

IN THE COUNTY COURT IN
AND FOR BROWARD COUNTY,
FLORIDA

LLOYD DAVID HILL and
GRAHAM DAVID HILL,

CASE NO.: CONO 20 010538 (71)

Plaintiffs

v.

POMPANO SENIOR SQUADRON FLYING
CLUB D/B/A POMPANO BEACH FLYING
CLUB, A Florida corporation,

Defendant.

DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB D/B/A POMPANO BEACH FLYING CLUB (Defendant "Club"), by and through its undersigned counsel, files this Answer and Affirmative Defenses to Plaintiffs' LLOYD DAVID HILL and GRAHAM DAVID HILL'S (Plaintiffs "Hill") Complaint and says:

1. Defendant Club denies each and every allegation not specifically admitted herein.
2. Defendant Club admits that it is a Florida for-profit corporation operating in Broward County, Florida but denies all other allegations in Plaintiffs' Complaint.

AFFIRMATIVE DEFENSES

3. Defendant Club asserts as its first affirmative defense that Plaintiffs Hill have failed to state a cause of action.
4. Defendant Club asserts as its second affirmative defense that Lloyd Hill lacks standing.

5. Defendant Club asserts as its third affirmative defense that Plaintiffs Hill breached the contract first thereby excusing all contractual obligations of Defendant Club.

6. Defendant Club asserts as its fourth affirmative defense lack of consideration.

7. Defendant Club asserts as its fifth affirmative defense that Florida is an at will employment state and rightfully discharged Lloyd Hill from any employment.

8. Defendant Club asserts as its sixth affirmative defense that it properly followed its By-Laws and accordingly owes Plaintiffs Hill nothing.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via eportal this 28th day of October 2020 to Lloyd David Hill and Graham David Hill, 2728 NE 12 St., Pompano Beach, FL 33062.

_/s/ Edward F. Holodak, Esq.,

EDWARD F. HOLODAK, ESQ.

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