IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA

OFFICIAL CITY

CASE NO. CACE21-003202 (12)

SUNWOOD, INC.,

Plaintiff,
v.

POMPANO SENIOR SQUADRON
FLYING CLUB, INC.,

Defendant(s).

## PLAINTIFF'S MOTION FOR ENTRY OF FINAL SUMMARY JUDGMENT

SUNWOOD, INC., by and through its undersigned counsel, moves this Court for entry of either the attached proposed Final Judgment or an order setting forth the interest calculation, and states as follows:

- 1. On April 26, 2022, this Honorable Court granted Plaintiff's motion for summary judgment as to Count II of Plaintiff's Complaint.
- 2. The proposed Final Judgment was presented to counsel for the Defendant, Pompano Senior Squadron Flying Club, Inc. ("the Flying Club"), who objects to the interest calculation.
- 3. The Plaintiff's interest has been calculated from the date the Flying Club received the money from the Plaintiff.
- 4. Defendant maintains interest should be calculated from the date Plaintiff demanded return of the funds.

WHEREFORE the Plaintiff respectfully requests this Honorable Court hear the parties' mutual positions and enter either the attached proposed Final Judgment or an order

setting forth the interest calculation, and for such other and further relief as this Court may deem appropriate.

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished pursuant to Fla. R. Jud. Adm. 2.516 via the State of Florida e-Portal Filing System at Edward F. Holodak, Esq., Edward F. Holodak, P.A., 7951 SW 6<sup>th</sup> Street, Suite 210, Plantation, FL 33324; at pleadings@holodakpa.com; this 5<sup>th</sup> day of May, 2022.

CAROLYN N. BUDNIK, PLLC Co-Counsel for Plaintiff 4623 N.W. 53<sup>rd</sup> Avenue, Suite 2 Gainesville, FL 32653 Ofc. (352) 792-6180 Service e-Mail: carolyn@cbudlaw.com

s/Carolyn N. Budnik

By:\_\_\_\_

Carolyn N. Budnik Florida Bar No. 223610 IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO. CACE21-003202 (12)

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## \_\_\_\_\_/ FINAL SUMMARY JUDGMENT FOR PLAINTIFF

THIS CAUSE having come on for hearing on April 26, 2022, on the Plaintiff's Motion for Summary Judgment, and the Court having granted summary judgment on Count II of Plaintiff's Complaint, it is hereby,

ADJUDGED that plaintiff, Sunwood, Inc., c/o Law Offices of Dane Stanish, P.A., 3475 Sheridan Street, Suite 209, Hollywood, Florida 33021; recovers from defendant, Pompano Senior Squadron Flying Club, Inc., FEI # 59-1416663, the sum of \$100,000.00, prejudgment interest in the sum of \$15,252.60, with costs in the sum of \$2,072.00, making a total of \$117,324.60, that shall bear interest at the rate of 4.25% a year, for which let execution issue. ORDERED at .....