

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

SUNWOOD, INC.,

CASE NO. 21-003202 CACE 12

Plaintiff,

vs.

POMPANO SENIOR SQUADRON FLYING
CLUB, INC.,

Defendant.

/

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff, by and through his undersigned counsel and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, requests that the Defendant produce the following documents within thirty (30) days of the date of service hereof.

DEFINITIONS

For the purpose of this Request for Production of Documents, the following definitions shall apply unless otherwise specifically indicated:

1. The word "document(s)" shall refer to all written or graphic material and all copies containing any additional matter, however, produced or reproduced, of any kind and description in the actual or constructive possession, custody, care or control of Defendant, which pertain directly or indirectly, in whole or in part, either to any of the subjects listed below or to any others matters relevant to this action, or which are themselves listed below as specific documents, including, but not limited to, originals (or copies where originals are unavailable) of correspondence, papers, books pamphlets, periodicals, accounts, letters, photographs, objects, microfilm, telegrams, notes, or sound

recordings or other memorials of any type of personal or telephone conversations or meetings or conference (including, but not by way of limitation, telephone bills and long distance telephone call charge slips); memoranda, interoffice communications, records, reports, studies, written forecasts, projections, analyses, estimates, plans, drawings, schematic and other diagrams, specifications, advertising drafts, copy, tear sheets and flyers, contracts, options, licenses, agreements, purchase orders, bills of lading, warehouse receipts, acknowledgment forms, quotations, requests for quotations, quotations files, invoices, ledgers, books of accounts, journals, vouchers, bank checks, charge slips, deposit slips, reports, account reports, hotel charges, receipts, papers, including working papers; drafts, charts, graphs, indexes, statistical records, cross-sheets, abstracts of binds, stenographers' notebooks, calendars, appointment books, diaries, job sheets, job or transaction files, data sheets, data processing cards and tape and computer printouts.

2. "And" or "Or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each request all responses which might otherwise be construed to be outside its scope.

3. The term "Defendant," "you" and "your" means the party or parties to which this request is addressed, including agents, attorneys and all other persons acting or purporting to act on your behalf.

4. Any reference herein to an entity other than a natural person includes its divisions, departments, subsidiaries, affiliates, predecessors, partners, present or former officers, directors, shareholders, owners, agents, attorneys, and all other persons acting or purporting to act on its behalf, as well as each partnership in which it is a partner.

DOCUMENTS TO BE PRODUCED

1. All bank records for the bank account into which the check attached to the Plaintiff's

Complaint was deposited from the date of said deposit and for ninety days thereafter.

2. All records of any meeting of the Board of Directors of the Defendant from June 1, 2018, to December 31, 2020.
3. All records of your purchase of any airplane with the registration N29215 or N2921S,
4. Any documents that support any affirmative defense raised by you.
5. Any other documents upon which you intend to rely in your defense of the Complaint filed against you in this case.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via email this March 26, 2021, to Edward Holodak, Esq., at pleadings@holodakpa.com.

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By: /s/ Dane T. Stanish
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