the purpose of this rule, it may be stricken and the action may proceed as though the document had not been served.** [emphasis added.]

4. Therefore, there is no proof that an attorney read the Answers, and there is no certification that, to the best of anyone’s knowledge, information, and belief, there is good ground to support the Answers.

5. The attorneys for the DEFENDANTS have established that they know how to sign a pleading. EXHIBIT C contains several pleadings that were signed.

6. There are cases where pleadings were declared nullities because they were not properly signed. However, this is such a fundamental requirement that there aren’t a boatload of cases.

See *Wunderle v. Fruits, Nuts & Bananas, Inc.*, 715 So.2d 325, 23 Fla. L. Weekly D1721 (Fla.App. Dist.2 07/24/1998); *Motor Sport Engineering, Inc. v. Car Point, Inc.*, 611 So.2d 15, 18 Fla. L. Weekly D85 (Fla.App. Dist.3 12/22/1992); *Ball v. Jones*, 65 So.2d 3 (Fla. 05/08/1953); *Strickland v. Jewell*, 85 So. 670, 80 Fla. 221 (Fla. 07/10/1920).

See *Daytona Migi Corp. v. Daytona Automotive Fiberglass, Inc.*, 417 So.2d 272 (Fla. 5th DCA 1982) (holding a notice of appeal signed by a non-attorney corporate officer a nullity); *Quinn v. Housing Auth. of Orlando*, 385 So.2d 1167 (Fla. 5th DCA 1980) (reversing summary judgment in favor of corporate housing authority, holding its

complaint signed and filed by a non-attorney void); *Nicholson Supply Co. v. First Fed. Sav. & Loan Assoc.*, 184 So.2d 438 (Fla. 2nd DCA 1966) (affirming trial court's striking of plaintiff corporation's complaint holding the complaint a nullity where it was filed and signed by the corporation's non-attorney president).

7. But in this case, there is no signature at all.

"Rule 2.515 requires that a 'document' be signed by the attorney of record; however the rule does not define the term 'document.' Instead, the definition of the term 'document' is found in rule 2.520, which defines "documents" as 'pleadings, motions, petitions, memoranda, briefs, notices, exhibits, declarations, affidavits, orders, judgments, decrees, writs, opinions, and *any paper or writing submitted to a court.*'

"An attorney's signature on any document or paper served on another party establishes that the attorney has read the document and that, to the attorney's knowledge, there are good grounds to support it. *See Fla. R. Jud. Admin. 2.515(a)(1), (2).* Moreover, a signed certificate of service can have legal significance if questions arise about whether a document was timely served. *See, e.g., JPMorgan Chase Bank, Nat'l Ass'n v. Bigley*, 120 So.3d 1265, 1267 (Fla. 3d DCA 2013) (noting that a signed certificate of service "creates a rebuttable presumption" that the document was mailed on the date certified (quoting *Migliore v. Migliore*, 717 So.2d 1077, 1079 (Fla. 4th DCA 1998))). Further, **the importance of attorney signatures on documents is underscored by the fact that rule 2.515 contains a sanctions provision that permits unsigned documents to be stricken.** *See Fla. R. Jud. Admin. 2.515(a)(4).*" (*Valle v. Flory*, 2D16-2848 (Fla.App. Dist.2 08/15/2018).) [**emphasis added.**]

8. Rule 2.516 (f) of the Florida Rules of Judicial Administration requires a signed "Certificate of Service." This Certificate has important legal implications, and it is totally separate and distinct from the requirements of an attorney's signature. Nothing in the Florida Rules of Judicial Administration, the Florida Rules of Civil Procedure, or the Florida Statutes provides that a signature on a certificate of service does anything but provide an attorney certification of compliance with Rule 2.516.

9. This Court must strike the unsigned Answers.

10. An answer not signed by defendants, whose answer it purports to be, may be stricken from the files on motion, or it may be ignored, and a decree pro confesso entered against such defendants. (*Morrill v. Burg*, 86 So. 566, 80 Fla. 606 (Fla. 10/23/1920).)

11. Pursuant to Rule 1.500 of the Florida Rules of Civil Procedure, this Court should order that the DEFENDANTS' Answer and Amended Answer must be ignored and a decree pro confesso entered against the DEFENDANTS.

12. This Court should order that all facts in the Amended Complaint are deemed admitted.

13. As the prevailing party in this case, the Plaintiff is entitled to attorney's fees and costs. The Plaintiff incurred a \$410 filing fee, a \$30 service fee, and has spent approximately \$200 on paper, ink, and postage.

**PRAYER FOR RELIEF**

Wherefore, the Plaintiff applies to this Court for an order that the Defendants have defaulted; order that all facts in the Amended Complaint are deemed admitted; order that the Relief requested in the Prayer for Relief is granted; order that the order awarding attorney's fees to the attorneys for the DEFENDANTS is stricken; order that the Defendants pay fees and costs to the Plaintiff as the Court feels is appropriate; conduct a jury trial for damages; and grant such other and further relief as is deemed just and proper.

Dated in Leesburg, Florida this 12th day of March, 2021,



---

William M. Windsor

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

David I. Wynne and Scott L. Asstrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 12th day of March, 2021.



William M. Windsor

VERIFICATION

Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification and that the facts alleged in the foregoing are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, he believes them to be true.

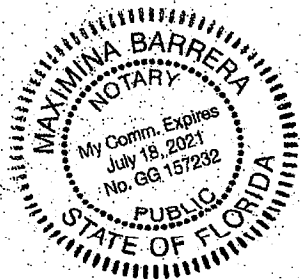
I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 12th day of March, 2021,



William M. Windsor

Sworn and subscribed before me this 12th day of March, 2021, by means of physical presence.

  
Notary Public

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S VERIFIED MOTION TO STRIKE ANSWER AND AMENDED  
ANSWER; ENTER A DECREE PRO CONFESSO; ENTER JUDGMENT IN FAVOR OF  
THE PLAINTIFF; AND SCHEDULE THE JURY TRIAL FOR DAMAGES**

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**EXHIBITS**



# EXHIBIT

# A

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IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual,  
and BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C., a  
Foreign Limited Liability Company,

Defendant.

**DEFENDANTS, ROBERT KEITH LONGEST AND BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C.'S, ANSWER TO PLAINTIFF'S ORIGINAL  
COMPLAINT**

COME NOW the Defendants, **ROBERT KEITH LONGEST AND BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**, by and through their undersigned attorneys, and hereby file their answer to Plaintiff's Original Complaint, and would state as follows:

1. These Defendants admit the allegations of paragraph 1 of Plaintiff's Complaint for jurisdictional purposes only.
2. These Defendants are without knowledge as to the allegations of paragraph 2 of Plaintiff's Complaint, therefore denied.
3. These Defendants are without knowledge as to the allegations of paragraph 3 of Plaintiff's Complaint, therefore denied.

4. These Defendants admit that at all times material to the Plaintiff's Complaint, Boise Cascade Building Materials Distribution, L.L.C. was a Foreign Limited Liability Company doing business in the State of Florida.

5. These Defendants reallege and adopt the answers previously given to paragraphs 1 through 4 of Plaintiff's Complaint.

6. The allegations contained in paragraph 6 of Plaintiff's Complaint do not apply to answering Defendants and, thus, requires no response.

7. These Defendants deny the allegations in paragraphs 7 - 19 and demand strict proof thereof.

#### AFFIRMATIVE DEFENSES

1. At all times material to the Plaintiff's Complaint, the Plaintiff, **William Windsor**, was himself negligent, and his negligence was the sole proximate cause of his alleged damages and injuries. In the alternative, Plaintiff's negligence contributed to producing at least a portion of his alleged damages and injuries and his recovery should be reduced in proportion to his negligence.

2. This action is governed by Florida Statute §768.81, and the recovery of Plaintiff, must be diminished by the percentage of fault attributed to the Plaintiff or third parties. These Defendants' liability, if any, is limited to its percentage of responsibility for the Plaintiff's damages and not on the basis of joint and several liabilities.

3. These Defendants affirmatively state that the acts or omissions of third parties who were not under the direction or control of these Defendants proximately caused the damages complained of in this action. Pursuant to Florida Statute §768.81, Plaintiff has no right to recover from these Defendants those damages caused by the acts or omissions of such third

parties. The identities of all third parties whose acts or omissions may have proximately caused the damages complained of in this action are presently unknown. However, should ongoing discovery reveal culpable involvement in this matter by others, it is their acts or omissions to which these Defendants refer.

4. Plaintiff is not entitled to recover damages in tort for pain, suffering, mental anguish, etc., because he has not met the applicable threshold.

5. These Defendants are entitled to a setoff for any and all collateral source benefits available to Plaintiff.

6. These Defendants are entitled to a setoff of the amount of Plaintiff's elected personal injury protection deductibles.

7. These Defendants allege that if some or all of Plaintiff's special damages have been paid by collateral sources of indemnity as defined by Florida Statute §768.76 or are payable, Plaintiff is not entitled to duplicate recovery of these amounts or, in the alternative, evidence of collateral source payments should be submitted to the jury. Additionally, Plaintiff is not entitled to recover the amounts of any managed care adjustments or write-offs made by his health care providers to his medical bills. In accordance with billing requirements or guidelines of: (1) his health insurer, (2) Medicaid, (3) Medicare, or (4) any other third party payor. In the alternative, Defendants are entitled to a set-off in the amount of any write-offs or adjustments to Plaintiff's medical bills made by Plaintiff's health care providers in accordance with their managed care or other agreements with Plaintiff's HMO, health insurer, Medicaid, Medicare, or any other third party payer.

8. These Defendants state that the collateral source rule is no longer applicable, because the Patient Protection and Affordable Care Act mandates that all persons obtain health

insurance. Therefore, evidence relating to collateral source benefits received in the past and available in the future to Plaintiff is admissible and such collateral source benefits shall offset and reduce any past or future economic damages awarded.

9. In the event that the Plaintiff has obtained insurance coverage, as mandated by and under the PPACA, the Plaintiff is only permitted to recover as future medical or medical-related damages the amount of his insurance premiums necessary to maintain such coverage in the future, and any co-payments required pursuant to said coverage.

10. These Defendants would assert that the subject vehicle which the Plaintiff was riding in had available and fully operational seatbelts to be used by the occupants. Plaintiff failed to make use of those seatbelts and/or seatbelt restraint systems either entirely or in a proper manner, which was unreasonable under the circumstances. Plaintiff's failure to make use of the available and fully operational seatbelt and/or restraint system caused or contributed to his injuries. Plaintiff's recovery, if any, should therefore be barred or comparatively reduced in accordance with the percentage of damages caused by the Plaintiff's non- or improper use of the seatbelt and/or restraint system in said vehicle.

11. These Defendants would assert that the injuries and damages complained of in the Plaintiff's Complaint were legally and proximately caused by and arose out of a risk of which the Plaintiff had knowledge and understanding and voluntarily assumed.

12. These Defendants would assert that the Plaintiff has failed to mitigate his damages as required by applicable law.

13. These Defendants affirmatively allege that Plaintiff failed to mitigate his damages by availing himself of medical treatment where such medical treatment is reasonably expected to diminish his disability, discomfort and damage, and Plaintiff failed to mitigate his damages by

failing to resume gainful employment at a time when Plaintiff was physically able to do so but did not following the accident. Norman v. Mandarin Emergency Care Center, Inc., 490 So.2d 76 (Fla. 1<sup>st</sup> DCA 1986); Juvenile Diabetes Research Foundation v. Rievman, 370 So.2d 33 (Fla. 3d DCA 1979); Rubin v. Shapiro, 198 So.2d 854 (Fla.3d DCA 1967); restatement of torts, Section 918.27.

14. Plaintiff has failed to mitigate damages because the medical bills are not reasonable and/or necessary; the billing is excessive; the treatment and/or billing was not casually related to the incident; the medical providers have engaged in conduct (excessive billing or treatment) which was not reasonably foreseeable; Plaintiff has health insurance and treated under a Letter of Protection which is void against public policy and Defendants are entitled to a write-down or setoff pursuant to §641.3154, Florida Statutes and Marion v. Orlando, 67 So.3d 264 Fla. 5th DCA 2011; Plaintiff is a Medicare beneficiary, then Defendants are entitled to a write-down or setoff under the Medicare fee schedule.

15. These Defendants reserve the right to assert all other affirmative defenses that become known to them through the course of discovery in this case.

#### **DEMAND FOR JURY TRIAL**

These Defendants demand trial by jury of all issues triable as of right by jury.

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing has been furnished by Electronic Mail to: Jason P. Herman, Esquire, Dan Newlin & Partners, 7335 West Sand Lake Road Suite 300, Orlando, FL 32819; Jason.Herman@newlinlaw.com; Marlene.Zervos@newlinlaw.com;

Evelyn.Manzueta@newlinlaw.com this 10th day of October, 2018.

VERNIS & BOWLING OF  
CENTRAL FLORIDA, P.A.

1st William Hyland

WILLIAM HYLAND, ESQUIRE

Bar Number: 402265

whyland@florida-law.com

sbucek@florida-law.com

1450 S. Woodland Blvd., 4<sup>th</sup> Floor

DeLand, FL 32720

Telephone: (386) 734-2505

Facsimile: (386) 734-3441

Attorney for Defendants

# EXHIBIT

# B



IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs. Case No.: 2018-CA-010270-0

ROBERT KEITH LONGEST, an individual,  
And BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C, a  
Foreign Limited Liability Company,

Defendants.

**DEFENDANTS' ANSWER AND AFFIRMATIVE DEFENSES  
TO PLAINTIFF'S AMENDED COMPLAINT AND  
DEFENDANTS' MOTION TO DISMISS COUNTS II AND IV**

Defendants, ROBERT KEITH LONGEST, an individual, and BOISE CASCADE  
BUILDING MATERIALS DISTRIBUTION, L.L.C, a Foreign Limited Liability Company  
("Defendants"), by and through the undersigned counsel, file this Answer and Affirmative Defenses  
to Plaintiff's Amended Complaint and Motion to Dismiss Counts II and IV, and state:

1. Defendants deny the allegations stated in this paragraph.
2. Defendants deny the allegations stated in this paragraph.
3. Defendants deny the allegations stated in this paragraph.
4. Defendants deny the allegations stated in this paragraph.
5. Defendants deny the allegations stated in this paragraph.
6. Defendants deny the allegations stated in this paragraph.

**FACTS COMMONS TO ALL COUNTS**

Defendants collectively deny the allegations stated in paragraphs 7 to 54 of the Amended Complaint.

**COUNT I - NEGLIGENCE - LONGEST**

55. The responses to the cited paragraphs are re-stated as though fully set forth herein.
56. Defendants deny the allegations stated in this paragraph.
57. Defendants deny the allegations stated in this paragraph.
58. Defendants deny the allegations stated in this paragraph.

**COUNT II - INFLICTION OF EMOTIONAL DISTRESS - LONGEST**

59. This Count is subject to Defendant's Motion to Dismiss below.
60. This Count is subject to Defendant's Motion to Dismiss below.

**COUNT III - NEGLIGENCE - BOISE CASCADE**

61. The responses to the cited paragraphs are re-stated as though fully set forth herein.
62. Defendants deny the allegations stated in this paragraph.
63. Defendants deny the allegations stated in this paragraph.
64. Defendants deny the allegations stated in this paragraph.

**COUNT IV - INFLICTION OF EMOTIONAL DISTRESS - BOISE CASCADE**

65. This Count is subject to Defendant's Motion to Dismiss below.
66. This Count is subject to Defendant's Motion to Dismiss below.
67. This Count is subject to Defendant's Motion to Dismiss below.
68. This Count is subject to Defendant's Motion to Dismiss below.

**AFFIRMATIVE DEFENSES**

1. Plaintiff was negligent and that negligence was the sole and proximate cause of any alleged injuries and damages which Plaintiff allegedly sustained, thus precluding Plaintiff from any recovery.

2. Plaintiff was negligent and that negligence was a contributing cause of any alleged injuries and damages, thus reducing Plaintiff's damages, if any, in direct proportion to the negligence of Plaintiff.

3. Plaintiff failed and/or refused to take reasonable measures to mitigate the alleged damages claimed in this action, and therefore, Plaintiff's recovery, if any, should be reduced by the degree Plaintiff failed to mitigate the damages claimed in this action.

4. Pursuant to the provisions of Florida Statute 768.76, the amount of any damages awarded to Plaintiff shall be reduced by the total amount of any collateral sources of indemnity or benefit which have been paid or are available to Plaintiff.

5. Pursuant to the provisions of Florida Statute Section 768.81, any judgment against these Defendants are limited to that percentage of Plaintiff's damages caused by these Defendants' percentages of fault and not on the basis of the Doctrine of Joint and Several Liability, except as otherwise provided under Florida Statute 768.81.

WHEREFORE, Defendants respectfully request this Honorable Court enter judgment in their favor on Counts I and III of the Amended Complaint, together with costs and such other relief as this Court deems appropriate, and the Defendants further demand trial by jury on all issues.

