

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.

.....*I*

DEFENDANT’S REQUEST FOR ADMISSIONS TO PLAINTIFF

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC., A Florida Corporation (“CLUB”), pursuant to the Fla.R.Civ.P. 1.370, files this Request for Admissions to Plaintiff, SUNWOOD, INC., ‘s (“Sunwood”), to be answered within thirty (30) days, as follows:

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via eportal this 26th day of January 2022 to Dane Stanish, Esq., stanishd@gmail.com and Carl Kennedy, clktax@aol.com

_____/s/ Edward F. Holodak, Esq.,
EDWARD F. HOLODAK, ESQ.
Attorney for Defendant
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pleadings@holodakpa.com_____

REQUEST FOR ADMISSIONS

1. Admit or deny that no loan documents, other than the check Sunwood issued to Defendant Club were executed at the time Sunwood made the loan to Defendant Club.
2. Admit or deny that the Loan was an unsecured loan.
3. Admit or deny that Sunwood did not require Defendant Club to execute a promissory note for the Loan.
4. Admit or deny that Sunwood did not receive a collateral mortgage in consideration for the Loan.
5. Admit or deny that Sunwood never filed or recorded a UCC-1 against any asset of Defendant Club in consideration for the Loan.
6. Admit or deny that no other representative of Defendant Club, besides Carl Kennedy was involved in obtaining the Loan from Sunwood.
7. Admit or deny Sunwood is not in the business of making loans to third parties.
8. Admit or deny that the representative of Sunwood who authorized the Loan to Defendant Club knew that Defendant Club's By-Laws required a member vote to approve the Loan.