

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 2025-001578-CA-01
JUDGE: Beatrice Butchko Sanchez (CA22)

GIANCARLO SCHWARZ and
DIANA SCHWARZ, as parents and
natural guardians of G.S., a minor

Plaintiffs,

vs.

CITY OF NORTH MIAMI BEACH
a Political Subdivision of the State of Florida,

Defendant.

PLAINTIFF'S MOTION TO COMPEL DEPOSITIONS

COME NOW the Plaintiffs by and through undersigned counsel and hereby files this Motion to Compel Depositions, as grounds for said Motion states as follows:

1. Plaintiff has attempted on numerous occasions to obtain the continuation of Defendant's representative's deposition.
2. On 10/2/25, Plaintiff took the deposition of Gilberte Harris, Defendant's corporate representative. However, Ms. Harris did not have any of the requested documents from the duces tecum with him.
3. Plaintiff's counsel was unable to continue the deposition and has since requested update dates for Ms. Harris' deposition.
4. Further, Plaintiffs would like to take the following depositions:
 - a. Caitlyn Sill,

- b. Lovens Bellot,
- c. Gabriel Noguera,
- d. Mavis Peterson,
- e. Michael Hoyte,
- f. Alexis Robledo,
- g. Sandra Lynn,
- h. McNahika Guillaume,
- i. Jacob Newman, the director of HR,
- j. Ian Fors of Parks and Recreation.

5. To date, Defendant has not provided dates certain for setting these depositions.

WHEREFORE, Plaintiff respectfully moves this Honorable Court to compel Defendant to provide dates for the taking of the above deposition within 20 days to occur within 60 days.

1.202 (b) CERTIFICATE OF CONFERRAL

I HEREBY CERTIFY that, in accordance with Florida Rule of Civil Procedure 1.202(b), the undersigned has conferred with counsel for Defendant via correspondence dated 10/8/25 about the subject matter of this Motion and has made a good faith effort to resolve the issue. As of the date of filing this Motion, the Parties have been unable to agree upon a resolution without court intervention.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Mail this October 20, 2025, to GREENSPOON MARDER LLP Ahmand R. Johnson, Esq., ahmand.Plaintiffs@gmlaw.com; joseph.geller@gmlaw.com; Attorneys for Defendant *The City of North Miami Beach*.

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By: /s/ Jeffrey R. Davis
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