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

Plaintiff,

V

CARL KENNEDY, individually,

Defendant.

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN AND FOR ROWARD COUNTY FLORIDA

CASE NO.: CACE 20-005993 (08)

PLAINTIFF'S OBJECTION TO DEFENDANT'S REQUEST FOR JUDICIAL NOTICE

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), pursuant to §§ 90.202 and 90.203 <u>Fla. Stat.</u>, by and through its undersigned counsel, files this Objection to Defendant CARL KENNEDY'S (Defendant "Kennedy") Request to take Judicial Notice and says:

- 1. On or about October 26, Defendant Kennedy requested this Court to take judicial notice of a small claims case between Lloyd David Hill and Graham David Hill and Plaintiff Club.
- 2. Defendant Kennedy did not identify any specific pleadings in his request to this Court to take judicial notice, nor did Defendant Kennedy, as required by the above two (2) Florida Statutes, provide this Court with any details as to the relevancy, materiality, or connection between the items which Defendant Kennedy requested judicial notice and the case before this Court.
- 3. Defendant Kennedy's failure to comply with Florida law prevents this Court from properly taking judicial notice of the requested documents and as such, Plaintiff

Club moves this Court for an Order denying Defendant Kennedy's request for judicial notice, an award of court costs and attorney fees, and any further relief that this Court deems just and equitable.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 29th day of October, 2020, to Carl L. Kennedy, II, clktax@aol.com.

/s/Edward F. Holodak EDWARD F. HOLODAK, ESQ. Attorney for Plaintiff Fla. Bar No.: 059234 Edward F. Holodak, P.A. 7951 SW 6th Street, Ste. 210 Plantation, FL 33324

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