

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.

DEFENDANT'S REQUEST FOR PRODUCTION

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC., (Defendant "Club") by and through its undersigned counsel, pursuant to Rule 1.350, Fla. R. Civ. P., requests Plaintiff, PAUL SANCHEZ ("Sanchez") to 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 33 Street, Fort Lauderdale, FL 33308.

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.
Attorney for Defendant
Fla. Bar No.: 059234
Edward F. Holodak, P.A.
7580 NW 5th St., Suite 15125
Plantation, Fl. 33317
Telephone: (954) 927-3436
pleadings@holodakpa.com

DEFINITIONS AND INSTRUCTIONS

As used herein, the terms listed below are defined as follows:

1. The term Plaintiff refers to Paul Sanchez.
2. The term Defendant and Club refers to POMPANO SENIOR SQUADRON FLYING CLUB, INC.
3. For any documents produced, documents provided shall be completed and, unless privileged, un-redacted, submitted as found in the company's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with the corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

DOCUMENTS TO BE PRODUCED

1. Copy of any and all checks, both front and back, or any document evidencing payment by Plaintiff to Defendant Club of the alleged loans you identify in your Complaint.
2. Copy of any and all receipts, notes or any document from Defendant evidencing payment of any money due to you for the alleged loans.
3. Copy of all promissory notes, loan agreements or other another document evidencing the alleged loans to Defendant Club.
4. Copies of all communications, including text messages, emails or other electronic media between Plaintiff and any person or entity or any officer, director or member of Defendant Club, regarding the alleged loans, including but not limited to, applications, requests for the loans, credit checks, repayment terms, etc.
5. Copies all demands from Plaintiff to the Club for repayment of the loans, whether sent by Plaintiff, his agents or attorneys.
6. Copies of any minutes of Defendant Club's meetings, either Board of Directors or Members', in which the alleged loans were discussed.
7. Copy of any document, including emails, text messages, etc., evidencing the Club's need or reasons for requesting or accepting the alleged loans.
8. Copy of any communications between Plaintiff, his agents, employees, or attorneys and Carl Kennedy regarding the alleged loans or any issue related to your lawsuit against Defendant Club.