

IN THE COUNTY COURT IN  
AND FOR BROWARD COUNTY,  
FLORIDA

STEVEN J. BORER, et al,

CASE NO.: COWE 20-22099 (81)

Plaintiffs

v.

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

Defendant.

---

**REQUEST TO PRODUCE**

Defendant, POMPANO SENIOR SQUADRON FLYING CLUB D/B/A POMPANO BEACH FLYING CLUB (Defendant "Club"), pursuant to Rule 7.020(b) Fla. Sm. C. R., and Rule 1.350 Fla. R. Civ. P. propounds this Request to Produce to Plaintiff STEVEN J. BORER (Plaintiff "Borer") to produce the following documents for inspection and copying within thirty (30) days from the date of service, to the Law Office of Edward F. Holodak, P.A., 7951 SW 6 St., Suite 210, Plantation, FL 33324.

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.  
Attorney for Defendant  
Fla. Bar No.: 059234  
Edward F. Holodak, P.A.  
7951 SW 6<sup>th</sup> St., Suite 210  
Plantation, Fl. 33324  
Telephone: (954) 927-3436  
[pleadings@holodakpa.com](mailto:pleadings@holodakpa.com)

## **DEFINITIONS AND INSTRUCTIONS**

As used herein, the terms listed below are defined as follows:

1. The term Defendant refers to Defendant POMPANO SENIOR SQUADRON FLYING CLUB D/B/A POMPANO BEACH FLYING CLUB.
2. The term Plaintiff refers to STEVEN J. BORER.
3. For any documents produced, documents provided shall be completed and, unless privileged, un-redacted, submitted as found in the company's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The company may submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with the corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

## **DOCUMENTS TO BE PRODUCED**

1. Copy of application submitted for you to become a member of the Club.
2. Copy of all checks written by you to Defendant Club from the time of your application to the present date.
3. Copies of all communications between you and any member, officer or director of Defendant Club from the time of your application to the present date.
4. Copies of any invoices, bills for services, charges related to the use or rental of any airplane belonging to Defendant Club from the time of your application to the present date.
5. Copy of all communications from you, since the time of your application to the present date, in which you requested financial records, minutes of meetings, or any other corporate documents from Defendant Club.