

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

CASE NO.: CACE 21-006666 (09)

PAUL SANCHEZ,

Plaintiff,

vs.

POMPANO SENIOR SQUADRON
FLYING CLUB, INC., d/b/a
POMPANO BEACH FLYING CLUB,
A Florida corporation,

Defendant.

NOTICE OF SERVING INTERROGATORIES

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC. (“Club”), pursuant to Rule 1.350, Fla. R. Civ. P. requests Plaintiff Paul Sanchez. (“Sanchez”) answer the following interrogatories in writing and under oath within thirty (30) days from the date of service hereof.

I HERBY CERTIFY that a true and correct copy of the foregoing has been sent via eportal this 1st day of December 2021 to Robert Puzio, Esq., The Litigation Defense Group, LLC, Attorney for Plaintiff Sanchez, 1040 Bayview Drive, Suite 520 Fort Lauderdale, Florida 33304, puziolaw@bellsouth.net

/s/ Edward F. Holodak, Esq.
EDWARD F. HOLODAK, ESQ.
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DEFINITIONS

1. As used herein, please note the terms you, Plaintiff, or Sanchez refers to Plaintiff Paul Sanchez.
2. The term Defendant or Club refers to Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC.
3. As used herein, the term person means any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, firm, other business enterprise, government body, group of natural persons, or other entity.
4. As used herein, the terms Adocuments@ as well as Adocumentation@ shall mean any written, printed or typed matter in the possession, custody or control of Defendant, his agents and/or attorneys, including, but not limited to, all drafts and copies bearing notations or marks not found in the original, letters and correspondence, interoffice communications, surveys, reports, messages of any type, telephone messages, notices, instructions, minutes, summaries, notes, notes of meetings, transcripts, file folder markings, and any other organizational indicia, accounting records, accounting worksheets, tapes or other recordings, magnetic tapes, electronic data storage devices, electronic data communication devices, computers spreadsheets, computer printouts, or any other information filed or stored in any form in computers or otherwise and which can be retrieved, obtained, manipulated, or translated.
5. As used herein, the term relates to or relating to@ means referring to, concerning, documenting, responding to, containing, regarding, discussing, documenting, describing, reflecting, analyzing, constituting, disclosing, employing, defining, stating, explaining, summarizing, or in any way pertaining to.
6. As used herein, the terms and as well as or shall be construed both disjunctively and conjunctively so as to bring within the scope of each of these requests any information which otherwise might be construed to be outside the scope of any request.
7. The use of the singular form of any word includes the plural, and the use of the plural includes the singular.

INSTRUCTIONS

8. Your written response shall state, with respect to each interrogatory shall provide exact information, and if you cannot be exact, estimate the information and so indicate, with upper and lower boundaries.

9. To the extent you object, please state the reasons for the objection, including any claim of privilege, and the factual basis therefore to determine the sufficiency of the basis for the objection. If objection is made to part of an interrogatory, the part shall be specified with the reasons, and the remaining parts shall be answered.
10. If you are unable to answer all or part of an interrogatory, identify the person whom you believe has the knowledge or information which the interrogatory addresses.
11. These interrogatories are deemed to be continuing in nature, and in the event you become aware of or acquire in your possession, custody or control additional information responsive to the interrogatory, you are requested to produce promptly an amendment to the previously supplied interrogatory answer or response.
12. If in responding to these interrogatories you encounter any ambiguity in construing any interrogatory, instructions or definition, please set forth the matter deemed ambiguous and the construction used in responding thereto.

INTERROGATORIES

1. State the name, address and phone number of the person or persons answering or assisting with the preparation of the answer to these interrogatories and their relationship to Plaintiff Sanchez.
2. State the name, address, phone number, and email address of each and every member of the Board of Directors of Defendant Club with whom you communicated regarding each loan you allege you gave the Club in your Complaint.

3. For each person you identify in your answer to Interrogatory #2, state the date you communicated with such person whether the communication was written or verbal, and the general contents of each communication.

4. State the name, address, phone number, and email address of each and every person other than members of the Board of Directors of Defendant Club who you communicated with regarding each loan you allege you gave the Club in your Complaint.

5. For each person you identify in your answer to Interrogatory #4, state the date you communicated with such person whether the communication was written or verbal, and the general contents of each communication.

9. State whether you have ever made any personal loans to any other person or entity, if so, identify the person or entity to whom you made the loan, the amount of such loan, and whether such loan was evidenced by a promissory note.

10. State the name, address, telephone number and email address of every person you allege had or has knowledge of your alleged loans to Defendant Club. For each person you identify, state the general facts or knowledge that each person possesses regarding your alleged loans to Defendant Club.

11. State each and every factual reason why you did not request Defendant Club signed a promissory note evidencing its obligation to repay each of your alleged loans.

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

PAUL SANCHEZ

The foregoing instrument was acknowledged before me, by means of _____ physical presence
or _____ online notarization, this _____ day of _____, 2021, by
_____ who is personally known to me or who produced
_____ as identification and who did take an oath.

Notary Public
My Commission Expires: