

IN THE CIRCUIT COURT, OF THE
EIGHTEENTH JUDICIAL CIRCUIT, IN
AND FOR SEMINOLE COUNTY,
FLORIDA

CASE NO: 2022-CA-002235

JOSHUA PINK,

Plaintiff,

vs.

MATHEW ZUMBRUM,

Defendant.

DEFENDANT'S REQUEST FOR ADMISSIONS TO PLAINTIFF, JOSHUA PINK

COME NOW the Defendant, MATHEW ZUMBRUM, by and through the undersigned attorneys, and pursuant to Rule 1.370, Florida Rules of Civil Procedure, requests the Plaintiff, JOSHUA PINK, admit in this action that each of the following statements are true:

1. Please admit that Plaintiff, JOSHUA PINK, received benefits from a collateral source, as defined by §768.76, Florida Statutes, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
2. Please admit that Plaintiff, JOSHUA PINK, received benefits from a collateral source, as defined by §768.76, Florida Statutes, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.
3. Please admit that Plaintiff, JOSHUA PINK, received benefits under the Personal Injury Protection portion of an automobile policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

4. Please admit that Plaintiff, JOSHUA PINK, received benefits under the Personal Injury Protection portion of an automobile insurance policy for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

5. Please admit that Plaintiff, JOSHUA PINK, received benefits under the medical payments provisions of an automobile insurance policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

6. Please admit that Plaintiff, JOSHUA PINK, is subject to a deductible under the Personal Injury Protection portion of an automobile insurance policy.

7. Please admit that Plaintiff, JOSHUA PINK received benefits pursuant to personal or group health insurance policy, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

8. Please admit that Plaintiff, JOSHUA PINK, received benefits pursuant to a personal or group wage continuation plan or policy, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

9. Please admit that on the date of the accident alleged in your Complaint, Defendant, MATHEW ZUMBRUM, complied with and met the security requirements under Chapter 627.730 - 627.7405, Florida Statutes.

10. Please admit that Plaintiff, JOSHUA PINK, was partially responsible for the subject accident.

11. Please admit that Plaintiff, JOSHUA PINK, did **NOT** suffer a permanent injury as a result of the subject accident.

I HEREBY CERTIFY that on the 6th day of December, 2022 a true and correct copy of the foregoing was electronically filed with the Florida Courts E-Filing Portal system which will

send a notice of electronic filing to Michael R. Vaughn, Esq., Morgan & Morgan, P.A., 20 N. Orange Ave, 16th Floor, Orlando, FL 32801 at mvaughn@forthepeople.com; jburnham@forthepeople.com; mserrano@forthepeople.com.

ANDREW J. GORMAN & ASSOCIATES

BY:



(Original signed electronically by Attorney.)
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