|  |  |  |
| --- | --- | --- |
| ninth judicial district of florida  **CASE NO: ct-2021:001** | | |
| **ANDREW EAST,**  **Plaintiff,**  **vs.**  **DONHAV NONAME,**  **Defendant.** | **/** |  |

**Plaintiff’s REQUEST FOR ADMISSIONS TO DEFENDANT**

COMES NOW the Plaintiff, ANDREW EAST, by and through the undersigned counsel and pursuant to Florida Rule of Civil Procedure 1.370, and hereby requests Defendant, , to admit in writing the truth of the fourteen (14) numbered matters set forth below on or by the forty-fifth (45th) day after service of this Request for Admissions.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon said Defendant, along with the Summons and Complaint.

|  |  |
| --- | --- |
|  | Preston Blair, Esquire  FBN:  Morgan & Morgan Fort Myers PLLC  703 Waterford Way, Ste. 1000  Miami, FL 33126  Telephone Phone: (901) 333-1823  Facsimile: (901) 524-1787  Primary email: pblair@forthepeople.com  Secondary email:  Attorneys for Plaintiff |

**Plaintiff’s REQUEST FOR ADMISSIONS TO DEFENDANT**

1. Jurisdiction for the Complaint filed by Plaintiff is properly brought before the Circuit Court in Miami-Dade County, Florida.
2. Service of process against the Defendant in this action was proper.
3. This is an action for damages in excess of thirty thousand dollars ($30,000) arising in Miami-Dade County, Florida.
4. The action brought against Defendant correctly and properly names the party involved in the collision which is the subject of Plaintiff’s Complaint.
5. Defendant was operating a motor vehicle on or about April 22, 2021 on at or near its intersection with in , Miami-Dade County, Florida.
6. The motor vehicle operated by Defendant was either owned by Defendant or was being operated by Defendant with the knowledge, permission, and consent of its owner.
7. Defendant was negligent in the operation of the motor vehicle which resulted in the subject collision with Plaintiff's vehicle.
8. Defendant received a citation issued by the investigating law enforcement agency arising out of the subject accident.
9. Defendant pled guilty and/or was adjudicated in relation to said citation in connection with the subject accident.
10. Plaintiff was injured in the subject accident.
11. Plaintiff suffered a permanent injury within a reasonable degree of medical probability resulting from the subject accident.
12. Plaintiff was not guilty of negligence which caused or contributed to the subject accident.
13. Plaintiff incurred medical expenses for treatment of injuries resulting from the subject accident.
14. Plaintiff's medical expenses were reasonable and necessary for the care and treatment of the injuries sustained in the subject accident.