

IN THE CIRCUIT COURT OF THE 17th 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

MOTION TO TRANSFER VENUE TO PALM BEACH COUNTY

TO THE HONORABLE JUDGE OF THIS COURT:

I, Carl L. Kennedy, II, respectfully request that this matter be transferred to Palm Beach County, and as reasons therefore, represent as follows:

1. I am not now, nor have I ever been, a resident of Broward County, but have always been a resident of Palm Beach County.
2. I do not now, nor have I ever, had a business in Broward County, but have only ever had my accounting office in Palm Beach County.
3. I did not perform my duties as Treasurer of Pompano Beach Flying Club in Broward County, but have only maintained documents/records as Club Treasurer from my home or office, both of which are located in Palm Beach County. Any documents or other records or things which Plaintiff seeks could only be located in Palm Beach County.
4. Since I became Treasurer in April, 2014, and at all times thereafter prior to February, 2020 (following the Club's annual elections), the Pompano Beach Flying Club has not had a mailing address in Broward County, but only in Palm Beach County.
5. Since I became Treasurer in April, 2014, and at all times thereafter prior to February, 2020 (following the Club's annual elections), the Registered Agent for Pompano Beach Flying Club has been in Palm Beach County.

6. The current mailing address in Broward County on the letterhead for the Club is the home address of the Club's new President. Since I became Treasurer in April, 2014, and at all times thereafter prior to February, 2020 the Club itself has not had a physical office location in Broward County from which Club business was conducted.

7. I have little to no connection with Broward County. This matter should be transferred to where I live, work and conducted all business as Treasurer in connection with Pompano Beach Flying Club, which is in Palm Beach County.

WHEREFORE, I respectfully request that this matter be transferred to Palm Beach County where I live, work and conducted all business as Treasurer in connection with Pompano Beach Flying Club, and all other relief this Court deems just and proper.

I hereby certify that a true and correct copy of the foregoing has been served to Edward Holodak, Esquire via the Florida e-portal on this 17th day of July, 2020.

Respectfully submitted,

/s/ Carl L. Kennedy, II

Carl L. Kennedy, II

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