

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

CAROLY NOLEN, WINDY KELLEY,
CARA KELLEY and PAULA LITTON,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

CASE NO.: 6:20-cv-00330-PGB-EJK

FARISHARE VACATION OWNERS
ASSOCIATION,

Defendants.

**PLAINTIFFS' NOTICE OF FILING POTENTIALLY CONFIDENTIAL
MATERIAL IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiffs are filing, concurrently herewith, their Opposition to Defendant's Motion for Summary Judgment ("Opposition"). The Opposition references information in, and is supported by, documents marked by Defendant Fairshare Vacation Owners Association ("Fairshare") as "Confidential". The Opposition also references, and is supported by, testimony from Fairshare's corporate representative concerning such Confidential documents. This testimony has previously been noted as confidential by Fairshare's counsel on the record pursuant to M.D. Fla. Local Rule 1.11(d) (Jan. 2021). Plaintiffs give notice to Fairshare concerning their intended filing

of such Confidential matters with the Court in order to allow Fairshare to move for the materials to be sealed.

In the interim, Plaintiffs have filed a redacted version of the Opposition. The redacted Opposition omits the financial and other information Plaintiffs reasonably believe Fairshare considers confidential. The redacted exhibits to the Opposition are a redacted version of Exhibit “1” – the 2020 Fairshare Vacation Plan Use Management Trust Financial Statement Year Ended December 31, 2020 and a redacted version of Exhibit “5” – the Fairshare Vacation Owners Association, Inc., Board of Directors Meeting Minutes for the Regular Meeting of the Board of Directors held on December 2, 2020.

Respectfully submitted,

/s/John A. Yanchunis _____

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2021, I electronically filed a true and correct copy of the foregoing notice with the Clerk of the Court using the CM/ECF system, which will send notification to all attorneys of record in this matter.

/s/ John A. Yanchunis
Attorney