**DEFENDANTS' MOTION TO DISMISS COUNTS II AND IV  
OF PLAINTIFF'S AMENDED COMPLAINT**

Defendants, ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C, a Foreign Limited Liability Company ("Defendants"), by and through the undersigned counsel, file this Motion to Dismiss Counts II and IV of Plaintiff's Amended Complaint, and state:

## **I. Introduction**

Plaintiff has filed an Amended Complaint seeking to bring two causes of action for “Intentional Infliction of Emotional Distress” *that have already been rejected by the Court.*

## **II. Brief Background**

### **A. Plaintiff’s First Motion for Leave (Denied without prejudice)**

On June 4, 2020, Plaintiff filed his first Motion for Leave to File an Amended Complaint (Ex. A). It attached Plaintiff’s First Amended Complaint. Plaintiff alleged Negligence against Mr. Longest (Count I), Intentional Infliction of Emotional Distress against Mr. Longest (Count II) Negligence against Boise Cascade (Count II), and Intentional Infliction of Emotional Distress against Boise Cascade (Count IV).

On July 7, 2020, the Court conducted a hearing and listened to Plaintiff’s basis for pleading emotional distress in Counts II and IV. The Court then entered its Order on Plaintiff’s Motion for Leave to File an Amended Complaint (Ex. B). The Order denied Plaintiff’s Motion without prejudice, allowing Plaintiff to refile to state further grounds for pleadings Count II and IV.

### **B. Plaintiff’s Second Motion for Leave (Denied outright)**

On July 9, 2020, Plaintiff filed his Second Motion for Leave to File an Amended Complaint (Ex. C). It attached Plaintiff’s First Amended Complaint, with the same four counts. In his new Motion, Plaintiff attempted to present grounds regarding intentional infliction of emotional distress.

On August 19, 2020, the Court conducted a hearing and gave Plaintiff the opportunity to present his Motion (again). That same day, the Court entered its Order on Second Motion for Leave to File Amended Complaint (Ex. D). It *denied* leave on Counts II and IV (emphasis added):

**“ORDERED and ADJUDGED that the Second Amended Complaint fails to state sufficient ultimate facts to state a claim for intentional infliction of emotional distress.”**

Unlike the first Order denying leave, which was without prejudice, this Order denied leave with finality, and foreclosed any further attempts by Plaintiff to seek such leave.

**C. Plaintiff's Third Motion for Leave (present motion)**

Despite the Court's Order flatly denying Plaintiff leave to plead emotional distress, Plaintiff has inexplicably filed a Third Motion for Leave to File an Amended Complaint, *which pleads the same counts* (Ex. E). This time, when Plaintiff attached his proposed pleading, he dropped the "First" and called it his "Amended Complaint." However, *his claims for emotional distress against Mr. Longest (Count II) and Boise Cascade (Count IV) are identical to the counts in his prior draft that the Court rejected.*

On October 20, 2020, the Court entered an Omnibus Order on Multiple Motions (Ex. F). In the second paragraph thereof, the Court declared that Plaintiff's Third Motion for Leave was "GRANTED," and gave the defense twenty days to respond.

Based on the Court's prior Order of August 19, 2020 (quoted above) expressly denying Plaintiff leave to plead emotional distress against Mr. Longest (Count II) and Boise Cascade (Count IV), and because the current proposed Amended Complaint has identical language for Count II and IV, those Counts should be dismissed *with prejudice*, to make it clear to Plaintiff that leave to plead such counts has been and remains denied.

WHEREFORE, Defendants respectfully request this Honorable Court enter an Order granting Defendants' Motion to Dismiss Counts II and IV, and awarding fees for the preparation of the same, in light of those Counts having been previously rejected, and for such other relief as the Court deems just and proper.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 9th day of November, 2020, to: William Windsor, billwindsor1@outlook.com and bill@billwindsor.com (Plaintiff Pro Se).

ISI Scott L. Astrin

SCOTT L. ASTRIN  
Florida Bar Number 0084557

ISI David I. Wynne, Jr.

DAVID I. WYNNE, JR.  
Florida Bar Number 326290  
Law Offices of Scott L. Astrin  
Staff Attorneys for AIG  
100 N. Tampa Street, Suite 2605  
Tampa, FL 33602

Phone: 813-218-3110

Fax: 813-649-8362

Primary Email: tampapleadings@aig.com

Secondary Email: scott.astrin@aig.com;  
anandini.maharaj@aig.com; david.wynne@aig.com

Attorney for Defendants

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF WILLIAM M. WINDSOR'S MOTION FOR LEAVE  
TO FILE AN AMENDED COMPLAINT**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff") and files  
this Motion for Leave to file an Amended Complaint pursuant to Florida Rules of Civil  
Procedure Rule 1.190, and shows the Court as follows:

**FACTUAL BACKGROUND**

1. On May 5, 2017, Windsor retained the Law Offices of Dan Newlin.
2. Windsor became disillusioned with the representation of the Law Offices of Dan Newlin ("Newlin"). Newlin did a terrible job representing Windsor.
3. Windsor was never even shown the Complaint before it was filed.
4. The Complaint erroneously claims Defendant Robert Keith Longest ("Longest") collided with a motor vehicle, causing said motor vehicle to then collide with the motor vehicle

1 **EXHIBIT A**

driven by Windsor. There was no other motor vehicle involved. The vehicle Longest was driving collided with the vehicle driven by Windsor. So, Newlin couldn't get the facts straight.

5. Windsor requested review of all discovery from Newlin before it was served. He was never shown anything until he terminated the Newlin in 2020.

6. Windsor instructed Newlin that he would attend the court reporter-transcribed statement of eyewitness Jerome Wilt, but he was never informed that the statement took place, and his important questions for Jerome Wilt were ignored.

7. Windsor instructed Newlin that he would attend the depositions of the Defendants, but he was never informed that a deposition of Longest took place, and his important questions were not used. Newlin never scheduled a deposition of Defendant Boise Cascade Building Materials Distribution, L.L.C. ("Boise Cascade") and never even identified who the corporate representative was. This was especially egregious when some Interrogatory responses of Defendant Longest were that only Boise Cascade would have the answer.

8. Longest refused to answer Interrogatory Number 5 seeking explanation of how the accident took place and what he did to avoid it, and Newlin simply ignored this and all other inadequate responses.

9. Longest and Boise Cascade made many false statements in this case, often under oath, and Newlin did nothing about the lies and the intentional infliction of emotional distress.

10. Windsor repeatedly emphasized to Newlin that it was essential that the case be brought to trial as soon as possible. This was ignored. In fact, without discussion or notice to Windsor, Newlin outrageously agreed to postpone the trial by 15 months.

11. Newlin was not responsive to Windsor's communications, and there was a parade of attorneys purportedly handling the case.



12. In their 35 months of representation, Newlin never even attempted to identify an expert witness for Windsor.

13. The Newlin attorney who purportedly handled the case for the longest period of time, Jason Herman, did not even attend the mediation. A young woman who knew little or nothing about the case handled the mediation, and it was a complete waste of time and money. Defendants' Attorney David I. Wynne essentially admitted he was clueless. He apparently was not even aware that there were two eyewitnesses who said Longest was at fault and no witness to say otherwise.

14. Windsor repeatedly attempted to get Mr. Dan Newlin himself to return his calls. Mr. Newlin never extended that courtesy. He never called or wrote. Windsor surmises that Mr. Newlin may have been too busy recording deceptive commercials and sponsoring Flo Rida concerts.

15. Newlin never got the Defendants to admit liability. The wrongdoing of the Defendants and Newlin's incompetence have left Windsor disabled, in severe pain, and without an ability to obtain the surgery and medical care that he needs. Windsor's automobile insurance has reached the maximum payable. Windsor cannot afford further medical care.

16. Windsor finally terminated Newlin.

17. It was not until Newlin sent Windsor some of the files in this case did he discover that Newlin had agreed to postpone the trial by 15 months.

18. It was not until the Law Offices of Dan Newlin sent Windsor some of the files in this case did he discover what a terrible job had been done with discovery in this case.

19. One aspect of the jury's decision-making in this case is to specify damages for pain and suffering, mental anguish, inconvenience, and impact on Windsor's enjoyment of life.

The lies, false statements, and possible bribery in this case is important for the jury to consider.

This proposed amendment to the Complaint brings this front and center.

20. Windsor's life has been devastated by this accident and the actions of the Defendants. Justice requires that leave be granted for this amended complaint.

### ARGUMENT

21. Florida Rules of Civil Procedure Rule 1.190 provides that Windsor must seek leave of court to file an amended pleading and must attach the proposed amended pleading. EXHIBIT 112 is the proposed Amended Complaint.

22. Rule 1.190 provides that leave of court shall be given freely when justice so requires. Justice so requires.

### PRAYER FOR RELIEF

23. Wherefore, Windsor moves the Court for an order granting leave to file the attached proposed Amended Complaint and granting such other and further relief as is deemed just and proper.

This 4th day of June, 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

## CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I emailed the attorney for the Defendants asking if he would oppose this Motion. There was no response.

This 4th day of June, 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Postal Service and Electronic Mail to:

David I. Wynne  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605, Tampa, Florida 33602  
david.wynne@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 4th day of June, 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

# Exhibit

# 112

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

CASE NO. 2018-CA-010270

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**FIRST AMENDED COMPLAINT**

Plaintiff, WILLIAM WINDSOR ("WINDSOR") sues the Defendants, ROBERT KEITH  
LONGEST ("LONGEST") and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Profit Corporation ("BOISE CASCADE"), and states as  
follows:

1. This is an action for damages that exceeds Fifteen Thousand Dollars (\$15,000.00) exclusive of interest, costs, and attorney's fees.
2. At all times material to this action, WINDSOR is a natural person residing in Leesburg, Lake County, Florida.
3. At all times material to this action, LONGEST is a natural person residing in Orlando, Orange County, Florida.
4. At all times material to this action, BOISE CASCADE is a Foreign Limited Liability Company authorized to and doing business in the state of Florida.
5. All other conditions precedent to the bringing of this action have been performed, have occurred, or have been waived.

6. Venue is proper in Orange County because the alleged incident occurred in Orange County.

### **FACTS COMMON TO ALL COUNTS**

7. WINDSOR is a 71-year-old senior citizen who has been driving for 55 years. Other than two minor fender benders caused by other drivers, an accident on May 5, 2017 is the only traffic accident WINDSOR has been involved in. WINDSOR does not have a traffic violation or parking ticket on his record for the last 20 years.

8. On May 5, 2017, WINDSOR was operating a motor vehicle, at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. WINDSOR was operating his vehicle according to the law and, at all times prior to impact, remained in his lane. WINDSOR was driving a tiny Pontiac Solstice convertible that weighed approximately 2,600 pounds.

9. At that time and place, LONGEST was operating a motor vehicle owned by BOISE CASCADE at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. LONGEST was driving an 18-wheeler, a semi-truck and trailer, that has a maximum legal weight of 80,000 pounds.

10. At that time and place, LONGEST operated the subject motor vehicle with the full knowledge and the express authority, permission, and consent of its owner, BOISE CASCADE.

11. At that time and place, LONGEST negligently and carelessly operated and/or maintained his vehicle so as to collide with a motor vehicle driven by WINDSOR.

12. As a result of the collision caused by the negligence of LONGEST, WINDSOR, sustained serious and permanent injuries.

13. State Trooper G.S. LINZMAYER ("LINZMAYER") responded to the 911 calls by WINDSOR, Jerome Wilt ("WILT"), and Carrie Broussard reporting the accident.

14. LONGEST intentionally and recklessly lied to LINZMAYER about the accident.

15. LONGEST intentionally and recklessly lied in the Answer to the Complaint in this case and in answers to interrogatories, production of documents, and admissions.

16. BOISE CASCADE dispatched an employee to the scene of the accident. This employee is believed to have orchestrated the lies at the scene of the accident and subsequently.

17. WINDSOR explained to LINZMAYER that LONGEST came from the lane to the left of WINDSOR into his lane, the second lane from the right shoulder, and broadsided the left side of WINDSOR's vehicle. The impact lifted the left wheels of WINDSOR's vehicle off the ground and sent WINDSOR into high-speed spins back and forth across the six lanes of the Florida Turnpike. WINDSOR thought he was going to die when his little convertible was lifted off the ground and again as he spun directly toward the cement barricade that is the median. WINDSOR has had nightmares about this.

18. LINZMAYER issued a Citation to WINDSOR. The Citation charged WINDSOR with careless driving. WINDSOR was outraged, and he made this clear to LINZMAYER. The Accident Report outrageously showed that BOISE CASCADE's vehicle was in the far right lane and that WINDSOR's vehicle spun out and was headed Northbound in the Southbound lane of the Florida Turnpike when it struck the left front of BOISE CASCADE's vehicle. This was an outlandish fabrication. WINDSOR suspected that LONGEST and/or BOISE CASCADE paid money to LINZMAYER to issue a Citation against WINDSOR.

19. BOISE CASCADE had its vehicle towed away from the scene of the accident. WINDSOR examined the vehicle at the scene, and he did not see any damage that would require

a tow truck. WINDSOR believes this was part of the DEFENDANTS' game plan to deceive LINZMAYER and the Courts to outrageously claim WINDSOR was at fault.

20. LINZMAYER told WINDSOR he would contact 911 callers to see if anyone could confirm WINDSOR's account of the accident. LINZMAYER said he would withdraw the Citation if that happened. LINZMAYER subsequently spoke with eyewitness WILT who told LINZMAYER that the BOISE CASCADE vehicle caused the accident. LINZMAYER did nothing in response. WINDSOR spoke with eyewitness Carrie Broussard who said that she saw WINDSOR's vehicle spinning counter-clockwise. LINZMAYER falsely claimed it was spinning clockwise because that fit his fabrication.

21. On August 8, 2017, WINDSOR, LONGEST, and LINZMAYER appeared before Judge Elizabeth J. Starr in the County Court of the Ninth Judicial Circuit, Case Number 2017-TR-014035-A-W. LINZMAYER testified that he did not witness the accident. LONGEST testified that he felt something, but never saw WINDSOR's vehicle. He said he then saw WINDSOR's vehicle spinning out of control in his rearview mirror. He claimed there was damage to the left front of his truck. LONGEST testified that he didn't see WINDSOR's vehicle heading toward him on the Florida Turnpike. LONGEST testified that he didn't know for sure what happened. LONGEST admitted that it was possible that he was in the third lane from the right shoulder where WINDSOR has said he was. WINDSOR asked LONGEST if he saw LINZMAYER's accident report that showed WINDSOR's vehicle was traveling Northbound in the Southbound lane. LONGEST had no explanation for how LINZMAYER's version could be accurate since he testified he never saw WINDSOR's vehicle except in his rearview mirror. LINZMAYER testified WINDSOR told him he didn't know what happened. This is absolutely



false. Judge Elizabeth J. Starr rolled her eyes at LINZMAYER's claim of the accident. She said there was no evidence WINDSOR had done anything careless, and she dismissed the case.

22. Since the accident on May 5, 2017, the DEFENDANTS have refused to admit liability for the accident. The DEFENDANTS have caused severe emotional distress with their lies and false information.

23. On November 16, 2018 LONGEST served his Verified Response to Plaintiff's Interrogatories. Longest provided a false answer to Interrogatory Number 6: "Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question." Longest swore that "Plaintiff contributed to the incident alleged in Plaintiff's Complaint by failing to observe traffic rules and/or failing to observe traffic rules and/or failing to take all reasonable steps to avoid the incident." 15 months prior to this, on August 8, 2017, Longest testified in Case Number 2017-TR-014035-A-W in the County Court of the Ninth Judicial District that he only saw the Plaintiff's vehicle spinning out of control in his rearview mirror after he felt an impact on his vehicle. On May 5, 2017, eyewitness WILT saw the accident and called 911. On August 8, 2017, WINDSOR testified that LONGEST came into his lane and broadsided WINDSOR's vehicle. On March 7, 2018, WILT swore under oath that LONGEST came into WINDSOR's lane and hit his vehicle. He swore: "The semi truck caused the accident." On April 8, 2019, WINDSOR swore under oath at s deposition that Longest and the Boise Cascade truck came into his lane and hit his vehicle.

24. In the November 16, 2018 responses to Request for Admissions, BOISE CASCADE and LONGEST denied that LONGEST was negligent in the operation of a motor vehicle which resulted in the subject collision with Plaintiff's vehicle. In the November 16, 2018

response to Request for Admissions, BOISE CASCADE and LONGEST outrageously denied that WINDSOR was injured in the accident. BOISE CASCADE and LONGEST outrageously denied that WINDSOR was not guilty of negligence which caused or contributed to the accident. BOISE CASCADE and LONGEST outrageously denied that WINDSOR incurred medical expenses for treatment of injuries resulting from the subject accident. BOISE CASCADE and LONGEST recklessly claimed WINDSOR's medical expenses were not reasonable and necessary for the care and treatment of the injuries sustained in the subject accident.

25. On November 16, 2018, BOISE CASCADE produced documents and invoices claiming damage was caused to the left front of the BOISE CASCADE vehicle. This is outrageous as LONGEST swore on August 8, 2017 that he never saw WINDSOR's vehicle ahead of his vehicle and that he only saw it in his rearview mirror after he felt an impact.

26. WINDSOR's life was severely damaged at 2:35 pm on May 5, 2017 when this accident took place. WINDSOR could have been killed.

