IN THE COUNTY COURT IN AND FOR BROWARD COUNTY FLORIDA

Steven J. Borer,
Michael W. Borer,
Plaintiffs,
vs.
Pompano Beach Flying Club,
Gregory Gilhooly,
Defendants.

Case No.: COWE 20 22099 (81)

MOTION TO AMEND AND CORRECT CASE CAPTION

Now comes Steven J. Borer and Michael W. Borer, Plaintiffs in this case, who move to amend and correct the case caption.

AMENDMENTS/CORRECTIONS

- 1. On the filing form, Plaintiffs identified "Pompano Beach Flying Club" as a Defendant.
- 2. However, the legal name of the Defendant is "Pompano Senior Squadron Flying Club, Inc." who has registered to do business as ("DBA") Pompano Beach Flying Club.
- 3. Plaintiffs would like to remedy this error by correcting the Defendant name in case captions going forward to be: "Pompano Senior Squadron Flying Club, Inc., D/B/A Pompano Beach Flying Club."
 - 4. Plaintiffs also identified Gregory Gilhooly, President of Defendant, on the form.
- 5. Mr. Gilhooly is the registered agent for the Club and Plaintiffs intended to identify him only for service purposes.
 - 6. However, the Court has identified him as a named Defendant in the case caption.
- 7. Whether by Plaintiffs' error or the Court's error, Plaintiffs would like to remedy this by removing Gregory Gilhooly as a named Defendant.
- 8. Michael W. Borer is the father of non-minor Steven J. Borer and, upon reconsideration, believes he is not a proper Plaintiff in this case.
- Thus, Plaintiffs would like to remedy this by removing Michael W. Borer as a named Plaintiff.

10. Plaintiffs are therefore requesting that the parties and caption for the case be simplified to: "Steven J. Borer vs. Pompano Senior Squadron Flying Club, Inc., D/B/A Pompano Beach Flying Club."

SUMMARY

CONSIDERING THE FOREGOING, Plaintiffs request an order:

- 11. Removing Gregory Gilhooly as a named Defendant in this case.
- 12. Removing Michael W. Borer as a named Plaintiff in this case.
- 13. Changing the caption of the case to be "Steven J. Borer vs. Pompano Senior Squadron Flying Club, Inc., D/B/A Pompano Beach Flying Club."
 - 14. Granting Plaintiffs such other relief as the Court deems appropriate.

Respectfully,

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WE HEREBY CERTIFY that the original of the foregoing was hand-delivered to the Clerk of the Court, and that a true and correct copy of the foregoing has been e-mailed to Defendant's Counsel, Edward Holodak, at the email addresses he filed (pleadings@holodakpa.com and edward@holodakpa.com) on the 7th of December 2020.