

IN THE CIRCUIT COURT OF
THE 17TH JUDICIAL CIRCUIT IN
AND FOR BROWARD
COUNTYFLORIDA

POMPANO SENIOR SQUADRON
FLYING CLUB, INC., a Florida
corporation,

CASE NO.:CACE 20-005993 (08)

Plaintiff,

v

CARL KENNEDY, individually,

Defendant.

**PLAINTIFF'S RESPONSE TO DEFENDANT'S
SHAREHOLDER REQUEST FOR PRODUCTION**

Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., pursuant to Rule 1.350, Fla.R.Civ.P. files this Response to Defendant's Shareholder Record Request sent on or about April 30, 2021 and says:

1. Attached
2. Attached
3. Attached
4. Attached
5. Attached
6. Attached
7. Objection privileged, work product, ongoing litigation.
8. Objection privileged, work product, ongoing litigation.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via eportal this 11th day of October 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
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REQUESTS FOR PRODUCTION

1. All documents reflecting PBFC's current liabilities, including invoices, billing statements, collection letter(s), the result of any lawsuit(s), and any written demand communications (letters or emails).

Attached.

2. Statements of any and all credit card(s) used to pay for PBFC expenses since February 12, 2020, regardless of the name in which the credit card is held.

Attached.

3. Copies of any and all documents related to payments made to any member or former member of PBFC since February 12, 2020, including loan or "IOU" documents, copies of checks and any other form of payment.

None.