27. LONGEST and BOISE CASCADE were negligent, and their behavior since the accident has been outrageous.

28. WINDSOR was a healthy, active, young 68-year-old man before he was hit. Now he is a disabled, second floor condo-confined, old 71-year-old victim. WINDSOR had no history of back or neck problems. There is no family history of back or neck problems.

29. Now WINDSOR can barely walk and needs cane or walker.

30. WINDSOR can no longer travel. He lives in a second-floor condo, and the stairs are a nightmare. Carrying one or more bags of groceries up the stairs is torture. WINDSOR has been issued a handicapped parking tag by the State of Florida, but it is painful to walk even a few

feet. WINDSOR's back feels like it has simply given out. It has gotten progressively worse over time.

31. WINDSOR feels like an invalid, and the DEFENDANT's have inflicted extreme emotional distress.

32. WINDSOR has seen a host of doctors and has had many X-rays, CT scans, and echocardiograms, as well as five MRIs.

33. WINDSOR now has a permanent disability with his neck. His cervical rotation is now 45-degrees to the left and 42-degrees to the right. Normal is 80-degrees.

34. WINDSOR is severely claustrophobic, so he refused to take an MRI in 2017 or early 2018. On June 7, 2018, he finally had an MRI at Clermont Radiology. The MRI showed divarication of the abdominis recti (also known as Diastasis Recti) and bulging of the intra-abdominal contents. There is a 4.5-inch separation of the muscles that are supposed to keep the abdominal contents contained. Dr. Chintan DeSai stated that it is "medically probable that the discussed findings were caused by recent accident 5/5/2017."

35. From previous consultations with Dr. Eduardo Parra Davila and Dr. Owen Fraser, divarication of the abdominis recti and bulging of the intra-abdominal contents is not something they can use surgery to repair. WINDSOR will have to receive medical care in this regard for the rest of his life.

36. After the back pain increased, Dr. Alan Newman sent WINDSOR for two MRIs. They show all kinds of injuries.

37. On March 11, 2020, WINDSOR saw Dr. Roderick Claybrooks at BioSpine. He says WINDSOR needs Lumbar Fusion -- two rods and four bolts. He says the lowest of WINDSOR's discs needs to be removed. He wanted to do the surgery right away, but since

WINDSOR has terminated Dan Newlin as his attorney, BioSpine can't move forward with surgery as they have no assurance of payment. The cost of the surgery recommended by BioSpine has been estimated at \$60,000 to \$100,000 with two days of hospitalization.

38. WINDSOR saw Michael LaFleur and Dr. Nizam Razack of Spine and Brain Neurosurgery Center in Orlando on April 10, 2020. WINDSOR was sent for two more MRIs and four X-rays. Michael LaFleur showed WINDSOR the March 20, 2019 MRI and said that it does not show a degenerative condition apart from what the accident caused.

39. On April 23, 2020, WINDSOR had two MRIs and four X-Rays at CareFirst Imaging in Ocala. Four herniated discs were noted in the MRI of the Lumbar Spine (T12-L1, L2-L3, L3-L4, and L4-L5). Disc bulges were also noted in L1-L2 and L3-L4. There were three new findings: "L3-L4: Posterior diffuse disc bulge with superimposed posterior central disc herniation." "T12-L1: Left paracentral focal disc protrusion/herniation..." "On comparison with prior study dated 3/20/2019, there is interval development of posterior central disc herniation at L3-L4."

40. Five herniated discs were noted in the MRI of the Cervical Spine (C2-C3, C3-C4, C4-C5, C5-C6, and C6-C7). Disc bulges were also noted in C6-C7 and C7-T1. Issues with the spinal cord are noted three times. There were four new findings: "Straightening of cervical lordosis." "C5-C6: Broad based posterior disc herniation with uncovertebral hypertrophic changes abutting the spinal cord." "C6-C7: Posterior central focal disc herniation...diffuse disc bulge abutting the spinal cord." "On comparison with prior study dated 3/20/2019, there is interval reduction in severity of posterior disc herniation at C2-C3. There is interval development of focal posterior central disc herniation at C6-C7."

41. An impression of the X-Ray of the Spine is "On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in severity of anterior listhesis at L5-S1, retrolisthesis at L1-L2 and development of minimal retrolistehsis at L2-L3, L3-L4 and L4-L5."

42. The impression of the X-Ray Cervical Spine Flex/Ext is: "Moderate cervical spondylosis at C5-C6" and "Instability at C2-C3, C3-C4, and C4-C5 on flexion and extension views."

43. The impression of the X-Ray L-Spine Flex/Ext is: "Exaggerated lumbar lordosis." "Moderate lumbar spondylosis." "On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in severity of anterior listhesis at L5-S1, retrolistehsis at L1-L2 and development of minimal retrolistehsis at L2-L3, L3-L4 and L4-L5."

44. Dr. Razack and Michael LaFleur say Dr. Razack cannot operate on WINDSOR's spine because of the Diastasis Recti. Dr. Parra Davila and Dr. Fraser say the Diastasis Recti is inoperable.

45. LONGEST and BOISE CASCADE have caused terrible pain and suffering to WINDSOR. WINDSOR is now disabled as the result of the accident. WINDSOR's condition has deteriorated since he was broadsided. WINDSOR has been miserable. WINDSOR can't do much of anything. WINDSOR doesn't see anyone. WINDSOR has three granddaughters who he loves more than anything, and he is now unable to go see them. WINDSOR's youngest granddaughter is a tiny four-year-old, and he is unable to hold her. WINDSOR doesn't do anything but essential trips for medical matters, pharmacy, and groceries. He expects to lose the ability to shop at a grovery store. WINDSOR's life has become sitting in a special chair and

watching TV. He can't enjoy life. The last three years has been horrible, and the thought of another 20 years of this is unbearable. LONGEST and BOISE CASCADE continue to maintain their lies. This is intentional infliction of emotional distress.

46. The Defendants continue to pretend they were not at fault. The attorney for the Defendants has pretended to be interested in settlement, but it appears to be nothing more than another lie and a delaying tactic. The Defendants did make an offer to settle for \$2,500. This is a fraction of the approximately \$50,000 in expenses WINDSOR has incurred.

47. The conduct of LONGEST and BOISE CASCADE was intentional and reckless; the conduct was outrageous; the conduct caused emotional distress; and the emotional distress was severe.

**COUNT I – ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT,**  
**ROBERT KEITH LONGEST**

48. WINDSOR adopts and realleges Paragraphs 1 through 47 as fully set forth herein.

49. LONGEST was negligent and careless in the operation of his motor vehicle so as to collide with the motor vehicle driven by WINDSOR.

50. As a direct and proximate cause of LONGEST's negligence, WINDSOR, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
- C. Aggravation or activation of an existing disease or physical defect;
- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;
- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

51. WINDSOR, will suffer or incur the injuries, expenses and impairment in the future.

WHEREFORE, Plaintiff, WILLIAM WINDSOR, demands judgment for damages against Defendant, ROBERT KEITH LONGEST, for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT II – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT, ROBERT KEITH LONGEST**

52. WINDSOR adopts and realleges Paragraphs 1 through 47 as fully set forth herein.

53. LONGEST has intentionally and recklessly inflicted emotional distress on WINDSOR. LONGEST's conduct has been outrageous. LONGEST's conduct has caused and continues to cause emotional distress to WINDSOR. The emotional distress has been and is severe.

WHEREFORE, Plaintiff, WILLIAM WINDSOR, demands judgment for damages against Defendant, ROBERT KEITH LONGEST, for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT III – ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**

54. WINDSOR, adopts and realleges Paragraphs 1 through 47 as fully set forth herein.

55. BOISE CASCADE is vicariously liable for the negligence of LONGEST, pursuant to Florida's Dangerous Instrumentality Doctrine.

56. As a direct and proximate cause of Defendants' negligence, WINDSOR, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
- C. Aggravation or activation of an existing disease or physical defect;
- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;
- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

57. WINDSOR, will suffer or incur the injuries, expenses, and impairment in the future.

**WHEREFORE**, Plaintiff, WILLIAM WINDSOR, demands judgment for damages against Defendant, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT IV – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS AGAINST DEFENDANT, BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C.**

58. WINDSOR adopts and realleges Paragraphs 1 through 47 as fully set forth herein.

59. Defendant BOISE CASCADE is vicariously liable for the negligence of LONGEST, pursuant to Florida's Dangerous Instrumentality Doctrine.

60. BOISE CASCADE has intentionally and recklessly inflicted emotional distress on WINDSOR. BOISE CASCADE's conduct has been outrageous. BOISE CASCADE's conduct



has caused and continues to cause emotional distress to WINDSOR. The emotional distress has been and is severe.

61. Plaintiff, WILLIAM WINDSOR, will suffer or incur the injuries in the future.

**WHEREFORE**, Plaintiff, WILLIAM WINDSOR, demands judgment for damages against Defendant, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**DEMAND FOR JURY TRIAL**

Plaintiff, WILLIAM WINDSOR, demands a jury trial on all issues so triable of each and every one of the Counts set forth above.

**RESPECTFULLY** submitted and DATED this 4th day of June, 2020,



William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I have emailed the attorney asking if he will oppose this Amendment. He did not respond expressing opposition.

This 4th day of June, 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

Postal Service and Electronic Mail to:

David I. Wynne  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com  
813-526-0559  
813-218-3110  
Fax: 813-649-8362

This \_\_\_\_ day of June, 2020.

---

**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 2018-CA-010270-0

WILLIAM WINDSOR  
Plaintiff(s),

vs.

ROBERT KEITH LONGEST  
Defendant(s)

**ORDER ON PLAINTIFF'S MOTION FOR LEAVE TO FILE AN AMENDED  
COMPLAINT**

THIS CAUSE having come before the Court and the Court being otherwise duly advised  
in the premises it is hereby

**ORDERED and ADJUDGED** that the Plaintiff's Motion for Leave to File an Amended  
Complaint is hereby denied without prejudice.

DONE AND ORDERED on this 7th day of July, 2020.



Lisa T. Munyon  
Circuit Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 7th  
day of July, 2020 by using the Florida Courts E-filing Portal System. Accordingly, a copy of the  
foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal  
Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal  
System.

Judicial Assistant to Judge Lisa T. Munyon

**EXHIBIT B**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM M. WINDSOR,

CASE NO. 2018-CA-010270

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

**PLAINTIFF WILLIAM M. WINDSOR'S SECOND MOTION FOR LEAVE  
TO FILE AN AMENDED COMPLAINT**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff"), and files  
this Second Motion for Leave to file an Amended Complaint pursuant to Florida Rules of Civil  
Procedure Rule 1.190, and shows the Court as follows:

**FACTUAL BACKGROUND**

1. On May 5, 2017, Windsor retained the Law Offices of Dan Newlin ("Newlin").
2. Windsor became disillusioned with the representation of Newlin. The firm did a terrible job representing Windsor.
3. Windsor was never even shown the Complaint before it was filed.
4. The Complaint erroneously claims Defendant Robert Keith Longest ("Longest") collided with a motor vehicle, causing said motor vehicle to then collide with the motor vehicle driven by Windsor. There was no other motor vehicle involved. The vehicle Longest was driving collided with the vehicle driven by Windsor. So, Newlin couldn't get the facts straight.

1 **EXHIBIT C**

5. Windsor requested review of all discovery from Newlin before it was served. He was never shown anything until he terminated the Newlin in 2020. Windsor wasn't even informed of discovery events.

6. Newlin was not responsive to Windsor's communications, and there was a parade of attorneys purportedly handling the case.

7. The wrongdoing of the Defendants and Newlin's incompetence have left Windsor disabled, in severe pain, and without an ability to obtain the surgery and medical care that he needs. Windsor's automobile insurance has reached the maximum payable. Windsor cannot afford further medical care.

8. Windsor finally terminated Newlin.

9. Windsor's life has been devastated by this accident and the actions of the Defendants. Windsor has no "enjoyment of life."

10. The Defendants' conduct was intentional and reckless, and they should have known emotional distress would result. Their conduct has been outrageous.

### **ARGUMENT**

11. This is the second request for leave to amend. The Court instructed Windsor to remove paragraphs 15, 21, 22, 23, 24, 25, and 46 from the first draft, and this has been done.

### **THE COMPLAINT CONTAINS ERRORS THAT SHOULD BE CORRECTED.**

12. As noted above, the Complaint contains errors that should be corrected.

**THE TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
IS RECOGNIZED IN FLORIDA.**

13. The tort of "intentional infliction of emotional distress" is recognized in Florida. The Florida Supreme Court established this in *Metropolitan Life Insurance Co. v. McCarson*, 467 So.2d 277 (Fla. 1985). (See also *Dominguez v. Equitable Life Assurance Society*, 438 So.2d 58 (Fla. 3d DCA 1983); *Scheuer v. Willie*, 385 So.2d 1076 (Fla. 4th DCA 1980); *Food Fair, Inc. v. Anderson*, 382 So.2d 150 (Fla. 5th DCA 1980); *Ford Motor Credit Co. v. Sheehan*, 373 So.2d 956 (Fla. 1st DCA), cert. dismissed, 379 So.2d 204 (Fla. 1979).)

14. Windsor's emotional distress stems from the incident in which impact occurred. Florida courts permit recovery for emotional distress stemming from the incident during which the impact occurred, and not merely the impact itself. (*Gilliam v. Stewart*, 291 So.2d 593 (Fla. 1974).)

**WINDSOR HAS PROPERLY EXPRESSED ALL OF THE ELEMENTS OF THE  
TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

15. Windsor has properly expressed all of the elements of Intentional Infliction of Emotional Distress.

16. The amendment will not be futile.

17. The case has not progressed to a point that liberality ordinarily to be indulged has diminished.

18. The proposed amendment will not change the basic issue in the case or materially vary the originally asserted grounds for relief.

19. The trial is set for a year from now, so this places no burden on the dishonest Defendants and will not prejudice them.

**WINDSOR'S EMOTIONAL DISTRESS IS SEVERE.**

20. Severity of emotional distress is key in whether this cause of action is viable.

Windsor has felt he would be relieved if he were dead. He has difficulty standing, much less walking or running. He wets his pants every day. He feels as if nothing can be done to help him. He has to deal with the never-ending wrongdoing by the attorneys for the Defendants. The people who destroyed his life won't admit liability and have offered little or nothing to settle the case.

**WINDSOR DOES NOT WANT TO BE DENIED THE RIGHT TO PRESENT EVIDENCE TO THE JURY.**

21. In most traffic accident cases, a traffic ticket and testimony from a law enforcement officer are not allowed. By adding these causes of action for intentional infliction of emotional distress, the Defendants and the Court should not be able to deny Windsor such evidence.

22. One aspect of the jury's decision-making in this case is to specify damages for pain and suffering, mental anguish, inconvenience, and impact on Windsor's enjoyment of life. The lies, false statements, and possible bribery in this case are important for the jury to consider. This proposed amendment to the Complaint brings this front and center.

**JUSTICE REQUIRES THAT WINDSOR BE GRANTED LEAVE OF COURT TO AMEND THE COMPLAINT.**

23. Florida Rules of Civil Procedure Rule 1.190 provides that leave of court to amend a complaint shall be given freely when justice so requires.

**THE TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
IS RECOGNIZED IN FLORIDA.**

13. The tort of "intentional infliction of emotional distress" is recognized in Florida. The Florida Supreme Court established this in *Metropolitan Life Insurance Co. v. McCarson*, 467 So.2d 277 (Fla.1985). (See also *Dominguez v. Equitable Life Assurance Society*, 438 So.2d 58 (Fla. 3d DCA 1983); *Scheuer v. Willie*, 385 So.2d 1076 (Fla. 4th DCA 1980); *Food Fair, Inc. v. Anderson*, 382 So.2d 150 (Fla. 5th DCA 1980); *Ford Motor Credit Co. v. Sheehan*, 373 So.2d 956 (Fla. 1st DCA), cert. dismissed, 379 So.2d 204 (Fla.1979).)

14. Windsor's emotional distress stems from the incident in which impact occurred. Florida courts permit recovery for emotional distress stemming from the incident during which the impact occurred, and not merely the impact itself. (*Gilliam v. Stewart*, 291 So.2d 593 (Fla.1974).)

**WINDSOR HAS PROPERLY EXPRESSED ALL OF THE ELEMENTS OF THE  
TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

15. Windsor has properly expressed all of the elements of Intentional Infliction of Emotional Distress.

16. The amendment will not be futile.

17. The case has not progressed to a point that liberality ordinarily to be indulged has diminished.

18. The proposed amendment will not change the basic issue in the case or materially vary the originally asserted grounds for relief.

19. The trial is set for a year from now, so this places no burden on the dishonest Defendants and will not prejudice them.



24. There is significant case law to support this amendment, including *Odom v. Canal Ins. Co.*, 582 So.2d 1203, 1205 (Fla. 1st DCA 1991); *EAC USA, Inc. v. Kawa*, 805 So.2d 1, 5 (Fla. 2d DCA 2001); (*Sun Valley Homeowners, Inc. v. American Land Lease, Inc.*, 927 So.2d 259 (Fla. App. Dist.2 05/10/2006); *Pangea Produce Distributors, Inc. v. Franco's Produce, Inc.*, 3D18-1026 (Fla. App. Dist.3 07/03/2019); *Haag v. Phillips*, 333 So.2d 507 (Fla. App. Dist.2 06/18/1976).)

