

IN THE CIRCUIT COURT OF THE 6TH  
JUDICIAL CIRCUIT, IN AND FOR PINELLAS  
COUNTY, FLORIDA  
GENERAL JURISDICTION DIVISION  
CASE NO: 07 CA 13084CICI

**GMAC MORTGAGE, LLC**  
PLAINTIFF

VS.

**DEBBIE VISICARO , ET AL**  
DEFENDANT(S)

MAY 24 2010

HB

**MOTION FOR PROTECTIVE ORDER**

COMES NOW, the potential deponent BETH CERNI, by and through her undersigned counsel, and moves this Honorable Court to issue a protective order against the taking of her deposition and supports thereof states as follows:

1. The undersigned has been advised by counsel for the Defendant that they want to take the deposition of Beth Cerni and are attempting to schedule deposition dates.
2. Beth Cerni is an employee of the law firm representing Plaintiff and her only involvement in the instance of the matter was in signing an affidavit in support of Motion for Summary Judgment.
3. The Motion for Summary Judgment, which was filed together with this affidavit signed by Beth Cerni, has now been denied and the motion is no longer pending.
4. Plaintiff is filing simultaneously with this motion a renewed Motion for Summary Judgment in which there is no affidavit being signed by Beth Cerni.
5. The Defendant seeking to take the deposition has been defaulted in this matter and thus has admitted to the allegations of the complaint. No meaningful information for use in this case can be gathered from this individual.
6. Further, Beth Cerni is located in Plantation, Florida and appearance at a deposition in Pinellas County would require the expense of airfare, which is unduly burdensome

in light of the fact the Defendants have not put forth any defenses to this action and have been defaulted.

WHEREFORE, the potential deponent Beth Cerni, respectfully requests this Court enter an order of protection against the taking of her deposition in this case.


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was forwarded this 20 day of May, 2010 to:

MICHAEL ALEX WASYLIK, ESQ.  
P.O. BOX 2245  
DADE CITY, FL 33526-2245  
ATTY FOR DEBBIE VISICARO & UNKNOWN SPOUSE OF DEBBIE VISICARO N/K/A FRANK VISICARO

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC  
3300 SW 34TH AVENUE, SUITE 101  
OCALA, FL 34474

JANE DOE N/K/A JILL GRANTLAND  
2002 DONEGAL COURT  
OLDSMAR, FL 34677

  
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GREGG DREILINGER  
Law Offices of David J. Stern  
900 South Pine Island Road, Suite 400  
Plantation, Florida 33324-3920  
954-233-8000  
Fla. Bar No.: 0025615