

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 FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO THE HONORABLE JUDGE OF THIS COURT:

I, Carl L. Kennedy, II, hereby respectfully request an extension to respond to Plaintiff's Interrogatories and Request to Produce Documents. I have previously filed a Motion to Dismiss Plaintiff's Complaint which is being heard on September 1, 2020. I have also previously filed a Motion to Compel, for Sanctions, for Protective Order and to Stay Proceedings Pending Plaintiff's Compliance with my Statutory Records Request, some of which records may/are/will be necessary and/or relevant to my providing responses to Plaintiff's discovery requests, and which Motion is also scheduled to be heard on September 1, 2020. Plaintiff will not be prejudiced nor will any irreparable harm occur if this Motion is granted.

I hereby certify that I sent a copy of this Motion via the e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com, on the 26th day of August, 2020.

Respectfully submitted,

/s/ Carl L. Kennedy, II
Carl L. Kennedy, II
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