25. Windsor's life has been devastated by this accident and the actions of the Defendants. Justice requires that leave be granted for this amended complaint.

26. Florida Rules of Civil Procedure Rule 1.190 provides that Windsor must seek leave of court to file an amended pleading and must attach the proposed amended pleading. EXHIBIT A is the proposed Amended Complaint.

#### PRAYER FOR RELIEF

27. Wherefore, Windsor moves the Court for an order granting leave to file the attached proposed Amended Complaint and granting such other and further relief as is deemed just and proper.

This 9th day of July 2020.

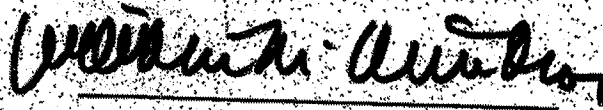


**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com billwindsor1@outlook.com

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I have conferred with the attorney for the Defendants asking if he would oppose this Motion, and he opposes.

This 9th day of July 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

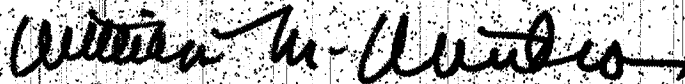
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

Postal Service and Electronic Mail to:

David I. Wynne  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605, Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com, emily.christopher@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 9th day of July 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

# Exhibit

# A

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM M. WINDSOR,

CASE NO. 2018-CA-010270

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**FIRST AMENDED COMPLAINT**

Plaintiff, WILLIAM M. WINDSOR ("WINDSOR") sues the Defendants, ROBERT  
KEITH LONGEST ("LONGEST") and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Profit Corporation ("BOISE CASCADE"), and states as  
follows:

1. This is an action for damages that exceeds Fifteen Thousand Dollars (\$15,000.00) exclusive of interest, costs, and attorney's fees.
2. At all times material to this action, WINDSOR is a natural person residing in Leesburg, Lake County, Florida.
3. At all times material to this action, LONGEST is a natural person residing in Orlando, Orange County, Florida.
4. At all times material to this action, BOISE CASCADE is a Foreign Limited Liability Company authorized to and doing business in the state of Florida.
5. All other conditions precedent to the bringing of this action have been performed, have occurred, or have been waived.

6. Venue is proper in Orange County because the alleged incident occurred in Orange County.

### **FACTS COMMON TO ALL COUNTS**

7. WINDSOR is a 71-year-old senior citizen who has been driving for 55 years. Other than two minor fender benders caused by other drivers, an accident on May 5, 2017 is the only traffic accident WINDSOR has been involved in. WINDSOR does not have a traffic violation or parking ticket on his record for the last 20 years.

8. On May 5, 2017, WINDSOR was operating a motor vehicle, at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. WINDSOR was operating his vehicle according to the law and, at all times prior to impact, remained in his lane. WINDSOR was driving a tiny Pontiac Solstice convertible that weighed approximately 2,600 pounds.

9. At that time and place, LONGEST was operating a motor vehicle owned by BOISE CASCADE at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. LONGEST was driving an 18-wheeler, a semi-truck and trailer, that has a maximum legal weight of 80,000 pounds.

10. At that time and place, LONGEST operated the subject motor vehicle with the full knowledge and the express authority, permission, and consent of its owner, BOISE CASCADE.

11. At that time and place, LONGEST negligently and carelessly operated and/or maintained his vehicle so as to collide with a motor vehicle driven by WINDSOR.

12. As a result of the collision caused by the negligence of LONGEST, WINDSOR, sustained serious and permanent injuries.

13. State Trooper G.S. LINZMAYER ("LINZMAYER") responded to the 911 calls by WINDSOR, LONGEST, Jerome Wilt ("WILT"), and Carrie Broussard ("BROUSSARD") reporting the accident.

14. LONGEST intentionally and recklessly lied to LINZMAYER about the accident.

15. BOISE CASCADE dispatched an employee, Chris Mello ("MELLO"), to the scene of the accident. MELLO is believed to have orchestrated the lies at the scene of the accident and subsequently.

16. WINDSOR explained to LINZMAYER that LONGEST came from the lane to the left of WINDSOR into his lane, the second lane from the right shoulder, and broadsided the left side of WINDSOR's vehicle. The impact lifted the left wheels of WINDSOR's vehicle off the ground and sent WINDSOR into high-speed spins back and forth across the six lanes of the Florida Turnpike. WINDSOR thought he was going to die when his little convertible was lifted off the ground and again as he spun directly toward the cement barricade that is the median. WINDSOR has had nightmares about this.

17. LINZMAYER issued a Citation to WINDSOR. The Citation charged WINDSOR with careless driving. WINDSOR was outraged, and he made this clear to LINZMAYER. The Accident Report outrageously showed that BOISE CASCADE's vehicle was in the far right lane and that WINDSOR's vehicle spun out and was headed Northbound in the Southbound lane of the Florida Turnpike when it struck the left front of BOISE CASCADE's vehicle. This was an outlandish fabrication. WINDSOR suspected that LONGEST and/or BOISE CASCADE may have paid money to LINZMAYER to issue a Citation against WINDSOR.

18. BOISE CASCADE had its vehicle towed away from the scene of the accident. WINDSOR examined the vehicle at the scene, and he did not see any damage that would require a tow truck. WINDSOR believes this was part of the DEFENDANTS' game plan to deceive LINZMAYER and the Courts to outrageously claim WINDSOR was at fault.

19. LINZMAYER told WINDSOR he would contact 911 callers to see if anyone could confirm WINDSOR's account of the accident. LINZMAYER said he would withdraw the Citation if that happened. LINZMAYER subsequently spoke with eyewitness WILT who told LINZMAYER that the BOISE CASCADE vehicle caused the accident. LINZMAYER did nothing in response. WINDSOR spoke with eyewitness BROUSSARD who said that she saw WINDSOR's vehicle spinning counterclockwise. LINZMAYER falsely claimed it was spinning clockwise because that fit his fabrication.

20. LONGEST and BOISE CASCADE were negligent, and their behavior since the accident has been outrageous.

21. WINDSOR was a healthy, active, young 68-year-old man before he was hit. Now he is a disabled, second floor condo-confined, old 71-year-old victim. WINDSOR had no history of back or neck problems. There is no family history of back or neck problems.

22. Now WINDSOR can barely walk and needs cane or walker.

23. WINDSOR can no longer travel. He lives in a second-floor condo, and the stairs are a nightmare. Carrying just one bag of groceries up the stairs is torture. WINDSOR has been issued a handicapped parking tag by the State of Florida, but it is painful to walk even a few feet. WINDSOR's back feels like it has simply given out. It has gotten progressively worse over time.

24. WINDSOR feels like an invalid, and the DEFENDANT's have inflicted extreme emotional distress.

25. WINDSOR has seen a host of doctors and has had many X-rays, CT scans, and echocardiograms, as well as five MRIs.

26. WINDSOR now has a permanent disability with his neck. His cervical rotation is 45-degrees to the left and 42-degrees to the right. Normal is 80-degrees.

27. WINDSOR is severely claustrophobic, so he refused to take an MRI in 2017 or early 2018. On June 7, 2018, he finally had an MRI at Clermont Radiology. The MRI showed divarication of the abdominis recti (also known as Diastasis Recti) and bulging of the intra-abdominal contents. There is a 4.5-inch separation of the muscles that are supposed to keep the abdominal contents contained. Dr. Chintan Desai stated that it is "medically probable that the discussed findings were caused by recent accident 5/5/2017."

28. From previous consultations with Dr. Eduardo Parra Davila and Dr. Owen Fraser, divarication of the abdominis recti and bulging of the intra-abdominal contents is not something they can use surgery to repair. WINDSOR will have to receive medical care in this regard for the rest of his life.

29. After the back pain increased, Dr. Alan Newman sent WINDSOR for two MRIs. They show all kinds of injuries.

30. On March 11, 2020, WINDSOR saw Dr. Roderick Claybrooks at BioSpine. He says WINDSOR needs Lumbar Fusion – two rods and four bolts. He says the lowest of WINDSOR's discs needs to be removed. He wanted to do the surgery right away, but since WINDSOR has terminated Dan Newlin as his attorney, BioSpine can't move forward with



surgery as they have no assurance of payment. The cost of the surgery recommended by BioSpine has been estimated at \$60,000 to \$100,000 with two days of hospitalization.

31. WINDSOR saw Michael LaFleur and Dr. Nizam Razack of Spine and Brain Neurosurgery Center in Orlando on April 10, 2020. WINDSOR was sent for two more MRIs and four X-rays. Michael LaFleur showed WINDSOR the March 20, 2019 MRI and said that it does not show a degenerative condition apart from what the accident caused.

32. On April 23, 2020, WINDSOR had two MRIs and four X-Rays at CareFirst Imaging in Ocala. Four herniated discs were noted in the MRI of the Lumbar Spine (T12-L1, L2-L3, L3-L4, and L4-L5). Disc bulges were also noted in L1-L2 and L3-L4. There were three new findings: "L3-L4: Posterior diffuse disc bulge with superimposed posterior central disc herniation." "T12-L1: Left paracentral focal disc protrusion/herniation..." "On comparison with prior study dated 3/20/2019, there is interval development of posterior central disc herniation at L3-L4."

33. Five herniated discs were noted in the MRI of the Cervical Spine (C2-C3, C3-C4, C4-C5, C5-C6, and C6-C7). Disc bulges were also noted in C6-C7 and C7-T1. Issues with the spinal cord are noted three times. There were four new findings: "Straightening of cervical lordosis." "C5-C6: Broad based posterior disc herniation with uncovertebral hypertrophic changes abutting the spinal cord." "C6-C7: Posterior central focal disc herniation, diffuse disc bulge abutting the spinal cord." "On comparison with prior study dated 3/20/2019, there is interval reduction in severity of posterior disc herniation at C2-C3. There is interval development of focal posterior central disc herniation at C6-C7."

34. An impression of the X-Ray of the Spine is "On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in

severity of anterior listhesis at L5-S1, retrolisthesis at L1-L2 and development of minimal retrolisthesis at L2-L3, L3-L4 and L4-L5.”

35. The impression of the X-Ray Cervical Spine Flex/Ext is: “Moderate cervical spondylosis at C5-C6” and “Instability at C2-C3, C3-C4, and C4-C5 on flexion and extension views.”

36. The impression of the X-Ray L-Spine Flex/Ext is: “Exaggerated lumbar lordosis.” “Moderate lumbar spondylosis.” “On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in severity of anterior listhesis at L5-S1, retrolisthesis at L1-L2 and development of minimal retrolisthesis at L2-L3, L3-L4 and L4-L5.”

37. Dr. Razack and Michael LaFleur say Dr. Razack cannot operate on WINDSOR’s spine because of the Diastasis Recti. Dr. Parra Davila and Dr. Fraser say the Diastasis Recti is inoperable.

38. LONGEST and BOISE CASCADE have caused terrible pain and suffering to WINDSOR. WINDSOR is now disabled as the result of the accident. WINDSOR’s condition has deteriorated since he was broadsided. He has been miserable. He can’t do much of anything. WINDSOR doesn’t see anyone. He has three granddaughters who he loves more than anything, and he is now unable to go see them. His youngest granddaughter is a tiny four-year-old, and he is unable to hold her. WINDSOR doesn’t do anything but essential trips for medical matters, pharmacy, and groceries. He expects to lose the ability to shop at a grocery store. WINDSOR’s life has become sitting in a special chair and watching TV. He can’t enjoy life. The last three years has been horrible, and the thought of another 20 years of this is unbearable.

LONGEST and BOISE CASCADE continue to maintain their lies. This is intentional infliction of emotional distress.

39. The conduct of LONGEST and BOISE CASCADE was intentional and reckless; the conduct was outrageous; the conduct caused emotional distress; and the emotional distress was severe.

**COUNT I - ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT.**

**ROBERT KEITH LONGEST**

40. WINDSOR adopts and realleges Paragraphs 1 through 39 as fully set forth herein.

41. LONGEST was negligent and careless in the operation of his motor vehicle so as to collide with the motor vehicle driven by WINDSOR.

42. As a direct and proximate cause of LONGEST's negligence, WINDSOR, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
- C. Aggravation or activation of an existing disease or physical defect;
- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;
- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

43. WINDSOR will suffer or incur the injuries, expenses and impairment in the future.

WHEREFORE, Plaintiff, WILLIAM M. WINDSOR, demands judgment for damages against Defendant, ROBERT KEITH LONGEST, for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and.

otherwise deemed proper by the Court.

**COUNT II – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT, ROBERT KEITH LONGEST**

44. WINDSOR adopts and realleges Paragraphs 1 through 39 as fully set forth herein.

45. LONGEST has intentionally and recklessly inflicted mental suffering and emotional distress on WINDSOR. LONGEST's conduct has been outrageous. LONGEST's conduct has caused and continues to cause emotional distress to WINDSOR. The emotional distress has been and is severe.

WHEREFORE, Plaintiff, WILLIAM M. WINDSOR, demands judgment for damages against Defendant, ROBERT KEITH LONGEST, for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT III – ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**

46. WINDSOR adopts and realleges Paragraphs 1 through 39 as fully set forth herein.

47. BOISE CASCADE is vicariously liable for the negligence of LONGEST, pursuant to Florida's Dangerous Instrumentality Doctrine.

48. As a direct and proximate cause of Defendants' negligence, WINDSOR, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement.
- C. Aggravation or activation of an existing disease or physical defect.
- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;

- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

49. WINDSOR will suffer or incur the injuries, expenses, and impairment in the future.

**WHEREFORE**, Plaintiff, WILLIAM M. WINDSOR, demands judgment for damages against Defendant, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT IV – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**

50. WINDSOR adopts and realleges Paragraphs 1 through 39 as fully set forth herein.

51. Defendant BOISE CASCADE is vicariously liable for the negligence of LONGEST, pursuant to Florida's Dangerous Instrumentality Doctrine.

52. BOISE CASCADE has intentionally and recklessly inflicted mental suffering and emotional distress on WINDSOR. BOISE CASCADE's conduct has been outrageous. BOISE CASCADE's conduct has caused and continues to cause emotional distress to WINDSOR. The emotional distress has been and is severe.

53. Plaintiff, WILLIAM M. WINDSOR, will suffer or incur the injuries in the future.

**WHEREFORE**, Plaintiff, WILLIAM M. WINDSOR, demands judgment for damages against Defendant, BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**DEMAND FOR JURY TRIAL**

Plaintiff, WILLIAM M. WINDSOR, demands a jury trial on all issues so triable of each and every one of the Counts set forth above.

**RESPECTFULLY** submitted and DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020,

---

**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I have consulted with the attorney asking if he will oppose this Amendment. He does.

This \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

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813-526-0559  
813-218-3110  
Fax: 813-649-8362

This \_\_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
**William M. Windsor**  
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352-577-9988  
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IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 48-2018-CA-010270-O

WILLIAM WINDSOR

Plaintiff(s)

vs.

ROBERT KEITH LONGEST  
BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION LLC

Defendant(s)

**ORDER ON SECOND MOTION FOR LEAVE TO FILE  
AN AMENDED COMPLAINT**

THIS CAUSE having come before the Court for hearing on August 19, 2020 and the Court being otherwise duly advised in the premises it is hereby

**ORDERED and ADJUDGED** that the Second Motion for Leave to File an Amended Complaint is hereby **DENIED**. The Second Amended Complaint fails to state sufficient ultimate facts to state a claim for intentional infliction of emotional distress.

**DONE AND ORDERED** on this 19th day of August, 2020.



Lisa T. Munyon  
Circuit Judge

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 19th day of August, 2020 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal System.

Judicial Assistant to Judge Lisa T. Munyon

**EXHIBIT D**



IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM M. WINDSOR,

CASE NO. 2018-CA-010270

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

**PLAINTIFF WILLIAM M. WINDSOR'S THIRD MOTION FOR LEAVE  
TO FILE AN AMENDED COMPLAINT**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff"), and files  
this Third Motion for Leave to file an Amended Complaint pursuant to Florida Rules of Civil  
Procedure Rule 1.190, and shows the Court as follows:

**FACTUAL BACKGROUND**

1. On May 5, 2017, Windsor retained the Law Offices of Dan Newlin ("Newlin").
2. Windsor became disillusioned with the representation of Newlin. The firm did a terrible job representing Windsor.
3. Windsor was never even shown the Complaint before it was filed.
4. The Complaint erroneously claims Defendant Robert Keith Longest ("Longest") collided with a motor vehicle, causing said motor vehicle to then collide with the motor vehicle driven by Windsor. There was no other motor vehicle involved. The vehicle Longest was driving collided with the vehicle driven by Windsor. So, Newlin couldn't get the facts straight.

<sup>1</sup> **EXHIBIT E**

5. Windsor requested review of all discovery from Newlin before it was served. He was never shown anything until he terminated the Newlin in 2020. Windsor wasn't even informed of discovery events.

6. Newlin was not responsive to Windsor's communications, and there was a parade of attorneys purportedly handling the case.

7. The wrongdoing of the Defendants and Newlin's incompetence have left Windsor disabled, in severe pain, and without an ability to obtain the surgery and medical care that he needs. Windsor's automobile insurance has reached the maximum payable. Windsor cannot afford further medical care.

