

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

PALM COAST HOLDINGS, INC. and
FLORIDA LANDMARK COMMUNITIES,
LLC,

Case No.: 2025-CA-670
Division: 49

Plaintiff,

vs.

CITY OF PALM COAST, a Florida Municipal
Corporation

Defendant.

RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION

Defendants, the City of Palm Coast, by and through undersigned counsel, hereby responds to *Plaintiff's Second Request for Production* as follows:

32. All documents and communications supporting the City's Second Affirmative Defense, as alleged in Defendant's Answer and Affirmative Defenses

RESPONSE: Documents responsive to this request are publicly available and accessible to the Plaintiffs through the City's Code of Ordinances and Land Development Regulations.

33. All documents and communications not previously produced related to or arising from the Vested Rights Application submitted to the City on August 19, 2025, by Holtzman Vogel on behalf of Plaintiffs.

RESPONSE: The City objects to this Request to the extent it is duplicative of prior Requests for Production. The City has provided all non-privileged documents in its possession, custody and control.

CERTIFICATE OF SERVICE

I certify that, in compliance with Fla. R. Gen. Prac. & Jud. Admin. 2.516, the foregoing document has been filed with the Florida Courts E-Filing Portal System on this 29th day of April 2026. Accordingly, a copy of the foregoing is being served on this day to the attorneys or interested parties identified in the e-Portal Electronic Service List, including those listed below, via transmission of Notices of Electronic Filing generated by the e-Portal System.

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