

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

SUNWOOD, INC.,

Plaintiff,

Case No.: CACE 21 – 003202 (12)

vs.

POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Defendant

\_\_\_\_\_  
POMPANO SENIOR SQUADRON  
FLYING CLUB, INC.,

Third-Party Plaintiff,

v.

CARL L. KENNEDY, II

Third-Party Defendant.  
\_\_\_\_\_

**REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant/Third-Party Plaintiff, POMPANO SENIOR SQUADRON FLYING CLUB, INC., by and through its undersigned counsel, (the “Club”) pursuant to Rule 1.350, Fla. R. Civ. P., requests Third-Party Defendant, CARL L. KENNEDY, II (“Kennedy”) 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 33rd Street, Fort Lauderdale, FL 33308, [edward@holodakpa.com](mailto:edward@holodakpa.com).

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been sent via eportal this 11th day of November 2021 to Dane Stanish, Esq., [stanishd@gmail.com](mailto:stanishd@gmail.com) and to Carl L. Kennedy, II, [clktax@aol.com](mailto:clktax@aol.com)

\_\_\_\_\_/s/ Edward F. Holodak, Esq.,  
EDWARD F. HOLODAK, ESQ.  
Fla. Bar No.: 059234  
Edward F. Holodak, P.A.  
3326 NE 33 Street  
FT. Lauderdale, Fl. 33308  
Telephone: (954) 927-3436  
[pleadings@holodakpa.com](mailto:pleadings@holodakpa.com)

## **DEFINITIONS AND INSTRUCTIONS**

“Third-Party Plaintiff” or “Plaintiff” or “Club” shall mean POMPANO SENIOR SQUADRON FLYING CLUB, INC.

“You,” “Your” or “Defendant” or “Third-Party Defendant” shall mean CARL L. KENNEDY, II and includes his agents, assignees, representatives, and all other individuals acting on his behalf.

“The Loan” and “Loan” refers to the money allegedly given by Plaintiff Sunwood to Defendant Club that is the subject matter of this lawsuit.

The term “anyone acting on your behalf” includes, but is not limited to, your attorneys, investigators, and representatives whether hired or appointed by you.

The terms “individual” or “individuals” and “person” or “persons” shall mean each and every individual, corporation, partnership, association, joint venture, firm, group, cooperative, governmental department, and agency (federal, state, or local), division, subsidiary, social or political organization, or any other entity cognizable at law, whether real or juridical or incorporated or unincorporated.

The terms “records,” “documents,” “documentation,” and “communications” are used in the broad sense and include, but are not be limited to, the following items within the possession, custody, or control of Defendant or known by Defendant to exist, whether such items are typed, printed, drawn, sketched, photographed, recorded, or written by hand: contracts; correspondence; telegrams; memoranda; statements; records; reports; books; summaries and/or records of conversations; summaries and/or records of personal conversations; diaries; forecasts; orders; bills; invoices; checks; statistical statements; books or accounts; studies; graphs; charts; work papers; indices; data sheets; data processing cards; analytical records; minutes and/or records of meetings and conferences; reports and/or summaries of entries; reports and/or opinions of consultants; appraisals; records; reports and/or summaries of negotiations; brochures; lists; periodicals; pamphlets; circulars; trade letters; newspaper clippings; press releases; notes; projections; working papers; photographs; drawings; tape recordings; and all other written, printed, recorded, or graphic matter, photographic matter, or other matter, however produced or reproduced.

The terms “documents,” “documentation,” and “communications” specifically include:

all amendments, modifications, additional letters, and/or memos relating to a document; all drafts of documents or such amendments, modifications, additional letters, and/or memos relating to a document; and all copies of documents or such amendments, modifications, additional letters, and/or memos that include marginalia, or other printed or handwritten revisions or notations.

The terms “identify” and “identification” shall mean: As to any individual, stating his or

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her: full and customarily used name; resent residence address and business address;  
residence address and business address during the relevant time period;  
businesses or professions during the relevant time period;

As to a document, stating: the date of its creation, execution, and receipt; its author or signatory; its addressee and every other recipient or person having knowledge of its contents or whereabouts; its type or nature including its subject matter (which shall be stated with particularity); the name, business, and home addresses of the document custodian; and the present location of the document.

As to any transaction or occurrence, stating: its date; the place where it took place and the manner of its occurrence; identification of all participants and eye witnesses to its occurrence; its purpose and subject matter; and a concise description of that which transpired.

The term “related to” or “relating to” shall mean in any way concerning, containing, describing, comprising, referring to, reflecting, connected with, or pertaining to.

If you contend that any document that would otherwise have been produced may be withheld on grounds that it is privileged under the attorney/client privilege, the work product doctrine, or any other basis, then each such

document shall be fully identified in writing by stating those persons having knowledge of any facts related to the claim of privilege and all events, transactions, or occurrences related to the claim of privilege, except that the substance need not be described to the extent that it is privileged.

The term “statement(s)” shall encompass both written and recorded forms.

The term “photographs” shall mean, original or reproduction from negatives or laser copies, not photocopies.

The term “correspondence” shall encompass all forms and manners of same, including but not limited to: letters, faxes, memoranda, electronic mail, journals, diaries, and statements.

“And” and “or” as used herein are terms of inclusion and not of exclusion and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request any document or information that might otherwise be construed to be outside the scope of this request.

The “date of incident” as used herein shall mean the date(s) of incident referenced in the Complaint.

Plaintiff reminds Defendant that he/she/it has a duty under the Florida Rules of Civil Procedure to supplement responses to discovery throughout the course of this litigation.

This Request is a continuing one. If, after producing documents, you become aware of any further documents responsive to this Request, you are required to produce such additional documents.

**PRIVILEGED ITEMS**

With respect to any documents or items for which work product and/or attorney client privilege is claimed, please provide a list of items denoting date of preparation, type of item and the name, address, job title and employer of the person preparing the item and for each present custodian of same. Also submit the items in a sealed envelope to the Court for an in-camera inspection.

**ITEMS AND ELECTRONICALLY STORED INFORMATION TO BE  
PRODUCED**

1. Copies of all promissory notes executed contemporaneously with Sunwood giving the money for the Loan to Club.
2. Copies of all promissory notes executed at any time relative to the Loan.
3. Copies of all security agreements, chattel mortgages, liens or any document which you contend gave Sunwood a security interest in any asset belonging to the Club.
4. Copies of all security agreements, chattel mortgages, liens or any document which you contend gave a security interest to any person or entity relative to the Loan.
5. Copy of minutes of the Board meeting of the Board of Directors of the Club at which the Board voted in favor of taking the Loan.
6. Copy of minutes of any meeting of the members of the Club at which the members voted in favor of taking the Loan.
7. Copies of all communications, letters, emails, text messages or any written communication between You and any third-party (excluding your attorney) regarding the Loan.
8. Copies of all communications between any representative, owner, officer, director or member of Plaintiff Sunwood to you regarding the Loan.
9. Copies of all checks received by you or the Club that represent money received from Sunwood for the Loan.
10. Copies of all checks or other document that evidence payment by the Club to Sunwood for repayment of all or part of the Loan.
11. A copy of any and all documents, which or not privileged, which you consulted, referred to or relied upon in answering any of Plaintiff's Interrogatories to Defendant Kennedy.