8. Windsor finally terminated Newlin.

9. Windsor's life has been devastated by this accident and the actions of the Defendants. Windsor has no "enjoyment of life."

10. The Defendants' conduct was intentional and reckless, and they should have known emotional distress would result. Their conduct has been outrageous.

### **ARGUMENT**

11. This is the third request for leave to amend. The Court instructed Windsor to remove paragraphs 15, 21, 22, 23, 24, 25, and 46 that stated facts from the first draft, and this was done. Then on August 19, 2020, this Court denied the second request stating there were insufficient facts. The Amended Complaint is attached as EXHIBIT 3.

### **WINDSOR HAS ADDED FACTS.**

12. Since this Court now says the facts were inadequate, Windsor has added facts once again.

**THE TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
IS RECOGNIZED IN FLORIDA.**

13. The tort of "intentional infliction of emotional distress" is recognized in Florida. The Florida Supreme Court established this in *Metropolitan Life Insurance Co. v. McCarson*, 467 So.2d 277 (Fla.1985). (See also *Dominguez v. Equitable Life Assurance Society*, 438 So.2d 58 (Fla. 3d DCA 1983); *Scheuer v. Willie*, 385 So.2d 1076 (Fla. 4th DCA 1980); *Food Fair, Inc. v. Anderson*, 382 So.2d 150 (Fla. 5th DCA 1980); *Ford Motor Credit Co. v. Sheehan*, 373 So.2d 956 (Fla. 1st DCA), cert. dismissed, 379 So.2d 204 (Fla.1979).)

14. Windsor's emotional distress stems from the incident in which impact occurred. Florida courts permit recovery for emotional distress stemming from the incident during which the impact occurred, and not merely the impact itself. (*Gilliam v. Stewart*, 291 So.2d 593 (Fla.1974).)

**WINDSOR HAS PROPERLY EXPRESSED ALL OF THE ELEMENTS OF THE  
TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

15. Windsor has properly expressed all of the elements of Intentional Infliction of Emotional Distress.

16. The amendment will not be futile.

17. The case has not progressed to a point that liberality ordinarily to be indulged has diminished.

18. The proposed amendment will not change the basic issue in the case or materially vary the originally asserted grounds for relief.

19. The trial is set for a year from now, so this places no burden on the dishonest Defendants and will not prejudice them.

### **WINDSOR'S EMOTIONAL DISTRESS IS SEVERE.**

20. Severity of emotional distress is key in whether this cause of action is viable.

Windsor has felt he would be relieved if he were dead. He has difficulty standing, much less walking or running. He wets his pants every day. He feels as if nothing can be done to help him. He has to deal with the never-ending wrongdoing by the attorneys for the Defendants. The people who destroyed his life won't admit liability and have offered little or nothing to settle the case. He does not have the ability to obtain the medical treatment he needs.

### **WINDSOR DOES NOT WANT TO BE DENIED**

### **THE RIGHT TO PRESENT EVIDENCE TO THE JURY.**

21. In most traffic accident cases, a traffic ticket and testimony from a law enforcement officer are not allowed. By adding these causes of action for intentional infliction of emotional distress, the Defendants and the Court should not be able to deny Windsor such evidence.

22. One aspect of the jury's decision-making in this case is to specify damages for pain and suffering, mental anguish, inconvenience, and impact on Windsor's enjoyment of life. The lies, false statements, and possible bribery in this case are important for the jury to consider. This proposed amendment to the Complaint brings this front and center.

### **JUSTICE REQUIRES THAT WINDSOR BE GRANTED LEAVE OF COURT TO AMEND THE COMPLAINT.**

23. Florida Rules of Civil Procedure Rule 1.190 provides that leave of court to amend a complaint shall be given freely when justice so requires.

24. There is significant case law to support this amendment, including *Odom v. Canal Ins. Co.*, 582 So.2d 1203, 1205 (Fla. 1st DCA 1991); *EAC USA, Inc. v. Kawa*, 805 So.2d 1, 5 (Fla. 2d DCA 2001); (*Sun Valley Homeowners, Inc. v. American Land Lease, Inc.*, 927 So.2d 259 (Fla.App. Dist.2 05/10/2006); *Pangea Produce Distributors, Inc. v. Franco's Produce, Inc.*, 3D18-1026 (Fla.App. Dist.3 07/03/2019); *Haag v. Phillips*, 333 So.2d 507 (Fla.App. Dist.2 06/18/1976).)

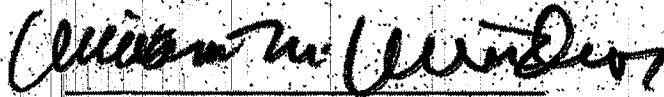
25. Windsor's life has been devastated by this accident and the actions of the Defendants. Justice requires that leave be granted for this amended complaint.

26. Florida Rules of Civil Procedure Rule 1.190 provides that Windsor must seek leave of court to file an amended pleading and must attach the proposed amended pleading. EXHIBIT 3 is the proposed Amended Complaint.

#### PRAYER FOR RELIEF

27. Wherefore, Windsor moves the Court for an order granting leave to file the attached proposed Amended Complaint and granting such other and further relief as is deemed just and proper.

This 19th day of August 2020.



William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com billwindsor1@outlook.com

## CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I have previously conferred with the attorney for the Defendants asking if he would oppose this Motion, and he opposes. He opposed it at the hearing on August 19, 2020.

This 19th day of August 2020.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

Postal Service and Electronic Mail to:

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813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 19th day of August 2020.



**William M. Windsor**  
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# EXHIBIT

## 3

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM M. WINDSOR,

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

CASE NO. 2018-CA-010270-0

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**AMENDED COMPLAINT**

Plaintiff, WILLIAM M. WINDSOR ("Windsor") sues the Defendants, ROBERT KEITH LONGEST ("Longest") and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., a Foreign Profit Corporation ("Boise Cascade"), and states as follows:

1. This is an action for damages that exceeds Fifteen Thousand Dollars (\$15,000.00) exclusive of interest, costs, and attorney's fees.
2. At all times material to this action, Windsor is a natural person residing in Leesburg, Lake County, Florida.
3. At all times material to this action, Longest is a natural person residing in Orlando, Orange County, Florida.
4. At all times material to this action, Boise Cascade is a Foreign Limited Liability Company authorized to and doing business in the state of Florida.
5. All other conditions precedent to the bringing of this action have been performed, have occurred, or have been waived.



6. Venue is proper in Orange County because the alleged incident occurred in Orange County.

### **FACTS COMMON TO ALL COUNTS**

7. Windsor is a 71-year-old senior citizen who has been driving for 55 years. Other than two minor fender benders caused by other drivers, an accident on May 5, 2017 is the only traffic accident Windsor has been involved in. Windsor does not have a traffic violation or parking ticket on his record for the last 20 years.

8. On May 5, 2017, Windsor was operating a motor vehicle, at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. Windsor was operating his vehicle according to the law and, at all times prior to impact, remained in his lane. Windsor was driving a tiny Pontiac Solstice convertible that weighed approximately 2,600 pounds.

9. At that time and place, Longest was operating a motor vehicle owned by Boise Cascade at or near mile marker 268 on State Road 91 (Florida Turnpike) southbound, Orlando, Orange County, Florida. Longest was driving an 18-wheeler, a semi-truck and trailer, that has a maximum legal weight of 80,000 pounds.

10. At that time and place, Longest operated the subject motor vehicle with the full knowledge and the express authority, permission, and consent of its owner, Boise Cascade.

11. At that time and place, Longest negligently and carelessly operated and/or maintained his vehicle so as to collide with a motor vehicle driven by Windsor.

12. As a result of the collision caused by the negligence of Longest, Windsor sustained serious and permanent injuries.

13. State Trooper G.S. Linzmayer ("Linzmayer") responded to the 911 calls by Windsor, Jerome Wilt ("Wilt"), Carrie Broussard, and Longest reporting the accident.
14. Longest intentionally and recklessly lied to Linzmayer about the accident.
15. Longest provided a report to Boise Cascade that communicated some truths about the accident, but this report was concealed from the Plaintiff for over 500 days.
16. Longest and Boise Cascade intentionally and recklessly lied in the Answer to the Complaint in this case and in answers to interrogatories, production of documents, and admissions. Longest's report proves lies by Longest and Boise Cascade. Longest knew what happened, and Boise Cascade had the report from Longest that proved their filings in this case were knowingly false. This is outrageous and so extreme in degree as to go beyond all possible bounds of decency and to be regarded as atrocious, and utterly intolerable in a civilized community. The specific behavior of Longest and Boise Cascade was intentional.
17. Boise Cascade dispatched an employee to the scene of the accident. This employee is believed to have orchestrated the lies at the scene of the accident and subsequently. The Defendants concealed his identity and have refused to provide contact information. Windsor believes Boise Cascade and its attorneys have a pattern and practice of lying and inflicting emotional distress on their victims.
18. Windsor explained to Linzmayer that Longest came from the lane to the left of Windsor into his lane, the second lane from the right shoulder, and broadsided the left side of Windsor's vehicle. The impact lifted the left wheels of Windsor's vehicle off the ground and sent Windsor into high-speed spins back and forth across the six lanes of the Florida Turnpike. Windsor thought he was going to die when his little convertible was lifted off the ground and again as he spun directly toward the cement barricade that is the median. Windsor has had

nightmares about this. If you've never been near death, you can't fully appreciate what emotional distress is.

19. Linzmayer issued a Citation to Windsor. The Citation charged Windsor, with careless driving. Windsor was outraged, and he made this clear to Linzmayer. The Accident Report falsely and maliciously showed that Boise Cascade's vehicle was in the far-right lane and that Windsor's vehicle spun out and was headed Northbound in the Southbound lane of the Florida Turnpike when it struck the left front of Boise Cascade's vehicle. This was an outlandish fabrication. Windsor suspected that Longest and/or Boise Cascade paid money to Linzmayer to issue a Citation against Windsor. Having been issued a Citation, Windsor was immediately transformed into a "defendant" rather than the innocent victim. This was maddening.

20. Boise Cascade had its vehicle towed away from the scene of the accident. Windsor examined the vehicle at the scene, and he did not see any damage that would require a tow truck. Windsor believes this was part of the Defendants' game plan to deceive Linzmayer and the Courts to outrageously claim Windsor was at fault.

21. Linzmayer told Windsor he would contact 911 callers to see if anyone could confirm Windsor's account of the accident. Linzmayer said he would withdraw the Citation if that happened. Linzmayer subsequently spoke with eyewitness Wilt who told Linzmayer that the Boise Cascade vehicle caused the accident. Linzmayer did nothing in response. Windsor spoke with eyewitness Carrie Broussard who said that she saw Windsor's vehicle spinning counter-clockwise. Linzmayer falsely claimed it was spinning clockwise because that fit his fabrication.

22. On August 8, 2017, Windsor, Longest, and Linzmayer appeared before Judge Elizabeth J. Starr in the County Court of the Ninth Judicial Circuit, Case Number 2017-TR-014035-A-W. Linzmayer testified that he did not witness the accident. Longest testified that he

felt something, but never saw Windsor's vehicle. He said he then saw Windsor's vehicle spinning out of control in his rearview mirror. He claimed there was damage to the left front of his truck. Longest testified that he didn't see Windsor's vehicle heading toward him on the Florida Turnpike. Longest testified that he didn't know for sure what happened. Longest admitted that it was possible that he was in the third lane from the right shoulder where Windsor has said he was. Windsor asked Longest if he saw Linzmayer's accident report that showed Windsor's vehicle was traveling Northbound in the Southbound lane. Longest had no explanation for how Linzmayer's version could be accurate since he testified he never saw Windsor's vehicle except in his rearview mirror. Linzmayer testified Windsor told him he didn't know what happened. This is absolutely false. Judge Elizabeth J. Starr rolled her eyes at Linzmayer's claim of the accident. She said there was no evidence Windsor had done anything careless, and she dismissed the case.

23. By giving false information to Trooper Linzmayer, the Defendants put Windsor in a defensive posture when he was the victim. This forced Windsor to spend time and money that should have never been required. This caused the Defendants' insurance carrier to deny liability. This placed Windsor at risk for being found guilty and having a moving violation on his driving record and four points. This lie was used to deny Windsor's insurance company recovery from the Defendants for the car that was totaled. This was used to deny liability in discovery responses. By giving false information to Trooper Linzmayer and denying liability, the Defendants caused Windsor's insurance cost to increase. For 2017, Windsor's auto premium was \$872. This has increased to \$2,383.76. This was extreme and outrageous conduct. Longest's specific behavior was intentional.

24. Since the accident on May 5, 2017, the Defendants have refused to admit liability for the accident. The Defendants have caused severe emotional distress with their lies, false information, violation of the Rules, perjury, and malicious motions.

25. On January 26, 2018, Boise Cascade made a demand on Progressive Insurance for \$3,593.17. Boise Cascade said: "Our investigation indicates that your insured was responsible for the accident on May 5, 2017." The letter referred to the Citation. Boise Cascade's so-called "investigation" ignored that Judge Starr dismissed the Citation saying there was no evidence that Windsor had done anything wrong. The so-called "investigation" also ignored that Longest has testified that Windsor did not hit the left front of the truck. Windsor testified that Longest came into his lane and broadsided his vehicle. This demand letter is attempted fraud. It is outrageous, fraudulent, deceitful, and intentional infliction of emotional distress. Boise Cascade's specific behavior was intentional.

26. On November 16, 2018, Longest served his Verified Response to Plaintiff's Interrogatories. Longest provided a false answer to Interrogatory Number 6: "Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question." Longest swore that "Plaintiff contributed to the incident alleged in Plaintiff's Complaint by failing to observe traffic rules and/or failing to observe traffic rules and/or failing to take all reasonable steps to avoid the incident." 15 months prior to this, on August 8, 2017, Longest testified in Case Number 2017-TR-014035-A-W in the County Court of the Ninth Judicial District that he only saw the Plaintiff's vehicle spinning out of control in his rearview mirror after he felt an impact on his vehicle. On May 5, 2017, eyewitness Wilt saw the accident and called 911. On August 8, 2017, Windsor testified that Longest came into his lane and broadsided Windsor's vehicle. On March

7, 2018, Wilt swore under oath that Longest came into Windsor's lane and hit his vehicle. He swore: "The semi truck caused the accident." On April 8, 2019, Windsor swore under oath at a deposition that Longest and the Boise Cascade truck came into his lane and hit his vehicle. Longest committed perjury.

27. In the November 16, 2018 responses to Request for Admissions, Boise Cascade and Longest denied that Longest was negligent in the operation of a motor vehicle which resulted in the subject collision with Plaintiff's vehicle. In the November 16, 2018 response to Request for Admissions, Boise Cascade and Longest outrageously denied that Windsor was injured in the accident. Boise Cascade and Longest outrageously denied that Windsor was not guilty of negligence which caused or contributed to the accident. Boise Cascade and Longest outrageously denied that Windsor incurred medical expenses for treatment of injuries resulting from the subject accident. Boise Cascade and Longest recklessly claimed Windsor's medical expenses were not reasonable and necessary for the care and treatment of the injuries sustained in the subject accident.

28. On November 16, 2018, Boise Cascade produced documents and invoices claiming damage was caused to the left front of the Boise Cascade vehicle. This is outrageous as Longest swore on August 8, 2017 that he never saw Windsor's vehicle ahead of his vehicle and that he only saw it in his rearview mirror after he felt an impact.

29. Windsor's life was severely damaged at 2:35 pm on May 5, 2017 when this accident took place. Windsor could have been killed.

30. Longest and Boise Cascade were negligent, and their behavior since the accident has been outrageous.

31. On July 7, 2020, this Court ordered Boise Cascade to amend its answer to Interrogatory No. 8. On July 27, 2020, Boise Cascade filed a document that purported to be an amendment, but it did not provide the information this Court specified, and it was not verified. On August 4, 2020, Windsor was forced to file a Motion to find Boise Cascade in Contempt. This is part of the intentional infliction of emotional distress.

32. On July 20, 2020, the Defendants filed a Motion to determine Windsor's Competency to represent himself. There is no legal authority for this, and it is part of the intentional infliction of emotional distress. The Defendants filed documents that are CONFIDENTIAL and were presented solely for settlement purposes. This most definitely inflicted emotional distress.

33. On July 27, 2020, the Defendants filed a Motion to Dismiss this case. There is no legal authority for this, and it is part of the intentional infliction of emotional distress.

34. The attorney for the Defendants has violated at least 16 provisions of the Florida Rules of Professional Conduct. This is very much a part of the intentional infliction of emotional distress.

35. Windsor was a healthy, active, young 68-year-old man before he was hit. Now he is a disabled, second floor condo-confined, old 71-year-old victim. Windsor had no history of back or neck problems. There is no family history of back or neck problems.

36. Now Windsor can barely walk and needs cane or walker.

37. Windsor can no longer travel. He lives in a second-floor condo, and the stairs are a nightmare. Carrying one or more bags of groceries up the stairs is torture. Windsor has been issued a handicapped parking tag by the State of Florida, but it is painful to walk even a few feet. Windsor's back feels like it has simply given out. It has gotten progressively worse over time.

