

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 SECOND REQUEST FOR PRODUCTION

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., by and through its undersigned counsel, pursuant to Rule 1.350, Fla. R. Civ. P., requests Defendant, CARL KENNEDY, to produce the following documents for inspection and copying within thirty (30) days from the date of serve, to the Law Office of Edward F. Holodak, P.A., 7951 SW 6 St., Suite 210, Plantation, FL 33324.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 11th day of February, 2021, to Carl L. Kennedy, II, clktax@aol.com.

/s/ Edward F. Holodak
Edward F. Holodak, Esquire
Attorney for Plaintiff
Fla. Bar No. 059234
EDWARD F. HOLODAK, P.A.
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DEFINITIONS AND INSTRUCTIONS

As used herein, the terms listed below are defined as follows:

1. The term Defendant refers to Defendant CARL L. KENNEDY.
2. The term Plaintiff refers to POMPANO SENIOR SQUADRON FLYING CLUB, INC.
3. For any documents produced, documents provided shall be completed and, unless privileged, un-redacted, submitted as found in the company's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with the corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

DOCUMENTS TO BE PRODUCED

1. Copy of any and all electronic backup data files for all accounting software utilized by you during your term as Treasurer for the Club for all accounting. Tax and financial record keeping for the Club.
2. Copy of any and all workbooks, ledgers, accounts, or written records utilized by you to prepare the financial statements, tax returns and account statements for the Club during your time as Treasurer for the Club.
3. Copies all contracts with the bookkeepers, tax professionals, or accountants which the Club entered to perform bookkeeping, preparation of financial statements or preparation of tax returns during your time as Treasurer of the Club.