

**IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT, IN AND  
FOR LEON COUNTY, FLORIDA**

**SANDRA ALLEN MANNING,**

**Case No. 2019-CA-446**

**Plaintiff,**

v.

**CITY OF TALLAHASSEE,**

**Defendant.**

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**DEFENDANT'S WITNESS LIST**

Defendant, **CITY OF TALLAHASSEE**, by and through undersigned counsel, pursuant to the Court's May 5, 2021 Order Setting Case Jury Trial, hereby files its witness list as follows:

**A. Category A Witnesses**

1. Plaintiff  
c/o Marie A. Mattox, P.A.  
203 North Gadsden Street  
Tallahassee, Florida 32301

Knowledge of Plaintiff's claims and alleged damages.

2. Alison Faris  
c/o Sniffen & Spellman, P.A.  
123 N. Monroe Street  
Tallahassee, FL 32301

Ms. Faris was selected for the position Plaintiff claims she should have received, despite Plaintiff never applying for it. Knowledge of being appointed and serving as interim Director of Communications and permanent Director of Communications since January 2016. Also has knowledge of supervising Plaintiff and Plaintiff's work performance.

3. Reese Goad  
c/o Sniffen & Spellman, P.A.  
123 N. Monroe Street  
Tallahassee, FL 32301

Current City Manager with knowledge of city reorganizations under Rick Fernandez. Knowledge of supervising Plaintiff. Knowledge of Plaintiff's work performance.

4. Ricardo J. Fernandez  
3516 Raymond Diehl Road  
Tallahassee, Florida 32309

Former City Manager with knowledge of city reorganizations under his tenure. Knowledge of working with and selecting Faris as interim and then permanent Director of Communications. Knowledge of meeting with Michelle Bono before appointing Faris.

5. Michelle Bono  
3493 Gardenview Way  
Tallahassee, Florida 32309

Past Director of Communications with knowledge of supervising Plaintiff and Faris. Knowledge of recommending Faris as her successor as Director of Communications.

6. Ellen Blair  
c/o Sniffen & Spellman  
123 North Monroe Street  
Tallahassee, Florida 32301

City's HR Director with knowledge of city's reorganizations under Rick Fernandez. Knowledge of Plaintiff's "complaint" of discrimination and her unsuccessful attempt to interview Plaintiff following up on that complaint.

7. Cynthia Barber  
c/o Sniffen & Spellman, P.A.  
123 North Monroe Street  
Tallahassee, Florida 32301

Knowledge of city reorganizations under Rick Fernandez.

## **B. Category B Witnesses**

8. Allison Merzer Fleming  
6051 Kennelly Court  
Tallahassee, FL 32317

Knowledge of working with Plaintiff as a Commissioner's aide.

- 9.** Thomas Bronakoski  
2610 Farragut Way  
Tallahassee, Florida 32308

Knowledge of being supervised by both Plaintiff and Faris.

- 10.** Kynder Lisa Crossner  
2612 Onyx Trail  
Tallahassee, Florida 32303

Knowledge of being supervised by Plaintiff while Plaintiff was Director of Community Relations.

- 11.** Jay Johansen  
3608 Buckner Court  
Tallahassee, Florida 32311

Knowledge of being supervised by both Plaintiff and Faris.

- 12.** Lorin Pratt  
1415 Conservancy Drive  
Tallahassee, Florida

Knowledge of testifying in deposition to matters that did not occur.

- 13.** Jamie Van Pelt  
1559 Fernando Drive  
Tallahassee, Florida 32303

Knowledge of working with Plaintiff as a Commissioner's aide.

- 14.** Angela Whitaker  
2404 Hartsfield Road  
Tallahassee, Florida 32303

Knowledge of working with Plaintiff as a Commissioner's aide.

- 15.** M'Lisa Ingram  
c/o Sniffen & Spellman  
123 North Monroe Street  
Tallahassee, Florida 32301

Knowledge of working with Plaintiff as a Commissioner's aide.

**16. Heather Teter**  
Address unknown

Knowledge of coordinating Rosa Parks event for City of Tallahassee.

**17. Jean Chen**  
c/o Sniffen & Spellman  
123 North Monroe Street  
Tallahassee, Florida 32301

Knowledge of complaint against Plaintiff for discrimination and harassment due to Chen's national origin.

**18. Kathleen Wright**  
c/o Sniffen & Spellman  
123 North Monroe Street  
Tallahassee, Florida 32301

Knowledge of Chen's complaint against Plaintiff for discrimination and harassment due to national origin.

**19. Lizzie Kelly**  
c/o Sniffen & Spellman  
123 North Monroe Street  
Tallahassee, Florida 32301

Knowledge of working with Plaintiff and being supervised by Faris.

**20. Gil Ziffer**  
735 Beard Street  
Tallahassee, Florida 32303

Knowledge of Faris' work with communications following Hurricane Hermine.

**21. Terreze Gamble, MD.**  
2646 Centennial Place, Suite A  
Tallahassee, Florida 32308

Knowledge of Plaintiff's 2017 FMLA leave and alleged damages.

**22. Louisa Martin, LMFT**  
2940 East Park Avenue, Suite 1-A  
Tallahassee, Florida

Knowledge of Plaintiff's alleged damages.

23. Karen Moore/Terrie Ard  
Moore Communications  
2011 Delta Boulevard  
Tallahassee, Florida

Knowledge of working with both Plaintiff and Faris at various times.

**C. Category C Witnesses**

24. **All rebuttal witnesses as necessary.**
25. **All impeachment witnesses as necessary.**
26. **All witnesses listed by Plaintiff, not objected to by Defendant.**

Dated this 30th day of November, 2021.

Respectfully submitted,

/s/ Michael P. Spellman

**MICHAEL P. SPELLMAN**

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*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing on counsel of record for Plaintiff, via the Florida Court's E-filing Portal this 30th day of November, 2021.

/s/ Michael P. Spellman

**MICHAEL P. SPELLMAN**