

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 PETITION FOR ORDER TO SHOW CAUSE

Plaintiff, through its undersigned counsel, petitions this Court for an Order to Show Cause why subpoenaed witness Paul K. Sanchez, should not be held in contempt of court for failing to provide discovery and for sanctions and as grounds therefore states:

1. On May 11, 2021, the Plaintiff served witness Paul K. Sanchez with a Subpoena Duces Tecum requesting production of a recording.
2. Despite having been served, Mr. Sanchez have failed to provide a response to the Subpoena Dices Tecum.
3. The Plaintiff is entitled to the discovery sought.
4. Rule 1.380(a)(4), Fla.R.Civ.P., states that “the court **shall** require the party or deponent whose conduct necessitated the motion ... to pay to the moving party the reasonable expenses incurred in obtaining the order that may include attorneys’ fees....” *See Summit Chase Condo. Ass’n, Inc., v. Protean Investors, Inc.*, 421 So.2d 562 (Fla. 3d DCA 1982).
5. The undersigned certifies that he has made a good faith effort to obtain the discovery

without court action.

WHEREFORE, Plaintiff respectfully requests that this Court grant his Petition for Order to Show Cause, order the witness, Paul K; Sanchez, to provide a response to the outstanding discovery and award the Plaintiff its reasonable attorney's fees.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via email this June 23, 2021, to Edward F. Holodak, Esq., through the Court's efilng portal, and by U.S. Mail to Paul K; Sanchez, 10643 Shore Drive, Boca Raton, FL 33428.

LAW OFFICES OF DANE STANISH, P.A.
3475 Sheridan Street, Suite 209
Hollywood, FL 33021
Telephone (954) 923-0524
Facsimile (954) 212-0770
Stanishd@gmail.com

By: /s/ Dane T. Stanish
Dane T. Stanish
Florida Bar # 931993