

IN THE COUNTY COURT IN AND
FOR BROWARD COUNTY, FLORIDA

STEVEN J. BORER, et al,

CASE NO.: COWE 20-22099 (81)

Plaintiff,

v

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

Defendant.

**DEFENDANT'S RESPONSE TO PLAINTIFF'S
REQUEST FOR PRODUCTION**

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB, INC., pursuant to Rule 7.020(b), Fla.Sm.C.R., and Rule 1.350, Fla.R.Civ.P., files this Response to Plaintiff's Request for Production served on or about December 23, 2020.

Defendant Club interprets Plaintiff Borer's Motion to Produce at Trial as a Request to Produce pursuant to Rule 7.020(b), Fla.Sm.C.R., and Rule 1.350, Fla.R.Civ.P. and files the following objections accordingly:

1. Will produce.
2. Objection - Overbroad, immaterial, and irrelevant. The Club's financial records are protected by Florida's Constitution Article 1, Section 23, and further is irrelevant and immaterial to the issues raised in Plaintiff Borer's Statement of Claim.

3. Will produce.

I HERBY CERTIFY that a true and correct copy of the foregoing has been sent U.S. Mail this 7th day of January 2021 to Steve Borer.

/s/ Edward F. Holodak

EDWARD F. HOLODAK, ESQ.

Fla. Bar No. 59234

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REQUESTS FOR PRODUCTION

1. All documents reflecting PBFC's current liabilities, including invoices, billing statements, collection letter(s), the result of any lawsuit(s), and any written demand communications (letters or emails).

Attached.

2. Statements of any and all credit card(s) used to pay for PBFC expenses since February 12, 2020, regardless of the name in which the credit card is held.

Attached.

3. Copies of any and all documents related to payments made to any member or former member of PBFC since February 12, 2020, including loan or "IOU" documents, copies of checks and any other form of payment.

None.