

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

XIULING HU,

Plaintiff,

v.

ZEN MASSAGE SPA, INC., a Florida
corporation, SP4 INVESTMENTS, LLC, a
Florida limited liability company, ANNA
HUA, an individual, BIHN TEN DIEP, an
individual, and LAURIS HUA, an
individual,

Defendants.

CASE NO: CACE-22-009473

**For the Issuance of an
Arizona Subpoena Under
Ariz. R. Civ. P. 45.1.**

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO Scottsdale Insurance Co.
18700 N. Hayden Rd.
Scottsdale, AZ 85255
Attn: Underwriting

**YOU ARE COMMANDED TO APPEAR AT 3101 MAGUIRE, SUITE 270,
ORLANDO, FLORIDA 32803 WITHIN FIFTEEN (15) DAYS FROM THE SERVICE
OF THIS SUBPOENA, AND TO HAVE WITH YOU AT THE TIME AND PLACE
AND TO HAVE WITH YOU AT THAT TIME AND PLACE THE ITEMS LISTED ON
ATTACHMENT "A." FOR DEFINITIONS OF TERMS, PERSONS AND ENTITIES,
REFER TO ATTACHMENT "B."**

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. **You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production.** You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this subpoena,

you may be in contempt of court. You are subpoenaed by the attorney whose name appears on this subpoena and unless excused from this subpoena by the attorney or the Court, you shall respond to this subpoena as directed.

Dated April 11, 2023.

By: /s/Laddie A. Buholz
Laddie A. Buholz, Esquire
lbuholz@pughlawoffice.com
Florida Bar No. 80187
Jason M. Pugh, Esquire
Florida Bar No. 70358
lbuholz@pughlawoffice.com
contact@pughlawoffice.com
Pugh Law Office P.A.
PO Box 780941
Orlando, FL 32878
+1 (888) 512-0868
Attorney for Plaintiff

ATTACHMENT "A"

This subpoena concerns policy number CPS3163900 (renewal of policy number CPS3067829) issued to Anna Hua, Lauris Hua, or Bihn Diep, or any of their agents or employees, concerning the insured's property located at 2400 East Oakland Blvd., Suite 200, Ft. Lauderdale, FL 33306. **This subpoena does not ask for attorney-client privileged information, work-product privilege information, financial information of either the insured, insurer, agent or underwriters.** Please provide the following:

1. A copy of the application for insurance and all supporting documentation
2. Photographs or video of the interior of Suite 200
3. Documents showing maintenance and repair standards for Suite 200 or the building in general
4. Documents showing risk improvement recommendations
5. Documents showing common and special hazards of the building at the time of issuance of the policy
6. Documents showing Inspection records of Suite 200 or the building in general
7. Correspondence from insured concerning past construction performed on the property
8. Emails or other correspondence from insureds identifying slip and falls occurring in Suite 200 or the building in general from 2014 to present, including the name(s) of the person to whom claims are reported.
9. Current and prior high-risk notifications concerning the property
10. Inspection reports showing approval or disapproval of the property for the purpose of underwriting and possible hazards noted
11. Audio recordings of all reports of slip and falls from 2014 to present

ATTACHMENT “B”**Definitions**

The following definitions apply:

1. “Anna Hua, Lauris Hua and Bihn Diep” refers to Defendants or Insureds,
2. “Xiuling Hu” or the like refers to Plaintiff.
3. “Communication” or “communications” shall mean and refer to any oral or written contact or transmittal of information (in the form of facts, ideals, inquiries, or otherwise) between two or more persons or entities by all means, including, without limitation, letter, memorandum, facsimile, electronic mail (including any and all attachments), video conferencing, text messaging and every other mode of intentionally conveying information.
4. “Document” or “documents” shall include every writing, printed or graphic matter or record of any type and description and any other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed including the originals and all non-identical copies, whether by reason of any notation made on such copy or otherwise and including, without limitation, the original and any nonidentical copy of any of the following: correspondence, letters, memoranda, stenographic or handwritten notes (of meetings, telephone or other conversations, communications and interoffice or intraoffice telephone calls), messages, telegrams, teletype, telefax, bulletins, minutes of meetings, drafts, studies, publications, press releases, statements, transcripts of testimony, affidavits, summaries, excerpts, journals, diaries and calendar or diary entries, books, records, accounts, pamphlets, voice recordings, reports, surveys, tables, charts, statistical compilations, analyses, applications, work papers, forms, photographs, diaries, chronological data, minute books, ledgers, invoices, worksheets, receipts, returns, computer printouts, prospectuses, financial

statements, schedules, contracts, agreements, leases, cancelled checks (front and back), magazine or newspaper articles, (and any and all drafts, alterations, addenda, modifications, changes and amendments of any of the foregoing), aural records or representations of any kind, including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures and electronic mechanical or electric recordings or representations of any kind (including without limitation, tapes, cassettes, discs and recordings) or any other writing or recording of any kind. The terms "document" or "documents" also include any e-mail (including any and all attachments) or other electronically stored information (including information or programs stored in a computer, whether or not ever printed out or displayed, or in the cloud), as well as any other tangible thing on which information is recorded in writing, sound, laser, electronic or magnetic impulse. The terms "document" or "documents" also include any commentary or notation of any kind which does not appear on the original of a document.

5. The term "Document(s)" means every document or group of documents or communications as above-defined known to you, and every such document or communication which can be located or discovered by reasonably diligent efforts.

6. "Person" - means any natural person, individual, proprietorship, partnership, corporation, limited liability company, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity.

7. The term "you" or "your" means the person to whom this subpoena is addressed, including its divisions, departments, subsidiaries, affiliates, predecessors, present or former officers, directors, owners or agents and all other persons acting or purporting to act on your behalf as well as each partnership in which it is a partner.

