

BEFORE THE FLORIDA JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

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SC13-1333

INQUIRY CONCERNING A JUDGE No. 12-613

LAURA M. WATSON

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**JUDGE LAURA M. WATSON'S FIRST**  
**REQUEST FOR PRODUCTION TO THE JUDICIAL QUALIFICATIONS**  
**COMMISSION**

The Honorable Laura M. Watson, pursuant to Rule 12 of the FJQCR adopting Florida Rules of Civil Procedure 1.350, hereby files her First Request for Production of Documents to the Judicial Qualifications Commission ("JQC"). The JQC has thirty (30) days from the date of service within which to respond/comply with the Request. The JQC must respond and produce those documents in its possession. When producing documents responsive to this Request the JQC is to designate those documents which it is producing in response to this Request.

**DEFINITIONS AND INSTRUCTIONS**

1. **"Documents"** means any tangible thing, recording or reproduction in any manner, any visual or auditory data in your possession, including without limiting the generality of its meaning, correspondence, memoranda, transcripts, stenographic or handwritten notes, telegrams or telexes, letters, reports, graphs or charts, ledgers, invoices, diaries or calendars, minute books, meeting minutes, computer print-outs, prospectuses, financial statements, annual, quarterly or other filings with any governmental agency or department, annual reports (including schedules thereto), statistical studies, articles appearing in publications, press releases, video or audio tapes, computer data bases, hard drives, storage tapes or disks, all e-mail data, and any papers on which words have been written, printed, typed or otherwise affixed, and shall mean a copy where the original is not in the possession of the JQC, and shall mean every copy of every document where such copy is not an identical copy of an original (whether different from the original by reason of any notation made on such copy or any other reason).

2. As used herein, the words **"in its possession"** shall mean: actual custody or holding of the document or tangible thing as defined in paragraph one.

3. If any of these documents cannot be produced in full, produce them to the extent possible, specifying your reasons for your inability to produce the remainder and stating whatever information, knowledge or belief you have

concerning the unproduced portion.

4. As used herein, the words "**pertain(s) to**" or "**shows**" shall mean: relates to, refers to, contains, concerns, describes, mentions, constitutes, supports, corroborates, demonstrates, proves, evidence, refutes, disputes, rebuts, controverts and/or contradicts.

5. Pursuant to Florida Rules of Civil Procedure 1.280(5), regarding **claims of privilege**, for each document responsive to these requests which is withheld under any claim of attorney-client privilege or work product privilege, provide a statement by a person having knowledge setting forth as to each document:

- (a) Name and title of the author(s);
- (b) The name and title of each person to whom the document was addressed;
- (c) The name and title of each person to whom a copy of the document was sent;
- (d) The date of the document;
- (e) The number of pages;
- (f) A brief description of the nature and subject matter of the document;

- (g) The nature of the claimed privilege;
- (h) The category or categories of this request to which the document is responsive; and
- (i) The exact location of the original and each copy as of the date of the receipt of this request.

Pursuant to rule a “ the party shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Florida Rules of Civil Procedure 1.280(5).

### **DOCUMENTS REQUESTED**

1. Provide all written statements of witnesses which pertain to this matter in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.
2. Provide all transcripts of testimony of witnesses which pertain to this matter in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.
3. Provide all documents (as defined above) which pertain to this matter

in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.

4. Provide all affidavits which pertain to this matter in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.

5. Provide all complaints under oath indicating that Judge Watson is guilty of willful or persistent failure to perform judicial duties in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.

6. Provide all complaints under oath indicating that Judge Watson is guilty of conduct unbecoming a member of the judiciary demonstrating a present unfitness to hold office in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.

7. Provide all complaints under oath indicating that Judge Watson has a disability seriously interfering with the performance of the judge's duties, which is, or is likely to become permanent in nature in possession of the Investigative Panel on April 18, 2013- date of the *Notice of Investigation* to Judge Watson.

8. Provide all written statements of witnesses which pertain to this matter in possession of the Investigative Panel on July 24, 2013- date of the *Notice*

*of Formal Charges* to Judge Watson.

9. Provide all transcripts of testimony of any witnesses which pertain to this matter in possession of the Investigative Panel on July 24, 2013- the date the JQC filed its *Notice of Formal Charges* against Judge Watson.

10. Provide all documents (as defined above) or other materials which pertain to this matter in possession of the Investigative Panel on July 24, 2013- the date the JQC filed its *Notice of Formal Charges* against Judge Watson.

11. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel voted to submit formal charges to the hearing panel against Judge Watson.

13. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel voted individually on each and every numbered allegation which appears in the its *Notice of Investigation* served on Judge Watson.

14. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel voted individually on each and every

numbered allegation which appears in the *Notice of Formal Charges* filed with the Clerk of the Supreme Court in this matter.

11. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Hearing Panel designated Laurie Waldman Ross to serve as Counsel to the Hearing Panel.

12. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel designated Miles McGrane as Special Counsel before the Investigative Panel.

12. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel designated Miles McGrane as Special Counsel before the Hearing Panel.

13. Provide all meeting minutes, meeting books, stenographic or handwritten notes, computer records or any other document (as defined above) which reflects that the Investigative Panel designated Miles McGrane to prepare appropriate papers and pleadings and the directions to Special Counsel advising him of the allegations on which the Investigative Panel found probable cause.

Respectfully submitted,

The Honorable Laura M. Watson  
Circuit Judge, 17<sup>th</sup> Judicial Circuit  
Room 1005B  
201 SE 6<sup>th</sup> Street  
Fort Lauderdale, Florida 33301  
Tel.: (954) 831-6907  
jwatson@17th.flcourts.org

/s/ Laura M. Watson  
LAURA M. WATSON  
Florida Bar No.: 476330

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by email to: Miles A. McGrane, III, Esq. [miles@mcgranelaw.com](mailto:miles@mcgranelaw.com) The McGrane Law Firm, Special Counsel, One Datan Center, Ste. 1500, 9100 South Dadeland Boulevard, Miami, Florida 333156; Lauri Waldman Ross, Esq. [RossGirten@Laurilaw.com](mailto:RossGirten@Laurilaw.com) Counsel to the Hearing Panel of the JQC, Ste. 1612, 9100 South Dadeland Boulevard, Miami, Florida 333156; Michael L. Schneider, Esq. [mschneider@floridajqc.com](mailto:mschneider@floridajqc.com) General Counsel, 1110 Thomasville Road, Tallahassee, Florida 32303, this 26th day of August 2013.

Pursuant to FJQCR Rule 10(b) a copy is furnished by email to: The Honorable Kerry I. Evander, [evanderk@flcourts.org](mailto:evanderk@flcourts.org), Chair of the JQC, 300 S.



Beach Street, Daytona Beach, FL 32114.

/s/ Laura M. Watson  
LAURA M. WATSON