

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

SUNWOOD, INC.,

Plaintiff,

vs.

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Defendant.

Case No.: CACE 21 – 003202 (12)

DEFENDANT’S REQUEST FOR PRODUCTION

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC., (Defendant “Club”) by and through its undersigned counsel, pursuant to Rule 1.350, Fla. R. Civ. P., requests Plaintiff, SUNWOOD, INC., (“Sunwood”) to produce the following documents for inspection and copying within thirty (30) days from the date of serve, to the Law Office of Edward F. Holodak, P.A., 3326 NE 33 Street, Fort Lauderdale, FL 33308.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via eportal this 2nd day of June 2021 to Dane Stanish, Esq., stanishd@gmail.com.

/s/ Edward F. Holodak, Esq.,

EDWARD F. HOLODAK, ESQ.
Attorney for Defendant
Fla. Bar No.: 059234
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Plantation, Fl. 33324
Telephone: (954) 927-3436
pleadings@holodakpa.com

DEFINITIONS AND INSTRUCTIONS

As used herein, the terms listed below are defined as follows:

1. The term Plaintiff refers to SUNWOOD, INC.
2. The term Defendant and Club refers to POMPANO SENIOR SQUADRON FLYING CLUB, INC.
3. For any documents produced, documents provided shall be completed and, unless privileged, un-redacted, submitted as found in the company's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with the corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

DOCUMENTS TO BE PRODUCED

1. Copy of any and all checks, both front and back, or any document evidencing payment by Plaintiff to Defendant of the alleged One Hundred Thousand Dollar (\$100,000) loan sued for herein (the "Loan").
2. Copy of any and all receipts, notes or any document from Defendant evidencing payment of the Loan to Club.
3. Copy of all promissory notes, loan agreement or other another document evidencing the Loan from Plaintiff to Club.
4. Copies of all communications, including text messages, emails or other electronic media between Plaintiff and the Club, or any officer, director or member of Club, regarding the Loan, including but not limited to, applications, requests for the Loan, credit checks, repayment terms, etc.
5. Copies all demands from Plaintiff to the Club for repayment of the loan, whether sent by Plaintiff, its agents or attorneys.
6. Copies of any minutes of Club's meetings, either Board of Directors or Members', in which the Loan was discussed in any manner.
7. Copy of any document, including emails, text messages, etc., evidencing the Club's need or reasons for requesting or accepting the Loan.
8. Copy of any communications between Plaintiff, its agents, employees, directors, shareholders or attorneys and Carl Kennedy regarding the alleged loan in any manner.
9. Copy of any communications between Plaintiff, its agents, employees, directors, shareholders or attorneys and Wendy Hausmann, Esq., regarding the alleged loan in any manner.
10. Copy of any communications between Plaintiff, its agents, employees, directors, shareholders or attorneys and Wendy Hausmann, Esq., regarding Carl Kennedy as it relates to the Club in any manner.