

IN THE CIRCUIT COURT OF THE 7<sup>TH</sup> JUDICIAL CIRCUIT  
IN AND FOR VOLUSIA COUNTY, FLORIDA

CASE NO: 2022 11508 CIDL

FRITZ VOLTAIRE,

Plaintiff,

vs.

ANTHONY WITHEY,

Defendant.

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**REQUEST FOR ADMISSIONS TO PLAINTIFF**

COMES NOW the Defendant, ANTHONY WITHEY, by and through the undersigned counsel, requests the Plaintiff, FRITZ VOLTAIRE, in accordance with Rule 1.370 Fla. R. Civ. P., within the time limits as provided by said rule, to admit or deny the following:

1. You are entitled to receive personal injury protection benefits as a result of the subject accident.
2. You have received personal injury protection benefits as a result of the subject accident.
3. You are entitled to receive medical payments coverage benefits as a result of the subject accident.
4. You have received medical payments coverage benefits as a result of the subject accident.
5. You sustained no permanent injuries as a result of the subject accident.
6. No medical provider has expressed a medical opinion that you have sustained a permanent injury as a result of the subject accident.

7. You received no permanent and/or significant scarring as a result of the subject accident.
8. You did not lose any wages or income as a result of the subject accident.
9. You were not gainfully employed at the time of the subject accident.
10. You have not had a surgical procedure that you allege is causally related to the subject accident.
11. You are not currently scheduled for any surgical procedure that you allege is causally related to the subject accident.

### **CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true and correct copy of the foregoing was emailed to: **MARTIN J. JAFFE, ESQ.**, *Attorney for Plaintiff*, Morgan & Morgan, P.A., 230 N. Woodland Blvd., Suite 308, Deland, FL 32720, [Mjaffe@forthepeople.com](mailto:Mjaffe@forthepeople.com); [scolon@forthepeople.com](mailto:scolon@forthepeople.com); [tkirwan@forthepeople.com](mailto:tkirwan@forthepeople.com); on this 13th day of December, 2022.

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By: /s/ Vanessa Thomson  
Vanessa Thomson  
Florida Bar No.: 1018430