

IN THE CIRCUIT COURT OF THE 15TH 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.

PLAINTIFF'S FIRST REQUEST TO PRODUCE TO DEFENDANT

Plaintiff, CHENEY BROS., INC. ("CBI"), by and through its undersigned attorneys, pursuant to Rule 1.350, Florida Rules of Civil Procedure, request the Defendant to produce the following documents at the offices of the undersigned counsel for inspection and/or copying within the time specified by the aforementioned Rule and Rule 1.090(e), Florida Rules of Civil Procedure, or at such other place and time as may be agreed upon by counsel:

Definitions

- A. The terms "document" and "documentation" are defined, in addition to their common meanings, as the original or any copy, electronic copy, excerpt, photocopy, or facsimile of all written, printed, typed, recorded, or graphic matter, photographic matter, and sound reproduction of tapes or other devices, however produced or reproduced, in the actual or constructive possession, custody, or control of the party or party's representative, which documents include, but are not limited to, letters, telegrams, memoranda, reports, studies, calendars of daily entries, minutes, pamphlets, notes, charts, tabulations, and records of meetings, conferences, and telephone or other conversations or communications.
- B. The term "you" means the person(s), corporation(s), or other entities to which this Request is directed.
- C. The term "correspondence" means any letter, memorandum, note, on paper or stored electronically, including emails, reflecting or constituting a communication between two (2) people or among more than two (2) people.

Documents Requested

1. Any and all correspondence between you and CBI related to your employment with CBI (2018-2023).
2. Any and all correspondence between you and CBI related to your aircraft training and qualifications.
3. Any and all documents concerning your application for employment with CBI.
4. Any and all documents that you provided to CBI in support of your application for employment.
5. Any and all documents related to your compensation during your employment with CBI, including, but not limited to, salary, bonus, health/life/disability insurance and other benefits.
6. Any and all documents concerning your severance from CBI.
7. Any and all applications for employment with Presidential Aviation, Inc.
8. Any and all documents provided to Presidential Aviation, Inc. regarding employment and as part of the employment application.
9. Any and all correspondence with Presidential Aviation, Inc.
10. Any and all documents exchange by you with Presidential Aviation, Inc.
11. Any and all applications for employment for the years 2018 – 2023.
12. Any and all documents provided by you in support of your application for employment for the years 2018 – 2023.
13. A copy of your 2022 Resume/Curriculum Vitae.
14. A copy of your 2023 Resume/Curriculum Vitae.
15. Any and all documents provided to you by CBI necessary for you to perform your duties while employed by CBI, including, but not limited to, training manuals job descriptions, aircraft flight manuals or other documents utilized for your job.
16. Any and all copies of your current job description.
17. Any and all documents demonstrating all aircraft flight certifications held by you from 2018 to the present.

18. Any and all documents for flight or aircraft training programs you participated in from 2018 to the present.
19. Any and all documents related to your training in the Citation XLS, Citation 560.
20. Any and all documents related to your training and upgraded certification for the Citation Sovereign aircraft.
21. Any and all documents related to payment for certifications, licenses or other requirements for you to perform your duties while employed at CBI.
22. Any and all documents related to payment for your training and upgraded certification for the Citation Sovereign aircraft.
23. Any and all cell phone records for October 2022, November 2022, December 2022 and January 2022.
24. Any and all Tax Returns with supporting documents for the years 2020-2022.
25. A copy of your Pilot logbook.

CERTIFICATE OF SERVICE

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

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