

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

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

Plaintiff,

v.

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

CARL L. KENNEDY, II

Defendant

MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

DEFENDANT, CARL L. KENNEDY, II ("Defendant"), by and through the undersigned counsel, hereby requests additional time to file a response to Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., ("Plaintiff") Second Amended Complaint, filed herein and in support states as follows:

1. On December 1, 2021 Plaintiff, filed its Second Amended Complaint.
2. A response to Plaintiff's Second Amended Complaint is due on December 20, 2021.
3. On December 20, 2021, Plaintiff filed a motion to amend its complaint, and file its Third Amended Complaint.
4. On December 20, 2021, Plaintiff and Defendant submitted an Agreed Order to the Court permitting Plaintiff to file its Third Amended Complaint and providing Defendant twenty (20) days to file an answer to Plaintiff's Third Amended Complaint.
5. As of this Motion the Court has not executed the above Agreed Order.
6. As such the Defendant requests an extension to file a response to Plaintiff's Second Amended Complaint, until the Court enters its Order permitting Plaintiff to file its Third Amended Complaint.

WHEREFORE, DEFENDANT CARL L. KENNEDY, II respectfully requests that this Honorable Court enter an Order extending the time to file a response until the Court enters its Order permitting Plaintiff to file its Third Amended Complaint together with any other relief this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of December 2021 a copy of the foregoing was e-filed and delivered to Edward F. Holodak, Esq., 7951 SW 6th St., Suite 210, Plantation, FL 33324, pleadings@holodakpa.com.

THE LAW OFFICES OF SCOTT J. KALISH, PLLC.

/s/ Scott J. Kalish

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