

IN THE CIRCUIT COURT OF THE 18TH  
JUDICIAL CIRCUIT IN AND FOR BREVARD  
COUNTY, FLORIDA

CASE NO. 05-2022-CA-053750-XXXX-XX

ALICE KEIGHLER,

Plaintiff,

vs.

DOUG POTTER, EAST COAST METALS  
STRUCTURES CORP. and USAA  
CASUALTY INSURANCE COMPANY,

Defendants.

\_\_\_\_\_ /

**REQUEST FOR ADMISSIONS**

Defendant, EAST COAST METALS STRUCTURES CORP., pursuant to Florida Rule of Civil Procedure 1.370, requests the Plaintiff ALICE KEIGHLER to admit or deny the following within thirty (30) days after service of this request:

1. The vehicle that you were driving at the time of the accident was equipped with a seat belt that functioned as both a lap belt and a shoulder harness for the driver.
2. The vehicle that you were driving at the time of the accident was equipped with a fully operational seat belt that functioned as both a lap belt and a shoulder harness for the driver ("the seat belt").
3. You were not wearing the seat belt at the time of the accident.
4. Wearing the seat belt would have prevented you from striking any part of your body against any portion of the interior of the vehicle.
5. You would not have been injured in the accident complained of if you had been wearing the seat belt.

6. You would not have been injured as severely if you had been wearing the seat belt.
7. All the injuries you complain of as a result of this accident could have been avoided if you had been wearing the seat belt.
8. Some of the injuries that you complain of as a result of this accident could have been avoided if you had been wearing the seat belt.

### **CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that a true copy of the foregoing was served by Electronic Service via the Florida Courts E-filing Eportal pursuant to the Supreme Court Administrative Order AOSC13-490 this date, December 21, 2022 to: Adrienn N. Toth, Esq., Morgan & Morgan, P.A., 20 North Orange Avenue, 16th Floor, Orlando, FL 32801, [atoth@forthepeople.com](mailto:atoth@forthepeople.com); [emilysmith@forthepeople.com](mailto:emilysmith@forthepeople.com); [vanessac@forthepeople.com](mailto:vanessac@forthepeople.com).

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"(Signed by attorney electronically after review)"

By: \_\_\_\_\_  
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