Ellis Akins
[redacted]

November 11, 2026
By email and certified mail
Return receipt requested

Jennifer L. Davis, Esq.
Arias Bosinger PLLC
Counsel for Panther Ridge Homeowners Association of Brevard, Inc.
[redacted]

Litigation hold request: December 1 Board election and [redacted]

Dear Jennifer Davis,

I dispute the Association's decision to exclude me from the December 1 election and the debt on which it relies. I reasonably anticipate litigation or election arbitration. Please immediately preserve all paper records, electronic information and physical evidence relevant to the matters below. Please issue a litigation hold today and circulate it to the Association, its current and former directors and officers involved, and Associa – Community Management Professionals (CMP), including its managers, accounting staff and system administrators.

Your November 10 response acknowledges my November 8 and 10 notices, states that my name will be removed, and commits to preserving both ballots and the related consent, access and delivery records. Please have the voting administrator capture the current ballot and settings before any further change, retain all earlier versions still available, and preserve the audit trail of each change. Please also have the accounting administrator secure the ledger and payment history as it appeared at the November 11 nomination deadline.

Candidacy and disqualification. Keep my November 3 filing and candidate sheet, receipt and forwarding emails, eligibility criteria and candidate lists, along with the instructions, decisions and records relied on to include or remove my name. Preserve who made each decision, when it was made or revised, the balance reviewed and any reviews before, at or after the 5 p.m. Eastern nomination cutoff on November 11.

Disputed assessment and payment. Preserve the underlying invoices, costs, approvals, demands, delivery records, due dates, collection files and any additional fees claimed. The verification signed November 9 lists [redacted] in fees and [redacted] in costs. On November 11 my TownSq account showed a [redacted] balance and a [redacted] Preserve the original ledger entries, edit history, processor records and timestamps for initiation, authorization, posting, application, settlement or return, including time zones and when each status became visible to management.

Electronic voting and ballot changes. Keep the November 9 notification, the five-name ballot shown on another member's phone, the proposed four-name version and every version published or withdrawn. Preserve opening and closing times, settings, invitation lists, deliveries, failures, administrator actions, vendor tickets and any accepted or rejected submissions and aggregate counts by version. Keep timestamps precise enough to determine whether any votes were accepted before 5 p.m. Eastern on November 11.

Election administration and related disputes

Voter access and paper election records. Preserve the separate voting and email-notice consents, my March 2023 form and submission, 2025 voting access records, my September 2026 notice revocation, voter rosters, account permissions and changes affecting access. Keep notices, printing proofs, candidate sheets, mailing files, envelopes, returned mail, paper ballots, sign-in and tally records, and recount or challenge materials as created. Maintain ballot secrecy and the chain of custody. Keep voter authentication separate from ballot choices and sealed ballots intact under the applicable procedures. See Fla. Stat. §§ 720.303(4)(a)12. and 720.317(1)(b).

Campaign communications. Retain the original flyer and source files, drafts, edits, approvals and authorizations for the November 5 TownSq post and November 6 management email advocating for sitting directors. Keep records of the separate TownSq email, any weekly digest, recipient lists, delivery or removal logs, candidate access to those channels and related expenditures. Include the 2025 election and subsequent appointments to the three seats.

Enforcement and Board action. Keep complaints, witness accounts, photos, videos, inspection notes, approvals and comparable sign or vehicle enforcement files relating to the vehicle magnet and alleged community signs. Preserve the underlying TownSq requests, assignments and communications cited as harassment, any records of the October 31 interaction with President Mapes, and instructions restricting contact or directing counsel to act. Include any Board, architectural review or fining committee proceedings, the November 10 “Legal Ledger Charges” agenda item, notices, drafts, minutes, votes, remote-meeting recordings, chat and attendance logs.

Records access and underlying transactions. Keep the September 12 expenditure request, October 6 production and October 2 minutes request, including delivery receipts, routing, searches, responses, inspection offers, files produced and the November 2025 minutes sought. Preserve the supporting vendor records, including Klean Power Electric invoices and approvals, and committee appointments, membership eligibility and expenditures raised in my requests.

Custodians and time period. Please apply the hold to all relevant material in each custodian’s possession, custody or control, including records your firm holds. Cover the period from November 1, 2025 through resolution, and earlier records bearing on these matters, including voting consents, governing authority and my dealings with prior boards. Continue preserving new records as events occur. Please promptly notify relevant committee members, TownSq, election, mailing, meeting and payment vendors and ask each to preserve the material it holds.

Sources and preservation steps. Preserve paper originals and native electronic files with attachments, email headers, metadata, revisions, audit logs and available backups containing unique evidence. Include emails, SMS, iMessage, WhatsApp or other group chats, direct messages, voicemail, calendars, notes, shared drives and photos or recordings, including exchanges among directors and with CMP, vendors or counsel on work or personal accounts and devices. Suspend relevant auto-deletion, disappearing messages, log rotation and overwriting. Preserve privileged and confidential material securely. This request is for preservation only.

Please acknowledge receipt by return email. Within one business day of receipt, please confirm in writing that the hold is in place, the relevant custodians and vendors have been notified, and the ballot and ledger histories have been secured. If any material is already unavailable or at imminent risk, please identify the source, the affected period and any known alternate copy promptly.

Sincerely,

Ellis Akins