

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.

THIRD REQUEST FOR ADMISSIONS

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., (Plaintiff "Club") pursuant to the Fla. R. Civ. P. 1.350, requests Defendant CARL L. KENNEDY, II (Defendant "Kennedy") to respond to the Request for Admissions within thirty (30) days from the date of service.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 16th day of September 2021, to Scott Kalish, Esq., The Law Offices of Scott J. Kalish, 5255 N. Federal Highway, Suite 325, Boca Raton, FL 33487, scott@scottjkalishlaw.com.

/s/ Edward F. Holodak
Edward F. Holodak, Esquire
Attorney for Plaintiff
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REQUEST FOR ADMISSIONS

1. Admit or deny that the loan you obtained from Sunwood, Inc., in the amount of \$100,000, was an unsecured loan.
2. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount of \$100,000, the Club did not enter into a security agreement with Sunwood, Inc.
3. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount \$100,000, the Club did not grant Sunwood, Inc. a lien on any of the Club's aircrafts.
4. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount of \$100,000, the Club did not enter into a chattel mortgage with Sunwood, Inc.
5. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount of \$100,000, the Club did not sign a promissory note in favor of Sunwood, Inc.
6. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount of \$100,000, the members of the Club did not vote to approve such loan.
7. Admit or deny that at the time you obtained the loan from Sunwood, Inc., in the amount of \$100,000, the Board of Directors of the Club did not vote to approve such loan.
8. Admit or deny that the loan you obtained from Charly Guzman, in the amount of \$100,000, was an unsecured loan.
9. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount of \$100,000, the Club did not enter into a security agreement with Charly Guzman.
10. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount \$100,000, the Club did not grant Charly Guzman a lien on any of the Club's aircrafts.
11. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount of \$100,000, the Club did not enter into a chattel mortgage with Charly Guzman

12. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount of \$100,000, the Club did not sign a promissory note in favor of Charly Guzman.
13. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount of \$100,000, the members of the Club did not vote to approve such loan.
14. Admit or deny that at the time you obtained the loan from Charly Guzman, in the amount of \$100,000, the Board of Directors of the Club did not vote to approve such loan.