

IN THE CIRCUIT COURT OF
THE 17TH 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.

NOTICE OF SERVING INTERROGATORIES

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 answer the following interrogatories in writing and under oath within thirty (30) days from the date of service hereof.

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

_____/s/ Edward F. Holodak
EDWARD F. HOLODAK, ESQ.
Attorney for Plaintiff
Fla. Bar No. 059234
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DEFINITIONS

1. As used herein, please note the terms you, Defendant, or Kennedy refers to Defendant Carl Kennedy.
2. The term Plaintiff or Club refers to Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC.
3. As used herein, the term person means any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, firm, other business enterprise, government body, group of natural persons, or other entity.
4. As used herein, the terms Adocuments@ as well as Adocumentation@ shall mean any written, printed or typed matter in the possession, custody or control of Defendant, his agents and/or attorneys, including, but not limited to, all drafts and copies bearing notations or marks not found in the original, letters and correspondence, interoffice communications, surveys, reports, messages of any type, telephone messages, notices, instructions, minutes, summaries, notes, notes of meetings, transcripts, file folder markings, and any other organizational indicia, accounting records, accounting worksheets, tapes or other recordings, magnetic tapes, electronic data storage devices, electronic data communication devices, computers spreadsheets, computer printouts, or any other information filed or stored in any form in computers or otherwise and which can be retrieved, obtained, manipulated, or translated.
5. As used herein, the term relates to or relating to@ means referring to, concerning, documenting, responding to, containing, regarding, discussing, documenting, describing, reflecting, analyzing, constituting, disclosing, employing, defining, stating, explaining, summarizing, or in any way pertaining to.
6. As used herein, the terms and as well as or shall be construed both disjunctively and conjunctively so as to bring within the scope of each of these requests any information which otherwise might be construed to be outside the scope of any request.
7. The use of the singular form of any word includes the plural, and the use of the plural includes the singular.

INSTRUCTIONS

8. Your written response shall state, with respect to each interrogatory shall provide exact information, and if you cannot be exact, estimate the information and so indicate, with upper and lower boundaries.
9. To the extent you object, please state the reasons for the objection, including any claim of privilege, and the factual basis therefore to determine the sufficiency of the basis for the objection. If objection is made to part of an interrogatory, the part shall be specified with the reasons, and the remaining parts shall be answered.
10. If you are unable to answer all or part of an interrogatory, identify the person whom you believe has the knowledge or information which the interrogatory addresses.
11. These interrogatories are deemed to be continuing in nature, and in the event you become aware of or acquire in your possession, custody or control additional information responsive to the interrogatory, you are requested to produce promptly an amendment to the previously supplied interrogatory answer or response.
12. If in responding to these interrogatories you encounter any ambiguity in construing any interrogatory, instructions or definition, please set forth the matter deemed ambiguous and the construction used in responding thereto.

INTERROGATORIES

1. State the name, address and phone number of the person or persons answering or assisting with the preparation of the answer to these interrogatories and those people's relationship to Defendant Carl Kennedy.

2. State the date, time and location of the Board of Directors meeting of the Club at which the Board of Directors voted to authorize the Club taking a loan from Wendy Hausmann in the amount of \$10,000.00.

3. State all terms of the loan given by Wendy Hausmann to the Club \$10,000.00.

4. State each and every time the Club made a check payable to you, or to American Express, or to any other credit card company to reimburse you for expenses you allegedly paid on behalf of the Club.

5. For the past five (5) years, list each item of expense you paid on behalf of the Club for which you claim entitlement to reimbursement.

6. State the name of every Board of Director, that you know, who is aware that the Club took a \$10,000.00 loan from Wendy Hausmann.

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

CARL KENNEDY

The foregoing instrument was acknowledged before me, by means of _____ physical presence
or _____ online notarization, this _____ day of _____, 2020, by
_____ who is personally known to me or who produced
_____ as identification and who did take an oath.

Notary Public
My Commission Expires: