

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION

FILED FOR RECORD
VENICE BRANCH
2006 APR 26 PM 1:07
KAREN E. ROSS
CLERK OF CIRCUIT COURT
SARASOTA COUNTY, FL

GEORGE HUNT,
Plaintiff,

vs.

CASE NO.: 2006-CA-2857-SC

JOHN PATTEN,
Defendant.

MOTION FOR MORE DEFINITE STATEMENT

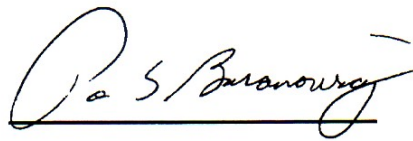
Defendant, John Patten, through undersigned counsel, moves the court for an order, pursuant to FRCP 1.140 (e), requiring a more definite statement of facts in the complaint, and as grounds therefore states as follows:

1. The complaint is so vague and ambiguous that the defendant cannot reasonably be required to answer same. The complaint fails to specify what statements were made, to whom, and when, and fails to set forth specific information to evaluate defenses, including but not limited to: a.) legal sufficiency of the complaint; b.) whether any statements were actionable or merely opinion as to future events; c.) whether Plaintiff's allegation that he was not a "public figure" renders this a sham pleading; d.) whether conditions precedent to the bringing of this defamation action have been satisfied; e.) whether venue is even proper in Sarasota County, and f.) whether expedited review of the merits is obtainable under Florida's "SLAPP" statute.

Wherefore, Defendant John Patten requests that this Court order Plaintiff to

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Dkt: ROT

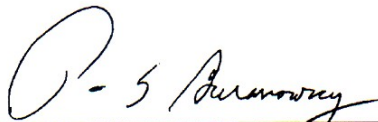
replead the complaint with adequate specificity, or such other relief as is proper including “striking” the pleading.



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Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via U.S. Mail to Andrew Froman, Esq., 1819 Main Street, Suite 1100, Sarasota FL 34236 this 24 day of April, 2006.



PETER S. BARANOWICZ, ESQ.,