

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.

**NOTICE OF PLAINTIFF'S FALSE CERTIFICATION
OF SERVICE OF MOTION FOR PROTECTIVE ORDER**

Defendant/Counter-Plaintiff, Carl L. Kennedy, II, by his undersigned counsel,
hereby respectfully states as follows:

1. Plaintiff filed a Motion for Protective Order on **June 4, 2021**. However, the "Certificate of Service" on the Motion for Protective Order certifies it was served via the e-portal on **June 1, 2021**.
2. The undersigned contacted counsel for Plaintiff to request a correction of this error. See attached at Exhibit A.
3. Plaintiff has failed and refused to correct the false certification contained in its Motion for Protective Order.

I hereby certify that I sent a copy of the foregoing via the e-portal to Edward F. Holodak, Esquire, on the 19th day of June, 2021.

Respectfully submitted,

/s/ Wendy A. Hausmann
Wendy A. Hausmann, Esquire
Attorney for Defendant
20283 State Road 7, Suite #400
Boca Raton, Florida 33498
(561) 477-5353
Fla. Bar No. 304300
E-service: hausmannw@aol.com
WhausmannLaw@gmail.com

From: hausmannw@aol.com
To: Edward@holodakpa.com

Cc: clktax@aol.com,

Subject: P.B.C.V. Kennedy - False Certification

Date: Wed Jun 16, 2021 7:44 pm

Attachments: Motion for Protective Order - Pages 1 to 46.pdf (9912K)

Ed:

In locating (so as to review) Plaintiff's Motion for Protective Order, I have noticed the following.

Please see below the Notice of Service of Court Document which establishes that Plaintiff's Motion for Protective Order was not filed and served to me via the e-portal on June 3, 2021, as the "certificate of service" on your Motion for Protective Order certifies, but was actually filed and served by Plaintiff on June 4, 2021. I kindly acknowledge this error.

Thank you,
Wendy A. Hausmann

NOTICE: This e-mail message and any attachment to this e-mail message contains confidential information that may be legally privileged. If you are not the intended recipient, you must not review, retransmit, convert to hard copy, copy, use or disseminate this e-mail or any attachments to it. If you have received this e-mail in error, please notify us immediately by return e-mail or by telephone at 561.477.5353 and delete this message. Please note that if this e-mail message contains a forwarded message or is a reply to a prior message, some or all of the contents of this message or any attachments may not have been produced by THE LAW OFFICES OF WENDY A. HAUSMANN, 20283 STATE ROAD 7, SUITE 400, BOCA RATON, FL 33498, E-MAIL: hausmannw@aol.com.

-----Original Message-----

From: eservice@myflcourtsaccess.com

Sent: Fri, Jun 4, 2021 2:27 pm

Subject: SERVICE OF COURT DOCUMENT, CASE NUMBER 062020CA005993AXXXCE POMPANO SENIOR SQUADRON FLYING VS POMPANO SENIOR SQUADRON FLYING - Part 1 of 2

Notice of Service of Court Documents

Filing Information

Filing #: 128134612
Filing Time: 06/04/2021 02:26:54 PM ET
Filer: Edward F Holodak 954-927-3436
Court: Seventeenth Judicial Circuit in and for Broward County, Florida
Case #: 062020CA005993AXXXCE
Court Case #: CACE-20-005993
Case Style: POMPANO SENIOR SQUADRON FLYING VS POMPANO SENIOR SQUADRON FLYING

Documents

Title	File
Motion for Protective Order	Club's Motion for Protective Order - _Redacted.pdf

E-service recipients selected for service:

Name	Email Address
Edward F Holodak	pleadings@holodakpa.com edward@holodakpa.com
WENDY A HAUSMANN	HAUSMANNW@AOL.COM whausmannlaw@gmail.com

E-service recipients not selected for service:

Name	Email Address
Carl Lemley Kennedy II	CLKTax@aol.com mail@goard.com
Jeffrey B Lampert	lampertpleadings@gmail.com
N/A	saltlife171@gmail.com

"A"