

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

DIVISION:

JOHN WIENKE,

Plaintiff,

CASE NO. 50-2022-CA-007058-
XXXX-MB

vs.

ALMA J. HARTER, MICHAEL D. HARTER,
AND PROGRESSIVE EXPRESS INSURANCE
COMPANY, A Foreign Profit Corporation,
individually,

Defendants.

DEFENDANT, PROGRESSIVE EXPRESS INSURANCE COMPANY'S
REQUEST FOR ADMISSIONS TO PLAINTIFF

COMES NOW, the Defendant, PROGRESSIVE EXPRESS INSURANCE COMPANY
(hereinafter "Defendant"), by and through its undersigned counsel and pursuant to Fla.R.Civ.P.
1.370, requests that Plaintiff, JOHN WIENKE, admit or deny the following within thirty (30) days
of service:

1. Admit or deny that you have received Social Security benefits for a period of 24
months or more.

RESPONSE:

2. Admit or deny that you may be eligible for Medicare benefits within the next
eighteen (18) months.

RESPONSE:

3. Admit or deny that you may be eligible for Medicare benefits within the next three
(3) years.

RESPONSE:

4. Admit or deny that Medicare has a conditional lien on the medicals you are claiming as a result of the alleged incident.

RESPONSE:

5. Admit or deny that Medicare has made payments on the medicals on the injuries you are claiming as a result of the alleged incident.

RESPONSE:

6. Admit or deny that you have received a formal letter from Medicare outlining the conditional lien amount.

RESPONSE:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of September 2022, a true and correct copy of the foregoing was E-Filed with the Circuit Civil Clerk of Palm Beach County Court via Florida Courts eFiling Portal and sent via E-Mail to:

Tony Bennett, Esq. Morgan & Morgan 1700 Palm Beach Lakes Blvd., Suite 140 West Palm Beach, Florida 33401 tbennett@forthepeople.com ncoull@forthepeople.com <i>Attorneys for Plaintiff</i>	Donna M. Wilson-Sampson, Esq. Law Offices of Ryan, Acosta, Farmer & Marsh P.O. Box 258829 Oklahoma City, OK 73125-8829 davielegal@farmersinsurance.com <i>Attorneys for Defendants, Alma J. Harter and Michael D. Harter</i>
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HINSHAW & CULBERTSON LLP

/s/ John K. Weedon

John K. Weedon

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***Attorneys for Defendant, Progressive Express
Insurance Company***