

CASSANDRA JACKSON MCLOYD,  
Plaintiff,

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND  
FOR ORANGE COUNTY, FLORIDA

vs.

TRIPLE R TRUCKING OF LAURENS  
IOWA INC. AND CHRISTIAN HELMUT  
FRINGS,

Case No.: 2021-CA-003540-O

Defendants.

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**DEFENDANT, TRIPLE R TRUCKING OF LAURENS IOWA INC.'S**  
**REQUEST FOR ADMISSIONS TO PLAINTIFF**

**COMES NOW**, TRIPLE R TRUCKING OF LAURENS IOWA INC., (hereinafter referred to by name or as “Defendant TRIPLE R” or as “TRIPLE R”) named as a Defendant herein, by special appearance, by and through its undersigned counsel, and without waiving jurisdiction or any jurisdictional defenses, including but not limited to lack of jurisdiction over the person; lack of jurisdiction over the subject matter; insufficiency of service of process; insufficiency of process, and failure to state a cause of action; as well as all defenses, both mandatory and discretionary provided for under Florida law, and hereby, in accordance with Rule 1.370, Florida Rules of Civil Procedure, requests the Plaintiff, CASSANDRA JACKSON MCLOYD, (hereinafter referred to as “Plaintiff” or “YOU” or “YOUR”), to admit, in this action, that each of the following statements are true:

1. Please admit Plaintiff received benefits from a collateral source, as defined by §627.7372 or §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 Plaintiff is entitled to receive benefits from a collateral source as defined in §627.7372 or §768.76, Florida Statutes, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
3. Please admit Plaintiff received benefits from a collateral source, as defined by §627.7372 or §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.

4. Please admit Plaintiff 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.

5. Please admit Plaintiff 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.

6. Please admit Plaintiff 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.

7. Please admit Plaintiff is entitled to receive 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.

8. Please admit Plaintiff 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.

9. Please admit Plaintiff is entitled to receive 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.

10. Please admit Plaintiff 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.

11. Please admit Plaintiff is entitled to receive 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.

12. Please admit that Plaintiff had an available, functional and operational seat belt/shoulder harness restraint system in the automobile you were driving at the time and place of the incident described in the Complaint.

13. Please admit that the Plaintiff was not using the available, functional and operational seat belt/shoulder harness restraint system located within the automobile you were driving at the time and place of the incident described in the Complaint.

14. Please admit Plaintiff's use of the available, functional and operational seat belt/shoulder harness restraint system, at the time and place of the incident described in the Complaint, would have prevented or lessened the injury and damage alleged by Plaintiff.

15. Please admit this action is subject to the Florida Motor Vehicle No-Fault Law, §§627.730 - 627.7405, Florida Statutes.

16. Please admit that Defendants, TRIPLE R TRUCKING OF LAURENS IOWA INC. and CHRISTIAN HELMUT FRINGS, are entitled to receive a set-off from any future jury award to the Plaintiff, in the amount of all Personal Injury Protection benefits paid to the Plaintiff or on behalf of the Plaintiff as a result of the incident described in the Complaint.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the E-filing Portal, and that a copy was served via Electronic Mail on the 17<sup>th</sup> day of June 2022 to: Dane Jordan, Esquire, Morgan & Morgan, P.A., 20 N. Orange Avenue, 16th FL, Orlando, FL 32801, [djordan@forthepeople.com](mailto:djordan@forthepeople.com); [smoler@forthepeople.com](mailto:smoler@forthepeople.com); [joannem@forthepeople.com](mailto:joannem@forthepeople.com).

/s/ Matthew R. Schreck  
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