# IN THE CIRCUIT COURT OF THE 15<sup>TH</sup> JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 2023-CA-001432

CHENEY BROS., INC., a Florida Corporation,

Plaintiff,

VS.

WESLEY RICHARDS,

Defendant.

### **NOTICE OF SERVICE OF INTERROGATORIES**

Plaintiff, CHENEY BROS., INC., propounds the attached Interrogatories to Defendant, WESLEY RICHARDS, to be answered in accordance with Florida Rule of Civil Procedure 1.340.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-portal this 10<sup>th</sup> day of March, 2023, to: Beth Coke, Esq., Coke Employment Law, 131 N. 2<sup>nd</sup> Street,, Suite 204, Fort Pierce, FL 34950 (beth@cokeemploymentlaw.com).

WYLAND & TADROS LLP Attorneys for Plaintiff 2505 Metrocentre Blvd., 2<sup>nd</sup> Floor West Palm Beach, FL 33407 Tel. No.: (561) 275-2990 dtadros@wylandtadros.com atharp@wylandtadros.com

BY: /s/David S. Tadros

DAVID S. TADROS, ESQ.

FBN 956015

CHARLES ANDREW THARP, ESQ.

FBN 0746134



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# **INTERROGATORIES TO DEFENDANT**

1. What is the name and address of the person answering these interrogatories?

2. Please state the name of your current employer, including the name of your direct supervisor.

3. Please state your current job position and your job duties and responsibilities.



4. Please state when you applied for your current job position.

5. Please state when you accepted your current job position.

6. Please state your compensation and any bonuses, including all benefits (health/life/disability) with your current employer.



7. Please list all training completed by you for certification in the Citation Sovereign and the time frame of the training.

8. Please state where you received training for certification to fly the Citation Sovereign.

9. Please state if you paid for the training for certification in the Citation Sovereign and the amount paid. If you did not pay for the training, please state who paid for the training.



10. Please state the date you severed your employment with Cheney Brothers, Inc. ("CBI").



11. Please state your compensation and any bonuses, including all benefits (health/life/disability) during your tenure with CBI. You may list your compensation for each year starting in 2018.

12. Please state your job duties and responsibilities during the last year of employment with CBI.



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