IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CIVIL DIVISION

CASE NO. CACE22001852

KAMEKA MANAGEMENT SOLUTIONS, INC. and ERYCK DZOTSI,

Plaintiffs,

v.

16260 SADDLE CLUB ROAD, LLC, RYAN BURKE, VEW LIVE, LLC, and 2045 SW 127TH AVENUE, LLC,

Defendants.
_____/

NOTICE OF PRODUCTION FROM NON-PARTY
(FLA. R. CIV. P. RULE 1.351)

TO: All parties on the attached Counsel List

YOU ARE HEREBY NOTIFIED that after fifteen (15) days from the date of service of this Notice, the undersigned will issue and serve the attached subpoenas directed to:

AMERICAN AIRLINES GROUP, INC.
c/o its Registered Agent, Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

who is not a party, to produce the items listed at the time and place specified in the Subpoena.

COHEN LAW
Attorneys for Plaintiffs
2332 Galiano Street
2nd Floor
Coral Gables, FL 33134
Tel: [redacted]
Fax: [redacted]
Email: [redacted]
Email: [redacted]

/s/ Keith R. Gaudioso
Danielle Cohen, Esq.
Fla. Bar No.: 27623
Keith R. Gaudioso, Esq.
Fla. Bar No.: 34436

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronical mail to Robert A. Rosenblatt, Esq., The Rosenblatt Law Firm, 7695 SW 104th Street, 2d Floor, Pinecrest, FI 33156 at [redacted] this 10th day of October 2023.

/s/ Keith R. Gaudioso
Keith R. Gaudioso, Esq.

COHEN LAW
2332 Galiano Street, Second Floor, Coral Gables, FL 33134
Telephone: [redacted] Facsimile: [redacted]

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_____/

SUPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: **AMERICAN AIRLINES, INC.**
c/o its Registered Agent, Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

YOU ARE COMMANDED to furnish the following to the undersigned via 2332 Galiano Street, Second Floor, Coral Gables, FL 33134 on or before September 21, 2023 at 5:00 pm and to have with you at that time and place the following:

DUCES TECUM:

1. All American Airline trip records regarding **Ryan Burke,** for **April 1, 2022, Flight AA 462, from Miami (MIA) to Las Vegas (LAS),** and **April 4, 2022, Flight AA 2742, from Las Vegas (LAS) to Miami (MIA); Record Locator:** [redacted]

COHEN LAW
2332 Galiano Street, Second Floor, Coral Gables, FL 33134
Telephone: [redacted] Facsimile: [redacted]

2. You are to produce an exact original duplicate of the Passengers Manifest for **April 4, 2022, Flight AA 2742, from Las Vegas (LAS) to Miami (MIA).** [All passenger names other than **Ryan Burke** may be redacted].

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the terms to be predicted to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. **THIS IS NOT A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. (IF THE COST FOR PROVIDING THESE RECORDS EXCEEDS $250.00, PLEASE CONTACT THE UNDERSIGNED PRIOR TO COMPLYING WITH THIS SUBPOENA). Any and all current billing records for services rendered, account information, statements, invoices, bills, records, emails, and outstanding balances. In other words, EVERYTHING in your possession regarding this account. YOU MAY MAIL OR DELIVER THE COPIES TO THE ATTORNEY WHOSE NAME APPEARS ON THIS SUBPOENA.

You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena:
If you fail to: (1) appear as specified; or (2) furnish the records instead of appearing as provided above; or (3) object to this Subpoena, you may be in contempt of court. You are subpoenaed by the attorney whose name appears on this Subpoena and unless excused from this Subpoena by the attorney or the Court, you shall respond to this Subpoena as directed.

COHEN LAW
2332 Galiano Street, Second Floor, Coral Gables, FL 33134
Telephone: [redacted] Facsimile: [redacted]

I HEREBY CERTIFY that pursuant to Rule 1.351 of the Florida Rules of Civil Procedure, I caused to be served upon all counsel of record, the attorneys in fact for all parties, a Notice of Production From Non-party that contained sufficient information to permit all parties, to raise an objection to the requested disclosures, and that the time for all parties, to raise an objection has lapsed or all objections have been resolved.

BY: /s/ Keith R. Gaudioso
Keith R. Gaudioso, Esq.

COHEN LAW
2332 Galiano Street, Second Floor, Coral Gables, FL 33134
Telephone: [redacted] Facsimile: [redacted]