38. Windsor feels like an invalid, and the Defendant's have inflicted extreme emotional distress.

39. Windsor has seen a host of doctors and has had many X-rays, CT scans, and echocardiograms, as well as five MRIs.

40. Windsor now has a permanent disability with his neck. His cervical rotation is now 45-degrees to the left and 42-degrees to the right. Normal is 80-degrees.

41. Windsor is severely claustrophobic, so he refused to take an MRI in 2017 or early 2018. On June 7, 2018, he finally had an MRI at Clermont Radiology. The MRI showed divarication of the abdominis recti (also known as Diastasis Recti) and bulging of the intra-abdominal contents. There is a 4.5-inch separation of the muscles that are supposed to keep the abdominal contents contained. Dr. Chintan DeSai stated that it is "medically probable that the discussed findings were caused by recent accident 5/5/2017."

42. From previous consultations with Dr. Eduardo Parra Davila and Dr. Owen Fraser, divarication of the abdominis recti and bulging of the intra-abdominal contents is not something they can use surgery to repair. Windsor will have to receive medical care in this regard for the rest of his life.

43. After the back pain increased, Dr. Alan Newman sent Windsor for two MRIs. They show all kinds of injuries.

44. On March 11, 2020, Windsor saw Dr. Roderick Claybrooks at BioSpine. He says Windsor needs Lumbar Fusion – two rods and four bolts. He says the lowest of Windsor's discs needs to be removed. He wanted to do the surgery right away, but since Windsor has terminated Dan Newlin as his attorney, BioSpine can't move forward with surgery as they have no



assurance of payment. The cost of the surgery recommended by BioSpine has been estimated at \$60,000 to \$100,000 with two days of hospitalization.

45. Windsor saw Michael LaFleur and Dr. Nizam Razaek of Spine and Brain Neurosurgery Center in Orlando on April 10, 2020. Windsor was sent for two more MRIs and four X-rays. Michael LaFleur showed Windsor the March 20, 2019 MRI and said that it does not show a degenerative condition apart from what the accident caused.

46. On April 23, 2020, Windsor had two MRIs and four X-Rays at CareFirst Imaging in Ocala. Four herniated discs were noted in the MRI of the Lumbar Spine (T12-L1, L2-L3, L3-L4, and L4-L5). Disc bulges were also noted in L1-L2 and L3-L4. There were three new findings: "L3-L4: Posterior diffuse disc bulge with superimposed posterior central disc herniation." "T12-L1: Left paracentral focal disc protrusion/herniation...." "On comparison with prior study dated 3/20/2019, there is interval development of posterior central disc herniation at L3-L4."

47. Five herniated discs were noted in the MRI of the Cervical Spine (C2-C3, C3-C4, C4-C5, C5-C6, and C6-C7). Disc bulges were also noted in C6-C7 and C7-T1. Issues with the spinal cord are noted three times. There were four new findings: "Straightening of cervical lordosis." "C5-C6: Broad based posterior disc herniation with uncovertebral hypertrophic changes abutting the spinal cord." "C6-C7: Posterior central focal disc herniation...diffuse disc bulge abutting the spinal cord." "On comparison with prior study dated 3/20/2019, there is interval reduction in severity of posterior disc herniation at C2-C3. There is interval development of focal posterior central disc herniation at C6-C7."

48. An impression of the X-Ray of the Spine is "On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in

severity of anterior listhesis at L5-S1, retrolisthesis at L1-L2 and development of minimal retrolisthesis at L2-L3, L3-L4 and L4-L5."

49. The impression of the X-Ray Cervical Spine Flex/Ext is: "Moderate cervical spondylosis at C5-C6" and "Instability at C2-C3, C3-C4, and C4-C5 on flexion and extension views."

50. The impression of the X-Ray L-Spine Flex/Ext is: "Exaggerated lumbar lordosis." "Moderate lumbar spondylosis." "On comparison with prior study dated 10/1/2019, there is interval worsening in severity of spondylosis changes, increase in severity of anterior listhesis at L5-S1, retrolisthesis at L1-L2 and development of minimal retrolisthesis at L2-L3, L3-L4 and L4-L5."

51. Dr. Razack and Michael LaFleur say Dr. Razack cannot operate on Windsor's spine because of the Diastasis Recti. Dr. Parra Davila and Dr. Fraser say the Diastasis Recti is inoperable. The Diastasis Recti has caused Windsor to wet his pants daily. This inflicts emotional distress throughout every day.

52. Longest and Boise Cascade have caused terrible pain and suffering to Windsor. Windsor is now disabled as the result of the accident. Windsor's condition has deteriorated since he was broadsided. Windsor has been miserable. Windsor can't do much of anything. Windsor doesn't see anyone. Windsor has three granddaughters who he loves more than anything, and he is now unable to go see them. Windsor's youngest granddaughter is a tiny four-year-old, and he is unable to hold her. Windsor doesn't do anything but essential trips for medical matters, pharmacy, and groceries. He expects to lose the ability to shop at a grocery store. Windsor's life has become sitting in a special chair and watching TV. He can't enjoy life. The last three years

has been horrible, and the thought of another 20 years of this is unbearable. Longest and Boise Cascade continue to maintain their lies. This is intentional infliction of emotional distress.

53. The Defendants continue to pretend they were not at fault. The attorney for the Defendants pretended to be interested in settlement, but it was nothing more than another lie and a delaying tactic.

54. The conduct of Longest and Boise Cascade was intentional and reckless; the conduct was outrageous; the conduct caused emotional distress; and the emotional distress was severe.

**COUNT I - ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT.**

**ROBERT KEITH LONGEST**

55. Windsor adopts and realleges Paragraphs 1 through 54 as fully set forth herein.

56. Longest was negligent and careless in the operation of his motor vehicle so as to collide with the motor vehicle driven by Windsor.

57. As a direct and proximate cause of Longest's negligence, Windsor, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
- C. Aggravation or activation of an existing disease or physical defect;
- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;
- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

58. Windsor, will suffer or incur the injuries, expenses and impairment in the future.

WHEREFORE, Plaintiff, William M. Windsor, demands judgment for damages.

against Defendant, Robert Keith Longest, for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT II – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT, ROBERT KEITH LONGEST**

59. Windsor adopts and realleges Paragraphs 1 through 54 as fully set forth herein.

60. Longest has intentionally and recklessly inflicted emotional distress on Windsor.

Longest's conduct has been outrageous. Longest's conduct has caused and continues to cause emotional distress to Windsor. The emotional distress has been and is severe.

**WHEREFORE**, Plaintiff, William M. Windsor, demands judgment for damages against Defendant, Robert Keith Longest, for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT III – ACTION BY PLAINTIFF FOR NEGLIGENCE AGAINST DEFENDANT BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**

61. Windsor, adopts and realleges Paragraphs 1 through 54 as fully set forth herein.

62. Boise Cascade is vicariously liable for the negligence of Longest, pursuant to Florida's Dangerous Instrumentality Doctrine.

63. As a direct and proximate cause of Defendants' negligence, Windsor, suffered or incurred injuries including, without limitation, the following:

- A. Significant and permanent loss of an important bodily function and/or permanent and significant scarring.
- B. Permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
- C. Aggravation or activation of an existing disease or physical defect;

- D. Pain, suffering, disability, physical impairment, mental anguish, inconvenience, and a loss of capacity for the enjoyment of life;
- E. Expenses of medical care and treatment in the past and in the future;
- F. Loss of wages and/or loss of earning capacity in the future; and
- G. All losses are continuing and/or permanent.

64. Windsor, will suffer or incur the injuries, expenses, and impairment in the future.

**WHEREFORE**, Plaintiff, William M. Windsor, demands judgment for damages against Defendant, Boise Cascade Building Materials Distribution, L.L.C., for personal injury including the losses enumerated herein, costs, interest and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**COUNT IV – ACTION BY PLAINTIFF FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST DEFENDANT BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C.**

65. Windsor adopts and realleges Paragraphs 1 through 54 as fully set forth herein.

66. Defendant Boise Cascade is vicariously liable for the negligence of Longest, pursuant to Florida's Dangerous Instrumentality Doctrine.

67. Boise Cascade has intentionally and recklessly inflicted emotional distress on Windsor. Boise Cascade's conduct has been outrageous. Boise Cascade's conduct has caused and continues to cause emotional distress to Windsor. The emotional distress has been and is severe.

68. Plaintiff, William M. Windsor, will suffer or incur the injuries in the future.

**WHEREFORE**, Plaintiff, William M. Windsor, demands judgment for damages against Defendant, Boise Cascade Building Materials Distribution, L.L.C., for intentional infliction of emotional distress and for other such relief as may be just and equitable and otherwise deemed proper by the Court.

**DEMAND FOR JURY TRIAL**

Plaintiff, William M. Windsor, demands a jury trial on all issues so triable of each and every one of the Counts set forth above.

**RESPECTFULLY** submitted and DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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**William M. Windsor**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Electronic Mail

to:

David I. Wynne  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559  
813-218-3110  
Fax: 813-649-8362

This \_\_\_\_\_ day of \_\_\_\_\_, 2020.

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**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billWindsor.com - billWindsor1@outlook.com

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 2018-CA-010270-Q

WILLIAM WINDSOR

Plaintiff(s)

vs.

ROBERT KEITH LONGEST

Defendant(s)

**OMNIBUS ORDER ON MULTIPLE MOTIONS**

Plaintiff addressed two letters to the Court dated August 25, and August 29, 2020, which listed multiple hearings on motions that he has filed and now asks that they be set for hearings.

Many matters can be addressed without hearings and most do not require an evidentiary hearing.

The Court will address those mentioned in the correspondence and that remain outstanding.

Plaintiff's Third Amended Motion for Leave to File an Amended Complaint dated

August 19, 2020. This motion is GRANTED and is deemed filed as of the date of this order.

The defendant shall respond within 20 days. As this is the "third" amended complaint on a case

that is over two years old, this will be last time the complaint may be amended without showing

good cause.

The Court has recently taken over this case, as the prior judge has recused herself. The *pro se* plaintiff is a prolific filer of motions. Many are repetitive, not based on statutory or Florida case law, and some are not legally sufficient. Others are improperly titled, but are treated by the Court as if they are proper in light of his *pro se* status. In many instances the Plaintiff is filing three to five motions each day on consecutive days. For example in the last two months (August and September) the Plaintiff has filed 54 motions and other filings with the Court. The volume of filings is affecting the efficient administration of justice and preventing this Court from addressing other pending cases.

**EXHIBIT F**

Defendant's Motion as to Competency determination, and Plaintiff's ability to proceed pro se, and requirement that defense counsel adhere to the Florida Bar Rules. This motion has already been heard and an ORDER was ENTERED on October 1, 2020.

Plaintiff's Motion to Strike and Motion for Sanctions on Defendant's Motion to Dismiss filed on 8/25/2020 is DENIED; a hearing is not necessary.

Plaintiff's Motion to Strike Confidential Information and Motion for Sanctions filed on 8/4/20 is DENIED; a hearing is not necessary.

Plaintiff's Motion to Find Defendant BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C. IN CONTEMPT was filed on 8/4/2020. The motion is DENIED; a hearing was not necessary.

Plaintiff's Motion to Compel Defendant Longest to Produce Documents pursuant to Fla. R. Civ. P. §1 380 was filed on 8/4/20. A hearing is unnecessary. The Court reviewed the each of the Requests to Produce and the responses and objections thereto. The Objections are sustained, and the Motion to Compel is DENIED.

Plaintiff's Motion to Compel Defendant Boise Cascade to Produce Documents and for Sanctions was filed on 8/4/20. A hearing is unnecessary. The Court reviewed the each of the Requests to Produce and the responses and objections thereto. The Objections are sustained, and the Motion to Compel and for Sanctions is DENIED.

Plaintiff's Motion to Compel Depositions was filed on 8/4/2020. Plaintiff represents that he has attempted to coordinate deposition dates with defense counsel of certain employees. These employees are: Wayne Lester, Chris Johnson, Chris Mello, Scott Astrin and David I. Wynne. Plaintiff has a right to depose these witnesses. For those who are still employees of the Defendant's company, counsel for the defendant should make them available. For those who are



no longer employees, counsel is not obligated to make them available, but must disclose their last known address for service of subpoenas. Each deposition may last no longer than one (1) hour. Depositions must be taken remotely pursuant to the Florida Supreme Court Administrative Orders unless the courts have moved to Phase IV wherein in person appearances would be permitted. For witnesses who will not be voluntarily produced, the plaintiff will have to work with the clerk of court to obtain subpoenas and serve the witnesses. Counsel should confer and coordinate the times for the depositions. A reasonable time to schedule a deposition would be within four weeks of the request. Should counsel and *pro se* not agree on dates, the parties should appear in front of the Court at *ex parte* hearing within 3 or 4 days of the impasse and the Court will set the date, without consideration of either parties calendars or conflicts. Therefore, the motion to compel is GRANTED.

Plaintiff's Motion to Compel Subpoena for Documents from Dr. Stephen Goll, pursuant to Fla. R. Civ. P. 1.351 was filed on 8/4/2020. Dr. Goll is a medical doctor who apparently did not provide treatment for this accident. The Court presumes he performed an examination pursuant to Fla. R. Civ. P. 1.360 known as a compulsory medical evaluation. Pursuant to the rule, the party who was examined is entitled to a copy of report that was made by the doctor. The party examined also may take the deposition of the doctor, but as an expert witness, the examining doctor would be entitled to a reasonable fee for his time, Fla. R. Civ. P. 1.390. The rule does not require anything other than the report and test results to be produced. Notes in the doctors file would not be discoverable unless the doctor relied on those notes in formulating his opinion. Further, items provided to the examining physician may, or may not, be discoverable as they may be work product. Lastly, if there is an objection to production under rule 1.351,

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\* AOSC20-23, Amendment 6 as well has footnotes 1 & 2

generally discovery must be made by deposition pursuant to 1.350. Therefore, without more information, the Court is not able to compel a non-party who is, in this case a non-party pursuant to Rule 1.360, to comply with a request under Rule 1.351. Therefore, the Motion is DENIED.

Plaintiff's Motion for Reconsideration of Order on Motion for Sanctions against Defendant Boise Cascade Building Materials, L.L.C. for Fraud on the Court was filed 8/24/2020. This Court has reviewed the motion referred to herein. It has reviewed the court file, the filings and responses, as well as the case law. Having considered all the matters, this Court adopts the prior findings and finds no basis to change the Court's rulings. The Court further finds, assuming the Plaintiff's representations are accurate, that the motion does not state a sufficient basis to warrant an evidentiary hearing. The motion is DENIED.

Plaintiff's Motion for Reconsideration of Order on Motion for Sanctions against Defendant Robert Keith Longest for Fraud on the Court was filed 8/24/2020. This Court has reviewed the motion referred to herein. It has reviewed the court file, the filings and responses, as well as the case law. Having considered all the matters, this Court adopts the prior findings and finds no basis to change the Court's rulings. The Court further finds, assuming the Plaintiff's representations are accurate, that the motion does not state a sufficient basis to warrant an evidentiary hearing. The motion is DENIED.

Plaintiff's Objections (sic) to Robert Keith Longest's Answers to Interrogatories and Motion for Sanctions against Defendant Robert Keith Longest was filed on 6/24/2020. The Court has reviewed the interrogatories and the responses thereto as well as the objections. The objections, set forth by the defendants, are SUSTAINED. The answers to the interrogatories appear to reasonably respond to the questions posed. While the Court understands that the Plaintiff is *pro se*, he is bound by the rules of procedure and the evidence code. The plaintiff is

attempting to utilize the Florida Rules of Civil Procedure in a manner that would not be countenanced by a court when asserted by an attorney. His citation to rule sections and provisions suggest he has read the rules and should be familiar with them. Since this motion, or "Objections," as noted by the Plaintiff, are inappropriate and unsupported, the Court finds that they have not been made in good faith, finds that plaintiff has violated the rules, and should be assessed attorney's fees and costs under *Fla. R. Civ. P.* 1.380. Therefore, the "Objections" asserted by the plaintiff are **OVERRULED**, the Motion for Sanctions requested by the plaintiff is **DENIED**. Sanctions are appropriate to be imposed upon the plaintiff under *Fla. R. Civ. P.* 51.380. The amount will be determined at a separate evidentiary hearing.

Plaintiff's Objections (sic) to Boise Cascade's Answers to Interrogatories and Motion for Sanctions against Defendant Boise Cascade filed on 6/24/2020. The Court has reviewed the interrogatories and the responses thereto as well as the objections lodged by the Defendants. Most objections are **SUSTAINED** and the vast majority of the responses are responsive. However, as to interrogatory #15, the objections is **OVERRULED**; the response following indicating "none" will be considered the answer. This interrogatory was presented to Boise, and is not subject to an objection by Longest. Interrogatory #24 was answered by a reference to a document, but plaintiff indicated that the document was not produced. The **DOCUMENT MUST BE PRODUCED** to be responsive. All other asserted objections by defendant are sustained. The Plaintiff "Objections" are **OVERRULED** except as hereinbefore noted.

