

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

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC., a Florida  
corporation,

CASE NO.: CACE 20-005993 (08)

Plaintiff,

v

CARL KENNEDY, individually,

Defendant.

**REQUEST TO PRODUCE**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff  
“Club”), pursuant to the Fla. R. Civ. P. 1.350, requests Defendant, CARL KENNEDY.  
(Defendant “Kennedy”) to produce the following documents for inspection and copying  
within thirty (30) days from the date of service, to the Law Office of Edward F. Holodak,  
P.A., 7951 SW 6 St., Suite 210, Plantation, FL 33324.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via  
eportal this 27th day of July 2020, to Carl L. Kennedy, II, [clktax@aol.com](mailto:clktax@aol.com).

\_\_\_\_\_/s/ Edward F. Holodak, Esq.,  
EDWARD F. HOLODAK, ESQ.  
Attorney for Plaintiffs  
Fla. Bar No.: 059234  
Edward F. Holodak, P.A.  
7951 SW 6<sup>th</sup> St., Suite 210  
Plantation, Fl. 33324  
Telephone: (954) 927-3436  
[pleadings@holodakpa.com](mailto:pleadings@holodakpa.com)

## **DEFINITIONS AND INSTRUCTIONS**

As used herein, the terms listed below are defined as follows:

1. Plaintiff or Club shall mean Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC.
2. Defendant or Kennedy shall mean Defendant Carl Kennedy.
3. For any documents produced, documents provided shall be completed and, unless privileged, un-redacted, submitted as found in the company's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with the corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

## **DOCUMENTS TO BE PRODUCED**

1. Copy of any and all retainer agreements or employment contracts between yourself and Wendy Hausmann, Esq.
2. Copy of any and all employment or retainer agreements between POMPANO SENIOR SQUADRON FLYING CLUB, INC (the "Club") and Wendy Hausmann.
3. Copy of any and all checks, written on any account belonging to the Club, to you for any reason during the past five (5) years.
4. Copy of any and all checks or other forms of payments from you to the Club for any reason during the past five (5) years.
5. Copy of any and all American Express statements which reflect payments from any account belonging to the Club on any American Express charge account owned in whole or in part by you.
6. Copy of any and all credit card statements which reflect payments from any account belonging to the Club on any credit cards owned in whole or in part by you.
7. Copy of any and all promissory notes entered into between the Club and Wendy Hausmann for any alleged loan made by Wendy Hausmann to the Club.
8. Copy of any and all notes, memorandum, agreements or other written material regarding an alleged loan by Wendy Hausmann to the Club.
9. Copy of any and all minutes of meetings of the Board of Directors of the Club at which the Board of Directors approved taking a loan from Wendy Hausmann.
10. Copy of any and all communications from Wendy Hausmann to you regarding a loan to the Club.
11. Copy of any and all communications from Wendy Hausmann to the Board of Directors regarding a loan to the Club.
12. Copy of any and all communications, letters, notes or other written documents from Wendy Hausmann to the Club regarding a loan to the Club.
13. Copy of any and all financial statements, bank records, accounting statements, regarding the Club generated or produced during the past seven (7) years.
14. Copy of any and all communications between yourself and Wendy Hausmann regarding rewriting, amending, or editing the By-Laws of the Club.

15. Copy of any and all communications between you and any third party regarding a loan from Wendy Hausmann to the Club.
16. Copy of any and all communications between you and any third party in which there are any discussions or communications regarding the Club reimbursing you for alleged expenses you paid on behalf of the Club.
17. Copy of any and all communications from the Club, its agents or attorneys to you regarding any matter for the last five (5) years.
18. Copy of any and all communications from you to the Club regarding any matter during the past five (5) years.
19. Copy of any and all communications from you to any other member of the Board of Directors regarding the operation of the Club while you served as a member of the Board of Directors.
20. Copy of any and all communications from any other member of the Board of Directors to you regarding the operation of the Club while you served as a member of the Board of Directors.