

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.

PLAINTIFF'S RESPONSE TO DEFENDANT'S REQUEST FOR PRODUCTION

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., pursuant to the Fla. R. Civ. P. 1.350 file this Response to Defendant CARL KENNEDY'S Request for Production served on or about August 3, 2020.

1. All responsive documents have been sent directly to Defendant's counsel via email.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 2nd day of September 2020, to Wendy Hausmann, Esq., Hausmannw@aol.com

/s/ Edward F. Holodak
EDWARD F. HOLODAK, ESQ.
Fla. Bar No. 059234
Edward F. Holodak, P.A.
7951 SW 6th Street, Suite 210
Plantation, Florida 33324
Tel.: 954-927-3436
Pleadings@holodakpa.com

REQUESTS FOR PRODUCTION

1. Any and all retainer agreements with present counsel regarding the instant matter, as well as any and all statements for services rendered, evidence of payments made to said counsel, from you individually, from anyone on your behalf, from the corporation or entity, including, but not limited to, canceled checks, receipts and notes.

Copy of retainer agreement attached hereto. Plaintiff objects to the balance of this request to produce as attorney/client privilege, work product, irrelevant and immaterial until the Court determines prevailing party and Defendant's obligation to reimburse the Club its attorney fees and court costs.

2. Copies of all statements for all legal and any other professional services rendered to you in connection with or related to these proceedings and copies of all canceled checks in payment of such services, together with any contract or memoranda setting forth your agreement as to payment for such services, including memoranda, documents presented to shareholders, resolution and voting documents, minutes of meetings, all notices and all emails sent to or received by you from shareholders, Officers or member of the Board Directors regarding same, excluding attorney-client privileged documents/communications.

Plaintiff objects to this request to produce as attorney/client privilege, work product, irrelevant and immaterial until the Court determines prevailing party and Defendant's obligation to reimburse the Club its attorney fees and court costs

3. All documents concerning, and a copy of any new Bylaws or prospective Bylaws or Operational Rules or prospective Operational Rules proposed or promulgated for/by Plaintiff since February 12, 2020, including memoranda, documents presented to shareholders, resolution and voting documents, minutes of meetings, all notices and all emails sent to or received by you from shareholders, Officers or member of the Board Directors regarding same, excluding attorney-client privileged documents/communications.

Attached and see #5

4. A list of all shareholders of the corporation as of February 12, 2020, and as of the date of your responses to this Request, including each individual's name, address, telephone number and email address.

Objection – irrelevant, immaterial, not meant to lead to discoverable information.

5. All documents and communications, which discuss with the shareholders or amongst the Officers or Board of Directors, the hiring/retaining of Attorney Holodak, including memoranda, documents presented to shareholders, resolution and voting documents, minutes of meetings, all notices and all emails sent to or received by you from shareholders, as well as any Officer or member of the Board of Directors, regarding same.

Minutes of meeting and resolution attached hereto.

6. All documents and communications since January 1, 2019 in your possession, custody or control, excluding attorney-client privileged documents or communications, which discuss me or relate in any way to my position as (now former) Treasurer or a lawsuit against me, including memoranda, documents presented to shareholders, resolution and voting documents, minutes of meetings, all notices and all emails sent to or received by you from shareholders, as well as any Officer or member of the Board of Directors, regarding same.

Minutes of meeting and resolution attached hereto.

7. All documents and communications since January 19, 2019, which were sent by or received by any Officer or member of the Board of Directors after February 12, 2020, to or from any Officer or member of the Board of Directors which existed immediately prior to February 12, 2020, which discuss me or a lawsuit against me, or relate in any way to my position as (now former) Treasurer, including memoranda, documents presented to shareholders, resolution and voting documents, minutes of meetings, all notices and all emails sent to or received by you from shareholders, as well as any Officer or member of the Board of Directors, regarding same.

Attached.

8. All documents that you will introduce at trial.

Unknown at this time.

9. All documents consulted by you in answering Interrogatories.

See documents attached in response to request numbers 1 – 7.

10. All documents which are in whole or in part the basis of your Answers to Interrogatories.

See answer to number 9

11. All documents identified in your Answers to Interrogatories.

See answer to number 9.