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August 10, 2022

Shane T. Costello, Esquire
Hill Ward Henderson
101 E. Kennedy Blvd, Suite 3700
Tampa, Florida 33602

By Electronic Transmission to Shane.Costello@hwlaw.com

Re: Nordbeck et al. v. Hillsborough County
Case No. 2022-CA-4745

Dear Mr. Costello:

As you know, our firm represents the Plaintiffs in the above-referenced action. The action challenges the Hillsborough County approval of construction plans (“Approval”) for property owned by your client, Taylor Morrison of Florida, Inc.

In that regard, it has come to our attention that construction and installation of improvements by your client, including but not limited to utilities, is ongoing. This correspondence is to officially notify you and your client that the plaintiffs, if successful, will demand the removal of all improvements that are found to be in violation of the applicable Hillsborough County Comprehensive Plan(s), pursuant to the authority of *Pinecrest Lakes v. Shidel*, 795 So. 2d 191 (Fla. 4th DCA 2001) (*rev. den.* 821 So. 2d 300 (Fla. 2002)) (copy attached for your convenience).

Therefore, since the Complaint filing on June 6, 2022, any improvements installed or constructed by your client pursuant to the Approval that are found to be in violation of the Plan are installed at your client’s risk and responsibility, with the full knowledge that such improvements and construction may be required to be removed and the property restored to its pre-development condition. Armed with this knowledge, it is the Plaintiffs’ position that any cost of such removal and restoration would be solely the responsibility of your client.

Sincerely,

CRAWFORD, MODICA & HOLT,
CHARTERED ATTORNEYS AT LAW

Jimmy D. Crawford

Jimmy D. Crawford, Esquire

Attachment

c: Client
Mary Dorman, Esquire
Cameron Clark, Esquire