

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

SUNWOOD, INC.,

CASE NO. 21-003202 CACE

Plaintiff,

vs.

POMPANO SENIOR SQUADRON FLYING
CLUB, INC.,

Defendant.

/

MOTION TO AMEND COMPLAINT

Plaintiff, Sunwood, Inc., through its undersigned counsel, moves this Court for an Order permitting it to amend its Complaint, and states:

1. The Plaintiff's proposed Amended Complaint has been filed contemporaneously herewith.
2. Rule 1.190, Fla.R.Civ.P., allows for amendments to be "given freely when justice so requires.
3. The Amended Complaint adds a claim for unjust enrichment. Discovery in this case has led the Plaintiff to believe that it is entitled to recover under this cause of action. The remainder of the pleading remains the same.

WHEREFORE, the Plaintiff respectfully requests that this Court grant this Motion to Amend and allow the proposed Amended Complaint to stand as filed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via email this September 27, 2021, to Edward F. Holodak, Esq., at pleadings@holodakpa.com and Carolyn

N. Budnik, Esq., at carolyn@cbudlaw.com.

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By: /s/ Dane T. Stanish
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