

IN THE COUNTY COURT IN AND FOR BROWARD COUNTY FLORIDA

**Steven J. Borer,
Plaintiff,**

vs.

**Pompano Senior Squadron Flying Club, Inc.,
D/B/A Pompano Beach Flying Club,
Defendant.**

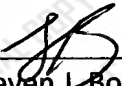
Case No.: COWE 20 22099 (81)

MOTION TO PRODUCE AT TRIAL

Now comes Steven J. Borer, Plaintiff *Pro Se* in this case, who moves to respectfully ask the Court to order Defendant to produce at trial evidence relating to the matter before the Court.

- 1. Plaintiff was a member of the Club from April 2018 until December 2018 and was provided with club documents via email during that time.**
- 2. Plaintiff was not provided any club meeting minutes, club financial records, or club correspondence prior to becoming a member or after withdrawing from the club.**
- 3. Plaintiff respectfully requests Court order Defendant to provide the following documents at trial.**
- 4. Club meeting minutes from 2018 and 2019: Specifically meeting minutes where the Club Directors set the membership fee for the corresponding year in accordance with the club by-laws.**
- 5. Club bank records for 2018 and 2019: Specifically each and every instance where a membership fee was recorded as being returned to a withdrawing club member.**
- 6. Club financial records furnished/reported to members of the club during monthly club meetings for 2018, 2019, and 2020.**

Respectfully,



Steven J. Borer
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I 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 23rd of December 2020.