

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/Counter-Defendant,
and

Case No.: CACE 20-005993
Division (8)

CARL L. KENNEDY

Defendant/Counter-Plaintiff.

DEFENDANT/COUNTER-PLAINTIFF'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

CARL L. KENNEDY, II, Defendant/Counter-Plaintiff, requests pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff/Counter-Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, produce to me the following items for copying and inspection the originals or exact copies of all of the documents, 30 days from the date hereof, at 2929 S. Ocean Blvd., #510, Boca Raton, FL 33432.

Plaintiff/Counter-Defendant should comply with the mandates of Florida Rules of Procedure 1.350, which provide in pertinent part as follows:

Rule 1.350(b): "The party to whom the request is directed shall file a written response within 30 days after service of the request.... For each item or category the response shall state that inspection and related activities will be permitted as requested unless the request is objected to, in which event the reasons for the objection shall be stated. If an objection is made to part of an item or category, the part shall be specified. When producing documents, the producing party shall either produce them as they are kept in the usual course of business or shall identify them to correspond with the categories in the request."

The following items requested should be construed with the preliminary definitions set forth below:

A. Unless otherwise indicated, the term "documents" shall mean the original (and any copy with notations or addenda not on the original) of any written, printed, typed, photocopied, photographic, and recorded matter of any kind or character, and any recorded material, however produced or reproduced, including without limiting the generality of the foregoing, all drafts, contracts, diaries, appointment books, calendars, desk pads, correspondence, communications, telegrams, teletypes, memoranda, notes, studies, reports, minutes of meetings, invoices, credits, debits, transcripts, inventories, drawings, graphs, charts, photographs, films, microfilms, slides, magnetic and electronic recordings, sound recordings, lists, minutes, checks and entries in books of account relating or in any way referring to the subject matter of this request.

B. Where a particular document is described, e.g., agreement, minutes, etc., such description shall be deemed to include any and all drafts of such documents.

C. If any document requested herein is not produced due to a claim of privilege, each such document should be identified by date, number of pages, author, recipients, and the nature of the privilege so claimed.

1. All documents reflecting PBFC's current liabilities, including invoices, billing statements, collection letter(s), the result of any lawsuit(s), and any written demand communications (letters or emails).
2. Statements of any and all credit card(s) used to pay for PBFC expenses since February 12, 2020, regardless of the name in which the credit card is held.
3. Copies of any and all documents related to payments made to any member or former member of PBFC since February 12, 2020, including loan or "IOU" documents, copies of checks and any other form of payment.

I hereby certify that on the 25th day of October, 2020, I sent a copy of the foregoing via the Florida e-portal to Edward F. Holodak, Esquire at pleadings@holodakpa.com.

BY:

/s/ Carl L. Kennedy, II
Carl L. Kennedy, II
2929 S. Ocean Blvd., #510
Boca Raton, FL 33432
304-552-0206
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