

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 (o8)

Plaintiff,

v

CARL KENNEDY, individually,

Defendant.

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S DISCOVERY**

Plaintiff, Pompano Senior Squadron Flying Club, Inc. (Plaintiff "Club"), by and through their undersigned counsel, files this Motion for Extension of Time to Respond to Defendant's, Carl L. Kennedy, II (Defendant "Kennedy") Second Request for Production, Second Interrogatories, and Expert Interrogatories served on or about October 25, 2020, and says:

1. Defendant Kennedy served Plaintiff Club with a Second Request for Production of Documents, Second Interrogatories, and Expert Interrogatories on or about October 25, 2020.

2. Based upon the filing date, answers to the discovery are due November 25, 2020 – Thanksgiving.

3. Based upon the holiday and the extensive discovery requests, Plaintiff Club requires an additional fifteen (15) days to respond to the discovery.

4. The parties will not be prejudiced by the granting of this relief.

5. The matter is not set for trial, and this motion is not being made to delay or harass.

WHEREFORE, Plaintiff Club moves this Court for an Order granting an additional fifteen (15) to respond to Defendant Kennedy's discovery requests and any other relief this Court deems just and equitable.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 25th day of November, 2020, to Carl L. Kennedy, II, clktax@aol.com

/s/ Edward F. Holodak
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