

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.

THIRD SET OF INTERROGATORIES
DIRECTED TO PLAINTIFF/COUNTER-DEFENDANT

CARL L. KENNEDY, II, Defendant and Counter-Plaintiff, hereby propounds the following Interrogatory to Plaintiff/Counter-Defendant and requests that the following Interrogatory be answered under oath or affirmation as to its truthfulness within thirty (30) days, in accordance with the Florida Rules of Civil Procedure:

1. With respect to the allegation contained in paragraph #3 of Plaintiff's Motion to Appoint Special Magistrate" filed March 25, 2021, in which it is alleged that Plaintiff has "unturned over \$340,000 of unaccounted for monies", state what is meant by the terms (a) "unturned" and (b) "unaccounted for" as used in the allegation.

2. Specifically identify and describe each component that comprises the \$340,000 of alleged "unaccounted for monies" (hereinafter in this interrogatory referred to as "AUFM") contained in paragraph #3 of Plaintiff's Motion to Appoint Special Magistrate filed March 25, 2021, by stating:

- a. the date and the amount of the transaction(s) or event(s) giving rise to the AUFM;
- b. the type and description of all documents which show the AUFM, including but not limited to checks, receipts, invoices, contracts, journals, ledgers, spreadsheets, notes, statements, books, correspondence, records and agreements;
- c. the names, addresses and telephone numbers of each person who "unturned" the AUFM;

- d. the method(s) used by each person identified in 2(c) to “unturn” the AUFM;
- e. the names, addresses and telephone numbers of all individuals who identified, determined, designated, declared or represented the money to be “unaccounted for”, and as to each, identify all documents upon which they relied in making such identification, determination, designation, declaration or representation, including the date, the issuer of the document and the type of document;
- f. the method(s) used by each person identified in 2(e) to determine, designate, declare or represent the money to be AUFM;
- g. the names, addresses and telephone numbers of the creator(s) of all documents in which the existence of the AUFM is shown to exist or to have existed, and the date of issue of such documents;
- h. the names, addresses and telephone numbers of all persons identified in 2(c), 2(e) and 2(g) now having, or any time since February 12, 2020 had, possession, custody or control of the document(s) from which the AUFM was “unturned”; and
- i. all prior and current location(s) of any existing AUFM, including the names, addresses and telephone numbers of any individual, business or institution where the AUFM is now, and where the AUFM is known to have ever been, located.

I hereby certify that on the 8th day of May, 2021, I sent a copy of the foregoing via the Florida e-portal to Edward Holodak, Esquire at pleadings@holodakpa.com.

BY:

/s/ Carl L. Kennedy, II
Carl L. Kennedy, II
2929 S. Ocean Blvd., #510
Boca Raton, FL 33432
304-552-0206
E-Mail Address: clktx@aol.com