

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
NOTICE OF PLAINTIFF'S FALSE CERTIFICATION AND FAILURE TO
PROVIDE DOCUMENTS RESPONSIVE TO SECOND REQUEST FOR
DOCUMENTS**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (Plaintiff "Club"), files this Response to Defendant CARL KENNEDY (Defendant "Kennedy")'s Notice of Plaintiff's False Certification and Failure to Provide Documents Responsive to Second Request for Documents.

1. On or about December 18, 2020, Plaintiff Club Responded to Defendant Kennedy's Second Request to Produce and provided him online access to the responsive documents.

2. In response thereto, on or about December 21, 2020 Defendant Kennedy filed a Notice of Plaintiff's False Certification and Failure to Provide Documents Responsive to Second Request for Documents. In said Notice, Defendant Kennedy incorrectly informed this Court that Plaintiff Club failed to provide the documents.

3. In fact, Plaintiff Club provided Notice to Defendant Kennedy's primary email, which Defendant Kennedy registered with the e filing system, access to the documents. Defendant Kennedy was apparently using an alternate email to attempt to gain access to the documents. Accordingly, Plaintiff Club's certification of responsive

documents is correct, and Defendant Kennedy's Notice of Plaintiff's False Certification and Failure to Provide Documents Responsive to Second Request for Documents is once again a pleading intended to delay and harass Plaintiff Club.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 21st 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.