

**IN THE SMALL CLAIMS COURT
NORTH REGIONAL COURTHOUSE, BROWARD COUNTY, FLORIDA**

LLOYD DAVID HILL, and
GRAHAM DAVID HILL

Co-Plaintiffs,

vs.

Case No.: CONO 20 010538 (71)

POMPANO SENIOR SQUADRON FLYING CLUB,
DBA – POMPANO BEACH FLYING CLUB,
A Florida corporation,

Defendant.

PLAINTIFFS' MOTION TO DISMISS WITH PREJUDICE

Plaintiffs LLOYD DAVID HILL and GRAHAM DAVID HILL, (“the Hills”), proceeding *pro se*, against Defendant POMPANO SENIOR SQUADRON FLYING CLUB, INC., dba POMPANO BEACH FLYING CLUB (“the Club”), state that they have settled all disputes between themselves and the Club in this action and submit the attached proposed Order reflecting same.

WE HEREBY CERTIFY that a true and correct copy of the foregoing and attached has been submitted electronically to Defendant via the Small Claims Court E-Filing System on the 4th day of December 2020.

/s/ Lloyd David Hill
LLOYD DAVID HILL
Plaintiff
2728 NE 12th Street
Pompano Beach, FL 33062-3811
LHill@ourhillhouse.com

/s/ Graham David Hill
GRAHAM DAVID HILL
Plaintiff
2728 NE 12th Street
Pompano Beach, FL 33062-3811

**IN THE SMALL CLAIMS COURT
NORTH REGIONAL COURTHOUSE, BROWARD COUNTY, FLORIDA**

LLOYD DAVID HILL, and
GRAHAM DAVID HILL

Co-Plaintiffs,

vs.

Case No.: CONO 20 010538 (71)

POMPANO SENIOR SQUADRON FLYING CLUB,
DBA – POMPANO BEACH FLYING CLUB,
A Florida corporation,

Defendant.

AGREED ORDER OF DISMISSAL WITH PREJUDICE

Plaintiffs LLOYD DAVID HILL and GRAHAM DAVID HILL, (“the Hills”), proceeding *pro se*, and Defendant POMPANO SENIOR SQUADRON FLYING CLUB, INC., dba POMPANO BEACH FLYING CLUB (“the Club”), represented by the undersigned counsel, have informed the Court that they have settled all disputes between them in this action pursuant to the attached Settlement Agreement and have requested that the Hills’ claims against the Club be dismissed with prejudice. Accordingly, it is hereby

ORDERED that the Hills’ claims against the Club are DISMISSED with prejudice.

IT IS FURTHER ORDERED that the Hills and the Club shall each bear their own expenses, costs, and attorneys’ fees incurred in connection herewith.

SIGNED AND ENTERED this _____ day of DECEMBER, 2020.

Hon. Louis H. Schiff, County Court Judge
Broward County, Florida

AGREED AS TO FORM AND SUBSTANCE
AND ENTRY REQUESTED BY:

PLAINTIFFS (*pro se*):

/s/ Lloyd David Hill

LLOYD DAVID HILL
2728 NE 12th Street
Pompano Beach, FL 33062-3811
(954) 683-1584
lhill@ourhillhouse.com

/s/ Graham David Hill

GRAHAM DAVID HILL
2728 NE 12th Street
Pompano Beach, FL 33062-3811
(954) 683-1584

DEFENDANT'S COUNSEL:

/s/ Edward F. Holodak

EDWARD F. HOLODAK, ESQ.
Attorney for Defendant
Fla. Bar No.: 059234
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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.

SETTLEMENT AGREEMENT

WHEREAS, the parties wish to settle all disputes between them in this case; and

WHEREAS, the parties believe that it is in their best interest to settle this matter
without continuing litigation; and

WHEREAS, neither party admits liability or wrongdoing by entering into this
Settlement Agreement; and

WHEREAS, both parties agree that this Settlement Agreement is contingent on
full execution of the terms of a separate Confidential Statement; and

WHEREAS, both parties agree not to make any public statements about the
terms of the Confidential Statement;

NOW THEREFORE, it is agreed as follows:

1. The above recitations are included in this Settlement Agreement and
incorporated herein;
2. Upon satisfaction of the terms of the Confidential Statement, Plaintiffs LLOYD
and GRAHAM HILL shall move to dismiss this case with prejudice;

3. Any allegations by either party of violation of the terms of this Settlement Agreement, or the associated Confidential Statement, may only be pursued through new legal action in an appropriate court.

4. The parties agree that, in such enforcement actions, they will each be responsible for their own costs and related legal/attorney fees, and may not seek reimbursement of such costs in any setting.



LLOYD DAVID HILL


DATED: October 31, 2020



GRAHAM DAVID HILL

DATED: October 31, 2020

**POMPANO SENIOR SQUADRON FLYING CLUB
D/B/A POMPANO BEACH FLYING CLUB**



**GREGORY GILHOOLY,
PRESIDENT**

DATED: 11-11-20