Plaintiff's Motion to Determine the Sufficiency of the Answers to Requests for Admissions to Defendant Robert Keith Longest was filed 6/24/2020. The Court has reviewed the motion, the request for admissions #13, 16, 17, 18, 19, & 20, the ones challenged by the Plaintiff. The plaintiff has asserted no valid legal basis to object to the responses to these

requests for admission. The fact that the plaintiff disagrees with them, considers them incorrect, or even fraudulent, is not a legal basis to bring this matter before the Court. The Plaintiff, albeit *pro se*, is using the rules of procedure as a weapon, and cannot then seek protection from sanctions claiming he is a *pro se* litigant and not a lawyer. The Court and opposing counsel has had to consider these motions to determine the sufficiency of these responses. Therefore, the Motion to Determine Sufficiency of the Answers is DENIED as the answers are deemed responsive. The Court finds there was not a valid basis to assert this motion, and the attorney's fees may be appropriate which will be addressed at a subsequent time.

Plaintiff's Motion to Determine the Sufficiency of the Answers to Requests for Admissions to Defendant Boise Cascade was filed 6/24/2020. The motion is almost identical to the above motion as to Robert Keith Longest. The Court has reviewed the motion, the request for admissions #13, 16, 17, 18, 19, & 20, the ones challenged by the Plaintiff. These are the same requested admissions as the ones challenged regarding Longest. The plaintiff has asserted no valid legal basis to object to the responses to these requests for admission. The fact that the plaintiff disagrees with them, considers them incorrect or even fraudulent is not a legal basis to bring this matter before the court. The Plaintiff, albeit a *pro se*, is using the rules of procedure as a weapon and cannot then seek protection from sanctions claiming he is a *pro se* litigant and not a lawyer. The Court and opposing counsel has had to consider these Motions to Determine the Sufficiency of these responses. Therefore, the Motion to Determine Sufficiency of the Answers is DENIED as the answers are deemed responsive. The Court finds there was not a valid basis to assert this motion, and the attorney's fees may be appropriate which will be addressed at a subsequent time.

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\*In fact, this Court is expending hours on these motions in light of the two letters noted in the introductory paragraph, requesting that these matters be ruled upon by the Court.

Plaintiff's Motion for Sanctions to Strike the Answer of Boise Cascade Building Materials Distribution, L.L.C.; Motion for Sanctions to Strike the Answer of Defendant Robert Keith Longest; Motion for Fraud on the Court; Motion for Sanctions for Violations of the Rules and Motion for Evidentiary Hearing were filed on 8/29/2020.<sup>4</sup> The filing is 101 pages in length. It accuses the parties, and the attorneys, of lying without any proof thereof. It alleges ethical violations against opposing counsel, and it asserts that if the plaintiff believes a matter is true, it must be, and everybody else is intentionally misrepresenting themselves to the Court. It alleges, amongst many other things that by filing an answer to the complaint denying allegations, the parties and their counsel are committing fraud upon the Court. A reading of the Motion coupled with the case law, demonstrates that motion is legally insufficient. There is no legal basis to Strike the Answer of Boise Cascade or of Robert Keith Longest. There is no basis to hold a hearing on a Motion for Fraud on the Court as the facts, even if true, could not establish fraud. There is no basis for the Court to sanction opposing counsel for violations of the 13 subsections of the Rules Regulating the Florida Bar, the four Rules of Civil Procedure, the two Rules of Judicial Administration, nor the criminal statute cited.<sup>5</sup> Accordingly, the Court finds that evidentiary hearings are NOT WARRANTED, the Motion for Sanctions to Strike the Answer of Boise Cascade Building Materials Distribution, L.L.C. and of Robert Keith Longest are DENIED, the Motion for Fraud on the Court are DENIED, and the Motion for Sanctions for Violation of the Rules is DENIED. The Court reserves on the appropriateness of imposition of fees under both the discovery rules and *Fla. Stat. §57.105*.

<sup>4</sup> These were two separate motions filed on the same date, and while combined in this order, they have been reviewed separately.

<sup>5</sup> The plaintiff suggests that he would need 4 to 8 hours to have his motions for fraud heard. Letter from Plaintiff Aug. 29, 2020.

Plaintiff's Request for Findings of Fact and Conclusions of Law on Order Denying

Motion to Exceed 30 Interrogatories and 30 Requests for Admission was filed 8/22/2020. This issue is MOOT and, therefore, will not be addressed, as the judge that entered the referenced order has moved off this case. The orders have been entered and stand as they were entered.

Plaintiff's Request for Findings of Fact and Conclusions of Law on various orders was filed on both 8/19/2020 and 8/22/2020. The requests are DENIED. This Court reviews all submittals and conducts hearings where necessary. In certain matters, the Court will draft a detailed order such as after a non-jury trial or a complicated evidentiary hearing. Many times the Court will announce its ruling, the reasons therefore, on the record. In most matters, the Court does not have the resources nor time to draft detailed written orders on every motion. If the Court were to attempt to issue a written order on each case, the docket would come to halt.

DONE AND ORDERED on this 20th day of October, 2020.



John Marshall Kent  
Circuit Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 20th day of October, 2020 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the

<sup>1</sup> For the edification of the pro se litigant in this case, while each case is important to the Court, Division 37 has 8228 case on its civil docket of which this case is but one.

of Part System

*Dan L. ...*

Judicial Assistant to Judge John Marshall Keiser

# EXHIBIT

# C



IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs.

Case No.: 2018-CA-010270-O

ROBERT KEITH LONGEST, an individual,  
and BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C., a  
Foreign Limited Liability Company,

Defendants.

**STIPULATION FOR SUBSTITUTION OF COUNSEL**

IT IS HEREBY STIPULATED AND AGREED that David I. Wynne, Jr., Esquire, is hereby substituted as counsel for the Defendants, ROBERT KEITH LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., and that William Hyland, Esquire hereby withdraws as counsel for said Defendants.

DATED this 10th day of May, 2019.

<p><i>William Hyland</i></p> <hr/> <p>William Hyland, Esquire Vernis &amp; Bowling of Central Florida, P.A. 1450 S. Woodland Boulevard, 4th Floor DeLand, FL 32720 Phone: 386-734-2505 Bar No.: 402265</p>	<p><i>David I. Wynne, Jr.</i></p> <p>David I. Wynne, Jr., Esquire Law Offices of Scott L. Astrin 100 N. Tampa Street, Suite 2605 Tampa, FL 33602 Phone: 813-218-3118 Bar No.: 326290</p>
--	--

IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs.

Case No.: 2018-CA-010270-O

ROBERT KEITH LONGEST, an individual,  
And BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C, a  
Foreign Limited Liability Company,

Defendants.

---

**AGREED MOTION FOR CONTINUANCE**

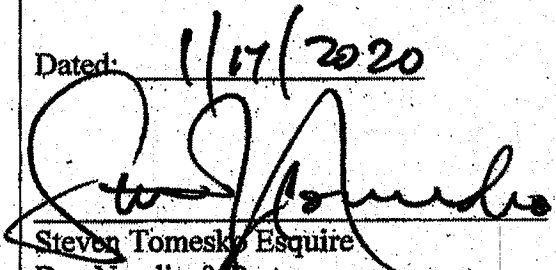
Plaintiff, WILLIAM WINDSOR, and Defendants, ROBERT KEITH LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, LLC ("the parties"), by and through their undersigned counsels, and in accordance with the Florida Rules of Civil Procedure, hereby respectfully move for a continuance of the jury trial in this case, which is currently scheduled for the two week trial docket commencing March 23, 2020, and as grounds therefore state:

1. The parties mutually desire to schedule a new mediation at the next available date to achieve a global resolution, as an alternative to the ongoing litigation and approaching jury trial. An initial mediation was attempted unsuccessfully, but circumstances have led the parties to a posture where all sides now anticipate a productive session. However, due to the schedules of the multiple parties, attorneys, and representatives, the next available date for mediation will not be feasible in light of the current trial date. Moreover, the parties agree that mediation will be more successful if the pretrial deadlines and litigation that occur close to trial are removed by a continuance.

2. Furthermore, a Compulsory Medical Exam was scheduled for Plaintiff on December 11, 2019. However, a conflict arose for Plaintiff shortly before that date, and he was unable to attend. To allow additional time for rescheduling and completion, the parties desire a trial continuance.

3. No previous continuances have occurred in this cause, and the parties mutually acknowledge that a continuance would result in no prejudice of any kind to Plaintiff or Defendants.

4. The parties, via their undersigned counsel, certify that the present motion brought in good faith, and not for the purpose of delay.

<p>Dated: <u>1/17/2020</u></p>  <p>Steven Tomesko Esquire Dan Newlin &amp; Partners Attorneys for Plaintiff 7335 W. Sand Lake Road, Suite 300 Orlando, FL 32819 Phone 407 203-6580 Bar #: 0098310</p>	<p>Dated: <u>12/17/2019</u></p> <p><u>David I. Wynne, Jr.</u> David I. Wynne, Jr., Esquire Law Offices of Scott L. Astrin Staff Attorneys for AIG Attorney for Defendants 100 N. Tampa Street, Suite 2605 Tampa, FL 33602 Phone: 813-218-3118 Bar #: 00326290</p>
--	---

CLAIM NO:  
0516540545US  
ORDER #:FL0153856

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE, FLORIDA  
CIVIL DIVISION

WILLIAM WINDSOR

CASE NO. 2018-CA-010270-O

Plaintiff(s),

vs.

ROBERT KEITH LONGEST, AN  
INDIVIDUAL, AND BOISE CASCADE  
BUILDING MATERIALS DISTRIBUTION,  
L.L.C, A FOREIGN LIMITED LIABILITY  
COMPANY,

Defendant(s),

---

**DEFENDANT(S) NOTICE OF PRODUCTION OF DOCUMENTS**  
**FROM NON-PARTY**

YOU ARE HEREBY NOTIFIED that after ten (10) days from the date of service of this Notice, service is by email, and if no objection is received from any party, the undersigned will issue or apply to the Clerk of this court for the issuance of the attached Subpoena(s) directed to the following:

Radiology Records Custodian for  
FLORIDA HOSPITAL WATERMAN - FILMS  
1000 WATERMAN WAY  
TAVARES, FL 32778

Radiology Records Custodian for  
RADIOLOGY SPECIALISTS OF FLORIDA  
2600 WESTHALL LANE  
MAITLAND, FL 32751

Radiology Records Custodian for  
CENTRAL FLORIDA MEDICAL & CHIROPRACTIC CENTER  
1561 WEST FAIRBANKS AVENUE, SUITE 300  
WINTER PARK, FL 32789

CLAIM NO:  
0516540545US  
ORDER #FL0153856

Radiology Records Custodian for  
CLERMONT RADIOLOGY  
871 OAKLEY SEAVER DRIVE  
CLERMONT, FL 34711

Radiology Records Custodian for  
FLORIDA MRI CENTER  
1561 WEST FAIRBANKS AVE, SUITE 300  
WINTER PARK, FL 32789

Radiology Records Custodian for  
CENTRAL FLORIDA HEALTHCARE  
916 DUNDEE ROAD  
DUNDEE, FL 33838

Radiology Records Custodian for  
MEDICAL INJURY CARE P.N.  
1805 WEST COLONIAL DRIVE, SUITE A  
ORLANDO, FL 32804

The above listed are not a party to this lawsuit and are requested to produce the items listed at the time and place specified in the attached Subpoena(s).

If you wish to receive copies of these documents, please advise the undersigned, in writing, and same will be provided, at a cost for photocopies, upon receipt.

IF COPY CHARGES EXCEED \$250.00 FOR THIS PATIENT, PLEASE CONTACT COMPEX LEGAL SERVICES, INC. AT 888-531-2919 WITH A LIST OF THE CHARGES INVOLVED IN OBTAINING THESE RECORDS BEFORE CREATING COPIES.

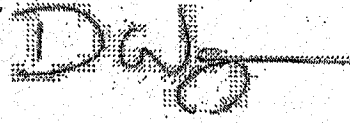
PLEASE BE GOVERNED ACCORDINGLY.

I HEREBY CERTIFY that on the 27 day of March, 20 20 a true and correct copy of the foregoing Defendant(s) Notice of Production of Documents from Non Party has been furnished by email to:

WILLIAM WINDSOR (PRO SE)  
WILLIAM WINDSOR  
P.O. BOX 491078  
LEESBURG, FL 34749

CLAIM NO:  
0516540545US  
ORDER #FL0153856

LAW OFFICE OF SCOTT L. ASTRIN  
100 NORTH TAMPA STREET, SUITE 2605  
TAMPA, FL 33602  
Telephone: 813-218-3058  
Fax: 813-649-8362



By: \_\_\_\_\_

DAVID I. WYNNE, JR., ESQ.  
FL BAR NO. 326290  
PRINCIPAL EMAIL FOR SERVICE OF PLEADINGS:  
DAVID.WYNNE@AIG.COM  
Attorney for Defendant(s)  
ROBERT KEITH LONGEST AND BOISE CASCADE  
BUILDING MATERIALS DISTRIBUTION

IN THE CIRCUIT COURT OF  
NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY  
FLORIDA CIVIL DIVISION

WILLIAM WINDSOR

Plaintiff(s),

CASE NO. 2018-CA-010270-O

vs.

ROBERT KEITH LONGEST, AN INDIVIDUAL,  
AND BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C, A  
FOREIGN LIMITED LIABILITY COMPANY,

Defendant(s),

---

**CERTIFICATE OF NON OBJECTION TO SUBPOENA(S)**

I HEREBY CERTIFY that no objections to production under Rule 1.351, Florida Rules of Civil Procedure, have been received by the undersigned with ten (10) days of service by email of the Notice of Production from Non-Party, a copy of which is attached.

I HEREBY CERTIFY that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ a true and correct copy of the foregoing Certificate of Non Objection to Subpoena(s) has been furnished by email to:

FILE NO.: FLTA01803  
ORDER #: FL0153856  
TOTAL PAGES: 2

WILLIAM WINDSOR (PRO SE)  
WILLIAM WINDSOR  
P.O. BOX 491078  
LEESBURG, FL 34749

LAW OFFICE OF SCOTT L. ASTRIN  
100 NORTH TAMPA STREET, SUITE 2605  
TAMPA, FL 33602  
Telephone: 813-218-3058  
Fax: 813-649-8362

By: 

DAVID L. WYNNE, JR., ESQ.  
FL BAR NO. 326290  
PRINCIPAL EMAIL FOR SERVICE OF PLEADINGS  
DAVID.WYNNE@AIG.COM  
Attorney for Defendant(s)  
ROBERT KEITH LONGEST AND BOISE CASCADE  
BUILDING MATERIALS DISTRIBUTION



# Appendix

## 39

IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs.

Case No.: 2018-CA-010270-O

ROBERT KEITH LONGEST, an individual,  
And BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C, a  
Foreign Limited Liability Company,

Defendants.

---

**MOTION FOR PROTECTIVE ORDER**

COME NOW Defendants, ROBERT KEITH LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., by and through their undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.280(c) hereby respectfully request that this Court grant a protective order prohibiting the depositions of defense counsel David Wynne and Scott Astrin, and as grounds therefore would show:

1. Pro Se Plaintiff has unilaterally scheduled the depositions of defense counsel David Wynne and Scott Astrin, in the above-styled cause for March 29, 2021 and March 31, 2021.
2. The present matter arises from a motor vehicle accident on May 5, 2017.
3. David Wynne and Scott Astrin are employees of AIG and are defense counsel for Defendants in the above-described action. They are not parties in this action or are they factual witnesses with regard to the May 5, 2017 motor vehicle accident.

4. David Wynne and Scott Astrin do not possess any information that is relevant to the issue of liability, causation, or damages, nor do they possess any information that is likely to lead to the discovery of admissible evidence in this case.

5. Further, any information that David Wynne and Scott Astrin do possess regarding this case is protected by the attorney-client and/or work-product privilege or constitutes a trade secret or other confidential information.

WHEREFORE, Defendants respectfully request that this Court grant its Motion for Protective Order prohibiting the deposition of defense counsel David Wynne and Scott Astrin.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 15th day of March, 2021, to: William Windsor, billwindsor1@outlook.com and bill@billwindsor.com (Plaintiff Pro Se).

SI Scott L. Astrin

SCOTT L. ASTRIN  
Florida Bar Number 0084557

SI David I. Wynne, Jr.

DAVID I. WYNNE, JR.  
Florida Bar Number 326290

Law Offices of Scott L. Astrin  
Staff Attorneys for AIG  
100 N. Tampa Street, Suite 2605  
Tampa, FL 33602  
Phone: 813-218-3110  
Fax: 813-649-8362

Primary Email: tampapleadings@aig.com  
Secondary Email: scott.astrin@aig.com;  
anandini.maharaj@aig.com; david.wynne@aig.com  
Attorney for Defendants

# Appendix

## 40

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-0

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**NOTICE OF FILING EXHIBIT B TO AFFIDAVIT OF  
WILLIAM M. WINDSOR DATED MARCH 12, 2021**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff") and files  
this Notice of Filing Exhibit B to Affidavit of William M. Windsor dated March 12, 2021.

These are true and correct copies of all emails sent by William M. Windsor to the Court  
or received from the Court in this case. These will be evidence in response to an Order to Show  
Cause.

This 16th day of March, 2021.



