

IN THE CIRCUIT COURT OF THE 20<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR LEE  
COUNTY, FLORIDA

CASE NO.: 23-CA-010569

**CAROL BARDON,**  
**Individually,**

Plaintiff,

vs.

**ESTERO ISLAND PARASAIL,**  
**INC.; and PAUL KENNETH**  
**ZUMAN,**

Defendants.

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**CORPORATE SUMMONS**

**To: ESTERO ISLAND PARASAIL, INC.**

*by serving the registered agent:*      **Sharon F. Faircloth**  
11711 Isle of Palms Drive  
FT. Myers Beach, FL 33931

**IMPORTANT**

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Complaint in this Court. A phone call will not protect you; your written response, including the above case number and named parties, must be filed if you want the Court to hear your case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or legal aid office (list in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court, located at Clerk of Court, Lee County you must also mail or take a carbon copy or photocopy of your written response to the Plaintiff's attorney noted below:

**IMPORTANTE**

Usted ha sido demandado legalmente. Tiene 20 días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe

presentar su repuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefonica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's attorney" (Demandateo Abogado del Demandante).

### **IMPORTANT**

Des poursuites judiciaires ont ete entreprises contre vous. Vous avez 20 jour consecutifs a partir de la date de l'assignation de cette citation pour déposer une reponse ecrite a la plainte ci-jointe aupres de ce Tribunal. Un simple coup de telephone est insuffisant pour vous proteger; vous etes oblige de déposer votre reponse ecrite, avec mention du numero de dossier ci-dessus et du nom des parties nommees ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne deposez pas votre reponse ecrite dans le relai requis, vous risquez de perdre la cause ainsi que votre solaire, votre argent, et vos biens peuvent etre saisis par la suite, sans aucun preavis ulterieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requerir les services immediats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez telephoner a un service de reference d'avocats ou a un bureau d'assistance juridique (figurant a l'annuaire de telephones).

Si vous choisissez de déposer vous-meme une reponse ecrite, il vous faudra egalement, en meme temps que cette formalite, faire parvenir ou expendier une copie de votre reponse ecrite au "Plaintiff/Plaintiff's attorney (Plaignant ou a son avocat) nomme cidessous.

THOMAS GRAHAM, ESQ.  
MAUSNER GRAHAM INJURY LAW PLLC  
1 NE 2<sup>ND</sup> Ave, Suite 200 Miami, FL 33132  
Telephone: (305) 344-4878  
Facsimile: (305) 800-8677  
tom@mginjuryfirm.com  
yariz@mginjuryfirm.com  
eservice@mginjuryfirm.com

THE STATE OF FLORIDA

**TO EACH SHERIFF OF THE STATE:** You are commanded to serve this Summons and a copy of the Complaint in this lawsuit on the above-named Defendant.

DATED ON: 09/22/2023

Kevin C. Karnes  
as Clerk of said Court

BY *Christina Strup*  
(Seal) as Deputy Clerk



IN THE COUNTY COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR LEE  
COUNTY, FLORIDA CIVIL ACTION

CASE NO: 23-CA-010569

Bardon, Carol  
Plaintiff

vs

Estero Island Parasail Inc et al  
Defendant

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**STANDING ORDER IN CIRCUIT CIVIL CASES IN THE  
TWENTIETH JUDICIAL CIRCUIT**

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PURSUANT to Florida Rule of Civil Procedure 1.200(a), Florida Rule of Judicial Administration 2.545, and Administrative Order 1.13 (as amended) entered by the Chief Judge of this Circuit, the parties are ordered to adhere to the following information and procedures applicable to civil lawsuits:

1. **SERVICE OF THIS ORDER.** The Plaintiff is directed to serve a copy of this order with each Summons issued in this case. One copy of this Order is to be filed with the Clerk of the Circuit Court with proof of service. The Plaintiff shall pay the appropriate statutory clerk's fees on copies for each Standing Order issued and attached to the Summons.

