

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

SUNWOOD, INC.

vs.

Case No.: CACE 21-003202 (12)

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.

Defendant

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Third-Party Plaintiff,

CARL L. KENNEDY, II

Third-Party Defendant

RESPONSES TO REQUEST TO PRODUCE

I, CARL L. KENNEDY, II, Third-Party Defendant, hereby respond to the Request to Produce propounded upon me by the Third-Party Plaintiff and state as follows:

I generally object to all instructions and definitions contained in Plaintiff's Request to Produce propounded to me, to the extent they differ from the Florida Rules of Civil Procedure.

1. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.
2. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.

3. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.
4. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.
5. The requested documents are not in my possession, custody or control, as such documents were the responsibility of the Secretary.
6. The requested documents are not in my possession, custody or control, as such documents were the responsibility of the Secretary.
7. None.
8. None.
9. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.
10. None.
11. The requested documents are in Plaintiff's possession, custody and control pursuant to discovery produced in Pompano Beach Senior Squadron Flying Club v Kennedy. The Request is therefore duplicative, unduly burdensome and intended solely to harass me.

I hereby certify that I sent a copy of this document via the e-portal to Edward F. Holodak, Esquire at pleadings@holodakpa.com, on the 13th day of December, 2021.

Respectfully submitted,

/s/ Carl L. Kennedy, II
Carl L. Kennedy, II
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