

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
SECOND REQUEST FOR PRODUCTION**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., pursuant to the Fla. R. Civ. P. 1.350 file this Response to Defendant's Second Request for Production served on or about October 25, 2020.

1. All responsive documents have been sent directly to Defendant.
2. All responsive documents have been sent directly to Defendant.
3. None.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 18th day of December, 2020, to Carl L. Kennedy, II, clktax@aol.com.

/s/ Edward F. Holodak

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REQUESTS FOR PRODUCTION

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).

Attached.

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.

Attached.

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.

None.