2. **CIVIL CASE MANAGEMENT SYSTEM.** The Supreme Court of Florida has established guidelines for the prompt processing and resolution of civil cases. This Court has adopted a case management system to help meet those guidelines. In contested cases (other than residential foreclosures, involuntary commitment of sexually violent predators, Extraordinary Writs, 90 day Notice of Medical Malpractice Claim, and Administrative Appeals), the parties are required to participate in the case management system. The Court will issue a Case Management Plan after 150 days of the filing of a case in the event the parties have not submitted an Agreed Case Management Plan that has been approved by the Court. However, if it becomes necessary to amend the court-issued Case Management Plan, the parties may submit an Agreed Case Management Plan, subject to approval by the Court, or if the parties cannot agree on an Amended Plan, the parties may request a case management conference. The form of the Agreed Case Management Plan may be accessed at the Court's website at: <https://www.ca.cjis20.org/Programs/Civil-Case-Management/generalcivil.aspx>. If a case management conference is scheduled, attendance by trial counsel and those parties who are not represented by counsel is mandatory. Agreed Case Management Plans are to be submitted to Lee County Civil Case Management by email in Word format to [LeeCircuitCivilCM@ca.cjis20.org](mailto:LeeCircuitCivilCM@ca.cjis20.org) or if no access to email then mailed to Lee County Civil Case Management 1700 Monroe Street Fort Myers FL 33901. DO NOT file with the Clerk of Court.

3. **ALTERNATIVE DISPUTE RESOLUTION (ADR).** ADR provides parties with an out-of-court alternative to settling disagreements. The Court requires the parties to participate in

IN THE COUNTY COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR LEE  
COUNTY, FLORIDA CIVIL ACTION

ADR prior to trial. Mediation is mandatory unless the parties agree to another form of ADR. Mediation is a conference at which an independent third party attempts to arrange a settlement between the parties. The Court, at its discretion, may order the case be referred to Non-Binding Arbitration. Non-Binding Arbitration is the process in which the court refers a case to a registered arbitrator, or panel of arbitrators, who will hear evidence and make an award which may become a final judgment if a Motion for Trial De Novo is not timely filed pursuant to Fla.R.Civ.P. 1820(h).

4. **FAILURE TO PROSECUTE.** The Court will issue a Notice of Intent to Dismiss a case if there is no record of activity within a ten (10) month period of time.

5. **RULES OF PROFESSIONALISM.** The Twentieth Judicial Circuit has adopted Administrative Order 2.20, which sets forth standards of professional courtesy and conduct for all counsel practicing within the Circuit and self-represented litigants. The Court requires that all familiarize themselves and comply with Administrative Order 2.20. Administrative Order 2.20 may be viewed on the Court's website at: [http://www.ca.cjis20.org/web/main/ao\\_admin.asp](http://www.ca.cjis20.org/web/main/ao_admin.asp)

**DONE AND ORDERED** in Chambers at Fort Myers, Lee County, Florida.

*Michael T. McHugh (electronically signed)*  
Administrative Circuit Judge

**\*\*\*\*Original on file in the office of the Circuit Court Administrative Judge, Lee County**

IN THE CIRCUIT COURT OF THE 20<sup>th</sup>  
JUDICIAL CIRCUIT IN AND FOR LEE  
COUNTY, FLORIDA

**CAROL BARDON,**  
**Individually,**

Plaintiff,

vs.

***JURY TRIAL DEMANDED***

**ESTERO ISLAND PARASAIL,**  
**INC.; and PAUL KENNETH**  
**ZUMAN,**

Defendants.

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**COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL**

CAROL BARDON, hereby sues Defendants, ESTERO ISLAND PARASAIL INC; and, PAUL KENNETH ZUMAN, for damages, and states as follows:

1. This is an *in personam* action for damages in excess of \$50,000.00 (fifty-thousand dollars) exclusive of costs and interest, and is otherwise within the jurisdiction of this Court.
2. At all times material, Plaintiff Carol Bardon was and is a resident of the state of Indiana, over the age of eighteen (18) years, and is otherwise *sui juris*.
3. At all times material, Defendant Estero Island Parasail, Inc., (hereinafter “Estero Island Parasail”) was and is a Florida corporation for profit, authorized to do and doing business in Lee County, Florida.
4. At all times material, Defendant Paul Kenneth Zuman, was a resident of Lee County, Florida.