

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

POMPANO SENIOR SQUADRON FLYING CLUB, INC.
(aka POMPANO BEACH FLYING CLUB)

Plaintiff/Counter-Defendant,

and

Case No.: CACE 20-005993
Division (8)

CARL L. KENNEDY

Defendant/Counter-Plaintiff.

RESPONSES TO PLAINTIFF'S AMENDED REQUEST FOR ADMISSIONS

I, Carl L. Kennedy, II, Defendant/Counter-Plaintiff, hereby respond to Plaintiff's Amended Request for Admissions served to me on February 9, 2021 as follows:

5. Denied because Exhibit #1 contains and combines 2 Aircraft Security Agreements and 2 Promissory Notes.

6. Denied because Exhibit #2 contains and combines 2 Aircraft Security Agreements and 2 Promissory Notes.

7. I admit Exhibit #3 is a copy of a true and genuine document executed to ensure and secure Plaintiff's repayment of a \$100,000.00 loan I obtained from Sunwood, Inc., in 2018, on behalf of the Club and in my capacity as Treasurer, which was used for Club-related purposes and expenses, including but not limited to the purchase of A/C N2921S.

8. I admit Exhibit #4 is a copy of a true and genuine document executed to ensure and secure Plaintiff's repayment of a \$100,000.00 loan I obtained from Mr. Charly Guzman in 2017, on behalf of the Club and in my capacity as Treasurer, which was used for Club-related purposes and expenses, including but not limited to reducing outstanding Club debt and obligations, as well as refurbishing A/C N7696F.

I hereby certify that I sent a copy of the foregoing via the e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com, on the 11th day of March, 2021.

Respectfully submitted,

/s/ Carl L. Kennedy, II

Carl L. Kennedy, II

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