

IN THE CIRCUIT COURT OF THE 17<sup>th</sup> JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA

POMPANO SENIOR SQUADRON FLYING CLUB, INC.  
(aka POMPANO BEACH FLYING CLUB)

Plaintiff,

and

Case No.: CACE 20-005993  
Division (8)

CARL L. KENNEDY, II

Defendant.

**SECOND MOTION FOR EXTENSION OF TIME**  
**DUE TO PLAINTIFF'S KNOWING AND INTENTIONAL INTERFERENCE**  
**WITH DEFENDANT'S ABILITY TO OBTAIN COUNSEL**

TO THE HONORABLE JUDGE OF THIS COURT:

I, Carl Kennedy, hereby respectfully request an additional extension of time to obtain counsel in this matter who can help me respond to Plaintiff's Complaint. Plaintiff has filed a Bar Complaint against my known attorney of choice, Wendy Hausmann, (who often provides me with legal services pro bono as a professional courtesy), alleging that she should not be able to represent me in this matter. This is a knowing and intentional interference and attempt by Plaintiff to prevent me from obtaining an attorney and therefore, I respectfully request either 1) the ability to respond to the Complaint until thirty (30) days after the Bar Grievance has been resolved so that I may hopefully use my attorney of choice in this matter; or 2) that Plaintiff be required to provide me with sufficient temporary attorney's fees to enable me to hire a different attorney sooner, especially since Plaintiff is using my own money (monthly Club dues which I continue to pay as a member) to sue me, I should also be able to use my own money in my own defense if Plaintiff forces me to incur attorney's fees by having to use a different attorney than my pro bono one. Plaintiff will not be prejudiced nor will any irreparable harm occur if this Motion is granted, while I will be significantly prejudiced if this Motion is not granted.

I hereby certify that on the 30<sup>th</sup> day of June, 2020 I sent a copy of this Motion via the Florida e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com.

Respectfully submitted,

/s/ Carl L. Kennedy, II

Carl L. Kennedy, II

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