---

**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

Postal Service to:

David I. Wynne and Scott L. Astrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602

david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 16th day of March, 2021.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A - PART 1**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A - PART 2**



IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A – PART 3**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A - PART 4**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-0

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A – PART 5**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

CASE NO. 2018-CA-010270-0

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT A - PART 6**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT B – PART 1**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

CASE NO. 2018-CA-010270-0

---

**VERIFIED AFFIDAVIT OF WILLIAM M. WINDSOR DATED MARCH 12, 2021**

**EXHIBIT B – PART 2**

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**NOTICE OF FILING EXHIBIT A TO AFFIDAVIT OF  
WILLIAM M. WINDSOR DATED MARCH 12, 2021**

COMES NOW the Plaintiff, William M. Windsor ("Windsor" or "Plaintiff") and files  
this Notice of Filing Exhibit A to Affidavit of William M. Windsor dated March 12, 2021.

These are true and correct copies of all emails received by or sent by William M.  
Windsor related to this case. These will be evidence in response to an Order to Show Cause.

This 16th day of March, 2021.



---

William M. Windsor  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com

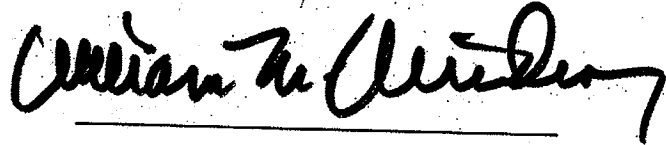
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States

Postal Service to:

David I. Wynne and Scott L. Astrin  
Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605  
Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110  
Fax: 813-649-8362

This 16th day of March, 2021.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com  
billwindsor1@outlook.com



# Appendix

# 41

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR,

CASE NO. 2018-CA-010270-O

Plaintiff,

vs.

ROBERT KEITH LONGEST, an individual, and BOISE CASCADE BUILDING MATERIALS  
DISTRIBUTION, L.L.C., a Foreign Limited Liability Company,

Defendants.

---

**PLAINTIFF'S VERIFIED MOTION TO STRIKE PLEADINGS**  
**AND AWARD SANCTIONS**

COMES NOW, William M. Windsor ("Windsor" or "Plaintiff"), and files Plaintiff's  
Verified Motion to Strike Pleadings and Award Sanctions. Pursuant to Rules 2.515, 2.516, and  
2.520 of the Florida Rules of Judicial Administration; and the Court's Inherent Powers. Windsor  
shows the Court as follows:

1. EXHIBIT A is a spreadsheet created from the Docket showing all filings by the  
DEFENDANTS that were unsigned.
2. A signature is not optional. The signature is much more than a person's name.

Rule 2.515 of the Florida Rules of Judicial Administration dictates the requirement:

"Every document of a party represented by an attorney shall be signed by at least 1  
attorney of record in that attorney's individual name whose current record Florida Bar  
address, telephone number, including area code, primary e-mail address and secondary e-  
mail address, if any, and Florida Bar number shall be stated, and who shall be duly  
licensed to practice law in Florida or who shall have received permission to appear in the  
particular case as provided in rule 2.510. The attorney may be required by the court to  
give the address of, and to vouch for the attorney's authority to represent, the party.  
Except when otherwise specifically provided by an applicable rule or statute, documents  
need not be verified or accompanied by affidavit. The signature of an attorney shall  
constitute a certificate by the attorney that:

"An attorney's signature on any document or paper served on another party establishes that the attorney has read the document and that, to the attorney's knowledge, there are good grounds to support it. See Fla. R. Jud. Admin. 2.515(a)(1), (2). Moreover, a signed certificate of service can have legal significance if questions arise about whether a document was timely served. See, e.g., *JPMorgan Chase Bank, Nat'l Ass'n v. Bigley*, 120 So.3d 1265, 1267 (Fla. 3d DCA 2013) (noting that a signed certificate of service 'creates a rebuttable presumption' that the document was mailed on the date certified (quoting *Migliore v. Migliore*, 717 So.2d 1077, 1079 (Fla. 4th DCA 1998))). Further, **the importance of attorney signatures on documents is underscored by the fact that rule 2.515 contains a sanctions provision that permits unsigned documents to be stricken.** See Fla. R. Jud. Admin. 2.515(a)(4)." (*Valle v. Flory*, 2D16-2848 (Fla.App. Dist.2 08/15/2018).) **[emphasis added.]**

6. Rule 2.516 (f) of the Florida Rules of Judicial Administration requires a signed "Certificate of Service." This Certificate has important legal implications, and it is totally separate and distinct from the requirements of an attorney's signature. Nothing in the Florida Rules of Judicial Administration, the Florida Rules of Civil Procedure, or the Florida Statutes provides that a signature on a certificate of service does anything but provide an attorney certification of compliance with Rule 2.516.

7. This Court must strike the 75 unsigned pleadings.

8. The Plaintiff seeks sanctions for each of the 75 unsigned pleadings. The unsigned pleadings make this a case of simulated litigation rather than real litigation. This has cost the Plaintiff a year of work and at least a year's delay in presenting to a jury. This means years before the Plaintiff may recover the damages necessary for multiple surgeries.

9. The Plaintiff requests a sanction of at least \$1,000 per violation.

#### **PRAYER FOR RELIEF**

Wherefore, the Plaintiff applies to this Court for an order granting this motion; ordering that the 75 pleadings are stricken; ordering that all orders where the stricken pleadings were

considered re void; ordering that the Plaintiff is to be paid a sanction of at least \$1,000 per violation in cash; and grant such other and further relief as is deemed just and proper.

Dated in Leesburg, Florida this 17th day of March, 2021,

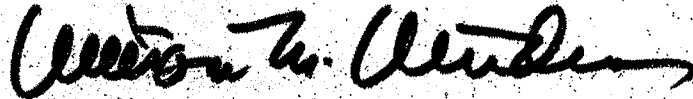


William M. Windsor

**CERTIFICATE OF CONFERENCE**

I HEREBY CERTIFY that I have conferred with the attorneys for the Defendants by email asking if they would oppose this Motion. There was no response.

This 17th day of March, 2021.



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
352-577-9988  
bill@billwindsor.com - billwindsor1@outlook.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Email:

David I. Wynne and Scott L. Astrin -- Law Offices of Scott L. Astrin  
100 N. Tampa Street, Suite 2605, Tampa, Florida 33602  
david.wynne@aig.com, tampapleadings@aig.com,  
emily.christopher@aig.com, scott.astrin@aig.com  
813-526-0559 - 813-218-3110 -- Fax: 813-649-8362

This 17th day of March, 2021.



William M. Windsor

VERIFICATION

The facts alleged in the foregoing are true and correct based upon my personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

This 17th day of March, 2021,



William M. Windsor

# EXHIBIT

# A

Case No.	Party	Category	Sworn Signed	Filing	Date	Legal Auth No.
12	Boise	Notice	No	Notice of Designation of Email Addresses by DEFENDANTS' Attorney	2018-10-10	2 10-2101
13	Boise	Discovery	No	Boise Request for Admissions to Plaintiff	2018-10-10	4 1.370
14	Defendants	Answer	No	Answer	2018-10-10	6
15	Defendants	Discovery	No	Notice of Taking Deposition of William M. Windsor	2018-11-05	2 None
19	Longest	Discovery	No	Longest Notice of Service Answers to Interrogatories	2018-11-16	2 None
20	Boise	Discovery	No	Boise Notice of Service Answers to Interrogatories	2018-11-16	2 None
21	Longest	Discovery	No	Longest Notice of Service Answers to Interrogatories	2018-11-19	2 None
22	Boise	Discovery	No	Motion to Compel Discovery from Windsor	2019-01-24	4 None
23	Longest	Discovery	No	Longest Response to Request to Produce Amended #18	2019-02-04	2 None
25	Defendants	Discovery	No	Notice of Production of Non Party	2019-02-07	18 1.351
26	Defendants	Discovery	No	Notice of Production of Non Party	2019-02-07	18 1.351
27	Defendants	Settlement	No	Notice of Service of Proposal for Settlement	2019-02-11	2 1.442
28	Defendants	Discovery	No	Notice of Production of Non Party	2019-02-13	26 1.351
29	Defendants	Discovery	No	Notice of Production of Non Party	2019-02-21	26 1.351
30	Defendants	Discovery	No	Certificate of No Objection	2019-02-26	1 1.351
31	Defendants	Discovery	No	Certificate of No Objection	2019-02-27	1 1.351
32	Defendants	Discovery	No	Certificate of No Objection	2019-02-28	1 1.351
34	Defendants	Motion - Defendant	No	Objections to Plaintiff's Notice for Jury Trial and Motion for Case Management Conference	2019-03-04	2 None
37	Defendants	Discovery	No	Certificate of No Objection	2019-03-11	1 None
38	Defendants	Discovery	No	Notice of Taking Deposition of William M. Windsor	2019-03-20	2 None
39	Defendants	Discovery	No	Notice of Production of Non Party	2019-04-17	27 None
40	Defendants	Discovery	No	Notice of Production of Non Party	2019-04-23	22 None
42	Defendants	Discovery	No	Certificate of No Objection	2019-05-02	1 1.351
43	Defendants	Discovery	No	Certificate of No Objection	2019-05-08	1 1.351
45	Defendants	Notice	No	Notice of Unavailability	2019-05-13	1 None
46	Defendants	Notice	No	Notice of Appearance of Counsel	2019-05-13	2 4-7.21(g)(3)
50	Defendants	Notice	No	Notice of Conflict	2019-10-08	2 None
51	Defendants	Discovery	No	Notice of Taking Deposition of Carrie Broussard	2019-10-30	2 None
52	Defendants	Discovery	No	Notice of Taking Deposition of Jerome Wilt	2019-10-30	2 None

Doc. No.	Party	Category	Sworn	Signed	Filing	Date	Pages	Authority
53	Defendants	Discovery	No	No	Request for Examination of Windsor by Dr. Stephen Goll	2019-11-07	3	1.360
54	Defendants	Notice	No	No	Notice of Conflict Amended	2019-12-20	2	None
57	Defendants	Discovery	No	No	Disclosure of Experts by Defendants	2020-01-09	4	None
63	Defendants	Notice	No	No	Notice of Cancellation of Depositions	2020-02-06	1	None
64	Defendants	Discovery	No	No	Amended Request for Examination of Windsor by Dr. Stephen Goll	2020-02-26	3	1.360
69	Defendants	Notice	No	No	Notice of Production of Non Party	2020-03-27	5	None
70	Boise	Discovery	No	No	Boise and Longest Response to Production Amended	2020-06-03	24	None
86	Defendants	Notice	No	No	Notice of Unavailability	2020-06-24	1	None
112	Defendants	Motion - Defendant	No	No	Motion to Determine Mental Competency of Plaintiff	2020-07-20	6	None
114	Defendants	Notice	No	No	Notice of Evidentiary Hearing	2020-07-22	3	None
117	Boise	Discovery	No	No	Notice of Service of Answers to Interrogatories	2020-07-27	2	1,340
118	Boise	Discovery	No	No	Response to Request to Produce - Fourth - Boise	2020-07-27	2	1,350
119	Boise	Discovery	No	No	Response to Request to Produce - Third - Boise	2020-07-27	2	1,350
120	Boise	Discovery	No	No	Response to Request to Produce - Second - Boise	2020-07-27	5	1,350
121	Longest	Discovery	No	No	Response to Request to Produce - Third - Longest	2020-07-27	2	1,350
122	Longest	Discovery	No	No	Response to Request to Produce - Second - Longest	2020-07-27	3	1,350
124	Defendants	Notice	No	No	Amended Notice of Hearing 4th day of August, 2020 at 2:45 p.m	2020-07-27	4	None
125	Defendants	Motion - Defendant	No	No	Motion to Dismiss and Motion for Contempt due to a purported federal court order	2020-07-27	7	None
127	Defendants	Exhibits - Defendants	No	No	Notice of Filing DEFENDANTS NOTICE OF FILING EXHIBITS	2020-07-28	30	None
129	Defendants	Exhibits - Defendants	No	No	Notice of Filing EXHIBITS IN SUPPORT OF DEFENDANTS JULY 27, 2020 MOTION TO DISMISS AND DEFENDANTS JULY 20, 2020 EMERGENCY MOTION TO DETERMINE COMPETENCY AND ENFORCE ADHERENCE AND FOR SANCTIONS	2020-07-29	15	None
139	Defendants	Notice	No	No	Notice of Hearing 2/18/2020 AT 3PM	2020-08-04	4	None



Doc#	Party	Category	Sworn Signed	Filing	Date	Pages	Legal Authority
140	Defendants	Motion - Defendant	No	No	2020-08-04	5	None
147	Defendants	Notice	No	No	2020-08-05	4	None
157	Defendants	Exhibits - Defendants	No	No	2020-08-13	48	None
172	Defendants	Notice	No	No	2020-08-19	2	SC 10-2101
173	Defendants	Notice	No	No	2020-08-19	2	4721(g)(3)
199	Defendants	Notice	No	No	2020-09-01	2	None
207	Defendants	Response	No	No	2020-09-21	3	None
210	Defendants	Notice	No	No	2020-09-23	3	None
224	Defendants	Motion - Defendant	No	No	2020-10-01	3	None
234	Defendants	Discovery	No	No	2020-10-30	3	1,350
235	Defendants	Discovery	No	No	2020-10-30	4	1,350
236	Defendants	Discovery	No	No	2020-10-30	4	None
237	Defendants	Discovery	No	No	2020-10-30	3	None
238	Defendants	Discovery	No	No	2020-10-30	2	1,340
242	Defendants	Notice	No	No	2020-11-04	4	None

Doc #	Party	Category	Sworn Signed	Filing	Date	Pages	Legal Authority
244	Defendants	Answer	No	Answer to Amended Complaint or Petition	2020-11-09	5	None
244.1	Defendants	Exhibits - Defendants	No	Exhibits to Answer to Amended Complaint or Petition	2020-11-09	73	None
249	Defendants	Motion - Defendant	No	Motion FOR AWARD OF ATTORNEY S FEES AND COSTS PURSUANT TO OMNIBUS ORDER ON MULTIPLE MOTIONS by ROBERT KEITH LONGEST & BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, LLC	2020-11-24	3	None
249.1	Defendants	Exhibits	No	Exhibits to Motion FOR AWARD OF ATTORNEY S FEES AND COSTS PURSUANT TO OMNIBUS ORDER ON MULTIPLE MOTIONS by ROBERT KEITH LONGEST & BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, LLC	2020-11-24	9	None
250	Defendants	Notice	No	Notice of Unavailability	2020-12-07	1	None
254	Defendants	Notice	No	Notice of Hearing 02/02/2021 at 11:00 AM	2020-12-24	3	None
278	Defendants	Motion - Defendant	No	Motion TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW	2021-07-17	11	None
278.1	Defendants	Exhibits	No	Exhibits to Motion TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW	2021-02-17	31	None
282	Defendants	Notice	No	Notice of Hearing APRIL 6TH, 2021 @10:15 A.M.	2021-02-22	?	None
289	Defendants	Motion - Defendant	?	Motion TO REQUIRE PRO SE PLAINTIFF WILLIAM WINDSOR'S SUBMISSIONS TO THE COURT BE REVIEWED, APPROVED AND SIGNED BY A MEMBER OF THE FLORIDA BAR AND MEMORANDUM OF LAW AND MOTION TO FIND PRO SE PLAINTIFF WILLIMA	2021-03-03	52	?

# EXHIBIT

# B

IN AND FOR THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND FOR  
ORANGE COUNTY, FLORIDA

WILLIAM WINDSOR

Plaintiff,

vs. Case No.: 2018-CA-010270-O

ROBERT KEITH LONGEST, an individual,  
and BOISE CASCADE BUILDING  
MATERIALS DISTRIBUTION, L.L.C., a  
Foreign Limited Liability Company,

Defendants.

**STIPULATION FOR SUBSTITUTION OF COUNSEL**

IT IS HEREBY STIPULATED AND AGREED that David I. Wynne, Jr., Esquire, is hereby substituted as counsel for the Defendants, ROBERT KEITH LONGEST and BOISE CASCADE BUILDING MATERIALS DISTRIBUTION, L.L.C., and that William Hyland, Esquire hereby withdraws as counsel for said Defendants.

DATED this 10th day of May, 2019.

<p><i>William Hyland</i></p> <hr/> <p>William Hyland, Esquire Vernis &amp; Bowling of Central Florida, P.A. 1450 S. Woodland Boulevard, 4th Floor DeLand, FL 32720 Phone: 386-734-2505 Bar No.: 402265</p>	<p><i>David I. Wynne, Jr.</i></p> <p>David I. Wynne, Jr., Esquire Law Offices of Scott L. Astrin 100 N. Tampa Street, Suite 2605 Tampa, FL 33602 Phone: 813-218-3118 Bar No.: 326290</p>
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing by Electronic

Mail:

David I. Wynne and Scott L. Astrin  
Law Offices of Scott L. Astrin  
Bogus Address: 100 N. Tampa Street, Suite 2605, Tampa, Florida 33602  
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813-526-0559 - 813-218-3110  
Fax: 813-649-8362

Judge Jeffrey L. Ashton  
37orange@ninthcircuit.org

This 29th day of March, 2021,



**William M. Windsor**  
100 East Oak Terrace Drive, Unit B3  
Leesburg, Florida 34748  
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billwindsor1@outlook.com