

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR LEE COUNTY, FLORIDA
CIVIL DIVISION
CASE NO: 22-CA-2461**

MARIE LAURORE,

Plaintiff,

-v-

**LIBERTY MUTUAL PERSONAL
INSURANCE COMPANY,**

Defendant.

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PLAINTIFF'S RESPONSE TO REQUEST FOR ADMISSIONS

Plaintiff, MARIE LAURORE, by and through the undersigned attorney, responds to the Request for admissions of Defendant, LIBERTY MUTUAL PERSONAL INSURANCE COMPANY, served the 12th day of August, 2022, as follows:

1. Please admit that the Plaintiff or Plaintiffs have not subrogated any portion of their claim for hospital, medical or other expenses to any entity, including any insurance company or companies under any insurance policy, in connection with the injuries allegedly sustained as a result of the incident alleged in the Complaint.

ANSWER: Deny.

2. Please admit that there are no liens of any kind (including, but not limited to, Workers' Compensation liens, attorney liens, judgment liens, Federal liens, including Medicare and Internal Revenue Service) that may or will attach to any monetary proceeds received by the Plaintiff or Plaintiffs in this case as a result of any judgment rendered in this cause or any settlement of this cause between the parties as a result of the incident alleged herein.

ANSWER: Admit.

3. Please admit that all lost wages incurred by you in connection with the injuries you allegedly sustained as a result of the incident alleged herein, have been paid by collateral sources.

ANSWER: Deny.

4. Please admit that all medical expenses incurred by you in connection with the injuries you allegedly sustained as a result of the incident alleged herein, have been paid by collateral sources.

ANSWER: Deny.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, by email, this 16th day of August, 2022 to: Christine R Hennes, Esquire, Law Office of Robert P Kelly, P.O. Box 7217, London, KY. 40742, plgmail@libertymutual.com, Christine.hennes@libertymutual.com.

_____/s/ Derrick Isaac_____
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