

IN THE SUPREME COURT OF FLORIDA

Supreme Court Case No.: SC19-1545

CATHERINE ELIZABETH CZYZ,

Respondent/Appellant,

vs.

THE FLORIDA BAR ASSOCIATION,

Complainant/Appellee.

_____ /

RESPONDENT'S/APPELLANT'S
MOTION TO PROPOUND DISCOVERY IN AID OF MOTION
TO VACATE
AND MOTION TO SHORTEN TIME

Respondent/Appellant, files this, her Motion to Propound Discovery in Aid of Motion to Vacate and Motion to Shorten Time, pursuant to Florida Rule of Civil Procedure 1.350, and states as follows:

1. The Respondent/Appellant filed a Motion to Vacate this

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Honorable Court's Order or Final Judgment rendered on January 6, 2022, suspending her from the practice of law for two years in Florida and a payment of \$41, 708.45 plus pre-judgment interest to Erin Neitzelt.

2. The Motion to Vacate makes citation to the misrepresentations of evidence made to the Referee by The Florida Bar Association in the post-Final Hearing Zoom hearing/meeting where Mr. Kaiser argued for Catheirne Elizabeth Czyz and Ms. Hinson argued for The Florida Bar Association.

3. To support the motion with evidence, Respondent/Appellant needs the transcript and video of said post -Final Hearing hearing(s)/meeting(s) to file with this Honorable Court.

4. Respondent/Appellant needs the video of the Final Hearing to file with this Honorable Court as evidence.

5. As such, Respondent/Appellant requests an Order

allowing her to propound the Request to Produce attached as Exhibit "A".

6. Furthermore, in the interests of judicial economy Respondent/Appellant requests that The Florida Bar Association produces the items in five (5) days.

WHEREFORE, the Respondent/Appellant requests this Honorable Court to issue an Order allowing her to propound discovery and to shorten time to five (5) days for The Florida Bar Association to produce items.

RESPECTFULLY SUBMITTED,

/s/ Catherine E. Czyz

Catherine E. Czyz

Pro Se

USPS Mailing Address:

931 Village Boulevard, Suite 905-242

West Palm Beach, FL 33409

catherinexliv@gmail.com

561-502-1542- direct

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-courts on January 10, 2023 to:

Shanee L. Hinson, Esq. and

Tiffany Roddenberry, Esq. and

Kevin Cox, Esq. and/or the attorneys listed as counsel of record at this time.

By: ___/s/ *Catherine E. Czyz*_____

Catherine E. Czyz

Pro Se

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EXHIBIT "A"

IN THE SUPREME COURT OF FLORIDA

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vs.

THE FLORIDA BAR ASSOCIATION,

Complainant/Appellee.

**RESPONDENT'S/APPELLANT'S
REQUEST FOR PRODUCTION**

Respondent/Appellant requests The Florida Bar Association to produce the following items and documents within five (5) days at the address shown below. This request is made pursuant to Rule 1.350, Fla.R.Civ.P.

DEFINITIONS

The following definitions shall apply to the discovery sought by this request. As used in this request:

I. The term "document" is intended to be comprehensive and to include, without limitation, all original writings of any nature whatsoever, copies and drafts which, by reason of notes, changes, initials or identification marks are not identical to the original and all non-identical copies thereof. In all cases where original and/or non-identical copies are not available, "document" also means identical copies of original documents and copies of non-identical copies.

II. The term "document" includes, but is not limited to, brochures, pamphlets, printed literature, reference materials, including but not limited to guidelines, manuals, statistical reference materials, underwriting guidelines or materials, correspondence, memoranda, contracts, leases, agreements, invoices, credit memoranda, credit files, records, data-sheets, blotters, purchase orders, sales orders, tabulations, reports, bills of lading, evaluations, work papers, summaries, opinions,

journals, diaries, books, statistical records, purchase reports, sales reports, financial reports, checks, notes, transcriptions, ledgers, telegrams, teletypes, telex messages, recording of telephone calls and other communications, minutes and notes of transcriptions of all meetings and other communications of any type, microfilms, tapes or other recordings, telephone or other logs and any other information which is stored or carried electronically, by means of computer equipment or otherwise, and which can be retrieved in printed or graphic form.

III. The term "relating" is defined to mean referring to, evidencing, pertaining to, consisting of, reflecting, concerning or in any way logically or factually connected with the matter discussed. When a request is made for documents relating to an allegation, all documents relating to any and all of the facts contained in the allegation are included and encompassed in the request.

DOCUMENTS AND ITEMS TO BE PRODUCED

1. The transcript of any and all post-Final Hearing Zoom Hearings/meetings, including the sentencing phase hearing (s) where Ms. Hinson argued for the Florida Bar Association, and Mr. Kaiser argued for Catherine Elizabeth Czyz.

2. The Zoom video of any and all post-Final Hearing Zoom Hearings/meetings, including the sentencing phase hearing (s) where Ms. Hinson argued for the Florida Bar Association, and Mr. Kaiser argued for Catherine Elizabeth Czyz on a USB stick.

3. The Zoom video for the Final Hearing on a USB stick.

RESPECTFULLY SUBMITTED,

/s/ Catherine E. Czyz

Catherine E. Czyz

Pro Se

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West Palm Beach, FL 33409

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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-courts on January 9, 2023 to:

Shanee L. Hinson, Esq. and

Tiffany Roddenberry, Esq. and

Kevin Cox, Esq. and/or the attorneys listed as counsel of record at this time.

By: ___/s/ *Catherine E. Czyz*_____

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