

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

ZENaida GONZALEZ,

Plaintiff,

Case No. 2008-CA-24573

v.

CASEY ANTHONY,

Defendant.

_____ /

DEFENDANT'S SECOND INTERROGATORIES TO PLAINTIFF

Defendant, Casey Anthony, by the undersigned counsel and pursuant to Rule 1.340 of the Florida Rules of Civil Procedure, hereby requests that Plaintiff, Zenaida Gonzalez, answer the following Interrogatories, in writing and under oath, within 30 days.

DEFINITIONS

1. The word "identify:"
 - a. When used in reference to a natural person, the word "identify" means Plaintiff is to state:
 - (i) His or her full name;
 - (ii) His or her present or last known business and residence address;
 - (iii) His or her present or last known business and residence telephone numbers.
 - b. When used in reference to a document or correspondence, the word "identify" means Plaintiff is to state:
 - (i) A description of the type of document (e.g., letter, memorandum, telegram, etc.)
 - (ii) The identity of the person(s) who authored or prepared it;
 - (iii) In the case of an agreement or contract, the identity of the signatory party(ies);

- (iv) The identity of the address(es), if any, and the recipient(s) of the original and any copy thereof;
- (v) The title thereof, if any, and a description of the general nature of its subject matter;
- (vi) The date on the document, or, if none, the approximate date of its preparation;
- (vii) The manner of distribution and publication, if any;
- (viii) The present location or custodian or, if unknown, the last location or custodian of the original and each copy thereof;
- (ix) The identity of any person(s) who can identify it;
- (x) Whether such documents or correspondence contained, enclosed, accompanied or were attached to any other documents, and if so, describe in detail said other documents.

c. When used in reference to any communication that is spoken or heard, “identify” means Plaintiff is to state:

- (i) The date(s) of each communication;
- (ii) The identity of the person(s) to whom each communication is made;
- (iii) The identity of the person(s) making each communications;
- (iv) A description of the circumstances under which each communication was made (e.g., meeting, conversation, interview, etc.);
- (v) The means by which each communication as made;
- (vi) The substance of each communication, quoting where possible; and
- (vii) The reason(s) for which each communication was made.

d. When used in reference to a communication that is written or read, “identify” means to provide all the information required for identifying documents.

2. The word “document” is used in these Interrogatories in the broad and liberal sense and means any written, typed, printed, recorded or graphic matter, however produced or reproduced, of any kind and description, whether sent, received, or neither, and all copies which differ in any way from the original (whether by interlineations, stamped received, notation, indication of copy sent or received, or otherwise) regardless of whether designated confidential, privileged or otherwise and whether an original, master, duplicate or copy, including, but not

limited to, papers, notes, account statements or summaries, ledgers, pamphlets, periodicals, books, advertisements, electronic mail, computerized information, objects, letters, memoranda, notes or notations of conversations, contracts, agreements, drawings, telegrams, audio or video tape recordings, communications, including inter-office and intra-office memoranda, delivery tickets, bills of lading, invoices, quotations, claims documents, reports, records, studies, work sheets, working papers, corporate records, minutes of meetings, circulars, bulletins, notebooks, bank deposit slips, bank checks, canceled checks, check stubs, diaries, diary entries, appointment books, desk calendars, data processing cards and/or tapes, computer software, photographs, transcriptions or sound recordings of any type of personal or telephone conversations, interviews, negotiations, meetings or conferences, or any other things similar to any of the foregoing.

3. As used herein, the word “communication” means any words heard, spoken, written or read, regardless of whether designated confidential, privileged or otherwise, and including, without limitation: (a) Words spoken or heard at any meeting, discussion, interview, encounter, conference, speech, conversation or other similar occurrence; and (b) Words written on or read from any document(s) as described above.

4. As used herein, the term “person” means individuals or entities of any type, including, but not limited to, natural persons, governments (or any agencies thereof), quasi-public entities, corporations, partnerships, groups, mutual or joint ventures and other forms of organizations or associations.

5. “Date” shall mean the exact day, month, and year, if ascertainable, or, if not, the best approximation thereof (including by relationship to other events).

6. The phrase “describe in detail” or “state in detail” calls for a complete description of all facts known to Plaintiff that are pertinent to the act, occurrence or event in question, including, where applicable, the date, time, place, circumstance, nature, substance, description or explanation of the act, event or occurrence, and the identity of all persons or entities involved in the act, event or occurrence.

