

IN THE CIRCUIT COURT OF  
THE 17<sup>TH</sup> 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  
SUPPLEMENTAL MOTION TO COMPEL**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), by and through its undersigned counsel, files this Response to Defendant CARL KENNEDY'S (Defendant "Kennedy") Supplement Motion to Compel filed on or about October 24, 2020, and says:

1. In his Supplement Motion to Compel, Defendant Kennedy alleges that Plaintiff Club has certain "deficiencies with respect to my shareholder record request."
2. While Plaintiff Club disputes any alleged deficiencies, the issue is irrelevant and moot before this Court. Defendant Kennedy sent by U.S. Mail a request pursuant to Chapter 607 Fla. Stat. for records of a corporation. Defendant Kennedy did not submit a request to produce pursuant to Rule 1.350, Fla. R. Civ. P. in this case for any such records and as such, this Court has no jurisdiction over the parties or the subject matter of Defendant Kennedy's Supplemental Motion to Compel.
3. As Plaintiff Club as pointed out to this Court in previous responses, while Defendant Kennedy is acting pro se, Florida law requires that Defendant Kennedy

