

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 REQUESTS FOR ADMISSIONS TO DEFENDANT

Plaintiff, CHENEY BROS., INC. ("CBI"), by and through its undersigned attorneys, pursuant to Rule 1.370, Florida Rules of Civil Procedure, requests the Defendant, WESLEY RICHARDS, to admit or deny the following Requests for Admissions, within thirty (30) days from the date of service.

1. Admit that it was your intention to leave CBI if you did not receive a pay increase upon completion of training/certification for the Cessna Citation Sovereign 680.
2. Admit that you communicated to your co-employees your intention to leave CBI if you did not receive a pay increase upon completion of training/certification for the Cessna Citation Sovereign 680.
3. Admit that you communicated to Ivan Brenes your intention to leave CBI if you did not receive a pay increase upon completion of training/certification for the Cessna Citation Sovereign 680.

4. Admit that you communicated to Alex Ice your intention to leave CBI if you did not receive a pay increase upon completion of training/certification for the Cessna Citation Sovereign 680.
5. Admit that you communicated (phone, text, email, job board, person-to-person) with a recruiter or aviation company during the period of November 28, 2022 through December 13, 2022 about available positions as a pilot (PIC or SIC).
6. Admit that you communicated (phone, text, email, job board, person-to-person) with a recruiter or aviation company during the 90-day period prior to November 28, 2022 about available positions as a pilot (PIC or SIC).
7. Admit that you communicated (phone, text, email, job board, person-to-person) with a recruiter or aviation company during the 30-day period after December 13, 2022 about available positions as a pilot (PIC or SIC).
8. Admit that you were a member of the job board "Climbto350" during the period of November 28, 2022 through December 13, 2022.
9. Admit that you were a member of the job board "Climbto350" during the 90-day period prior to November 28, 2022.
10. Admit that you were a member of the job board "Climbto350" during the 30-day period after December 13, 2022.
11. Admit that you contacted Presidential Aviation through the job board "Climbto350."
12. Admit that you contacted Thomas Allen through the job board "Climbto350."
13. Admit that you communicated (phone, text, email, job board, person-to-person) with Thomas Allen during the period of November 28, 2022 through December 13, 2022.

14. Admit that you communicated (phone, text, email, job board, person-to-person) with Thomas Allen during the 90-day period prior to November 28, 2022.
15. Admit that you communicated (phone, text, email, job board, person-to-person) with Thomas Allen during the 30-day period after December 13, 2022.
16. Admit that you communicated (phone, text, email, job board, person-to-person) with a representative of Presidential Aviation during the period of November 28, 2022 through December 13, 2022.
17. Admit that you communicated (via phone, text, email, job board, person-to-person) with a representative of Presidential Aviation during the 90-day period prior to November 28, 2022.
18. Admit that you communicated (phone, text, email, job board, person-to-person) with a representative of Presidential Aviation during the 30-day period after December 13, 2022.
19. Admit that you communicated (phone, text, email, job board, person-to-person) with a representative of Premier Aviation during the period of November 28, 2022 through December 13, 2022.
20. Admit that you communicated (phone, text, email, job board, person-to-person) with a representative of Premier Aviation during the 90-day period prior to November 28, 2022.
21. Admit that you communicated (phone, text, email, job board, person-to-person) with a representative of Premier Aviation during the 30-day period after December 13, 2022.
22. Admit that you communicated (phone, text, email, job board, web page, person-to-person) with a representative of NetJets during the period of November 28, 2022 through December 13, 2022.

23. Admit that you communicated (phone, text, email, job board, web page, person-to-person) with a representative of NetJets during the 90-day period prior to November 28, 2022.
24. Admit that you communicated (phone, text, email, job board, web page, person-to-person) with a representative of NetJets during the 30-day period after December 13, 2022.
25. Admit that you communicated (phone, text, email, person-to-person) with co-employees at CBI during the period of November 28, 2022 through December 13, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.
26. Admit that you communicated (phone, text, email, person-to-person) with co-employees at CBI during the 90-day period prior to November 28, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.
27. Admit that you communicated (phone, text, email, person-to-person) with co-employees at CBI during the 30-day period after December 13, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.
28. Admit that you communicated (phone, text, email, person-to-person) with Ivan Brenes during the period of October 28, 2022 through December 13, 2022 about your efforts to obtain a pilot (PIC or SIC) with another company.
29. Admit that you communicated (phone, text, email, person-to-person) with Ivan Brenes during the 90-day period prior to November 28, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.
30. Admit that you communicated (phone, text, email, person-to-person) with Ivan Brenes during the 30-day period after December 13, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.

31. Admit that you communicated (phone, text, email, person-to-person) with Alex Ice during the period of October 28, 2022 through December 13, 2022 about your efforts to obtain a pilot (PIC or SIC) with another company.
32. Admit that you communicated (phone, text, email, person-to-person) with Alex Ice during the 90-day period prior to November 28, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.
33. Admit that you communicated (phone, text, email, person-to-person) with Alex Ice during the 30-day period after December 13, 2022 about your efforts to obtain a pilot position (PIC or SIC) with another company.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-portal this 4th day of August, 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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