7. As used herein, the words or phrases, “explaining”, “describing”, “defining”, “concerning”, “reflecting”, or “relating to” when used separately or in conjunction with another mean directly or indirectly mentioning, pertaining to, involving, being connected with or embodying in any way or to any degree the stated subject matter.

8. As used herein, “Plaintiff,” “You,” and/or “Your,” means “Zenaida Gonzalez” and any employees, agents, attorneys, contractors, sub-contractors, or other persons acting for, on behalf of, or at the request of Zenaida Gonzalez.

INTERROGATORIES

1. Identify any payments paid to you (and/or to any other person or entity on your behalf), whether directly or indirectly, since July 25, 2008, for appearances on and/or interviews by any television show, newspaper, publisher, producer, and/or any other media related person or company, and identify the payor, the payee, the date of the payment, the amount of the payment, and the purpose of the payment. This interrogatory includes any expenses that have been advanced and/or reimbursed.

ANSWER:

2. To the extent not included in the above answer, identify any payments paid to you and/or to any other person or entity on your behalf, whether directly or indirectly, for any hair treatment, skin treatment, dental work, clothing, shoes, jewelry, transportation, hotel accommodations, and food and drink, for and during your appearance on or about March of 2012, on the television show hosted by Dr. Phil McGraw (the Dr. Phil Show), and identify the source of the payment, amount paid, the date of payment, and the purpose for the payment.

ANSWER:

3. Identify the name(s) of the hotel(s) where you stayed during your appearance for the Dr. Phil Show in March of 2012 (televised April of 2012), the date(s) you stayed in the hotel(s), the type of suite(s) you stayed in at the hotel(s), who stayed with you in the hotel(s), any charges to the suite(s) made by you or those staying with you at the hotel(s), which name was used to secure the hotel(s), and the method(s) of payment used to secure and pay for the hotel(s).

ANSWER:

4. Identify how your television appearance in March of 2012 (televised April of 2012), on the Dr. Phil Show was organized, including who made the initial contact regarding your appearance, who negotiated any payments and/or compensation for your appearance on the Dr. Phil Show, who accepted any payments and/or compensation on your behalf, and who was present with you during your appearance on the show.

ANSWER:

5. Describe any contact, including but not limited to, face to face or telephonic interviews you have had since July 25, 2008, with business managers, marketing agents, entertainment managers, entertainment agents, and/or entertainment lawyers, and describe how the contact was initiated, who was present during any contact with the above-described agents and/or managers, and describe any payments or compensation you have received, directly or indirectly, from the above-described agents and/or managers including the source of the payment or compensation, amount paid, the date the payment or compensation was received, and the purpose for the payment or compensation.

ANSWER:

6. Describe in detail the gift(s) your daughters received from any employee(s) of Morgan and Morgan, P.A. as you testified to during your November 22, 2011 deposition, including the date the gift(s) were received, the employee(s) who presented the gift(s), and why the gift(s) were received.

ANSWER:

7. Identify any bank account(s) you have opened since July 25, 2008, including the name of the banking institution(s), the address(es) and telephone number(s) of the branch(es) where you opened the account(s), and whether the account(s) presently remain active.

ANSWER:

8. Identify any credit card account(s) you have opened since July 25, 2008, including the name of the credit institution(s), the address(es) and telephone number(s) of the institution(s) where you opened the account(s), and whether the account(s) presently remain active.

ANSWER:

9. To the extent not included in the above answers, describe all income that you or any other person or entity on your behalf received, directly or indirectly, since July 25, 2008, and identify the source of the income, the amount paid, the date of payment, and the purpose of the payments.

ANSWER:

10. Describe your employment/work history since November 22, 2011, and include the name, address, and telephone number for each employer, the period of employment, a description of your position and duties for each job, the amount, method and frequency of pay, and the reason your employment was terminated.

ANSWER:

VERIFICATION OF INTERROGATORY RESPONSES

I swear the foregoing responses are true and correct.

Dated this ____ day of _____ 2012.

By: _____
ZENAIDA GONZALEZ

SWORN TO and SUBSCRIBED before me this ____ day of _____, 2012, by
_____ who is personally known to me or produced _____
as identification.

NOTARY PUBLIC, State of Florida

My Commission Expires:

Printed Name of Notary Public