

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, FLORIDA
CIVIL DIVISION

AUTUMN THORNE,

CASE NO: 2022CA002536CAAXW

Plaintiff,

v.

WILLIAM ANGELUS,

Defendant. /

DEFENDANT, WILLIAM ANGELUS'S
REQUEST FOR ADMISSIONS TO PLAINTIFF

Defendant, WILLIAM ANGELUS, by and through undersigned counsel, files this Request for Admissions pursuant to Rule 1.370, Florida Rules of Civil Procedure, requiring the Plaintiff, AUTUMN THORNE to admit under oath within thirty (30) days from the date hereof, the truthfulness of the following:

1. At the time of the accident that is the subject of this lawsuit, the vehicle in which you were riding had a fully operational seat belt that was available for your use.
2. At the time of the accident that is the subject of this lawsuit, the vehicle in which you were riding had a fully operational shoulder harness that was available for your use.
3. You were not wearing the available and fully operational seat belt at the time of the accident.
4. You were not wearing the available and fully operational harness at the time of the accident.
5. Your failure to use the seat belt or harness produced or contributed substantially to at least a portion of your claimed damages.
6. Your failure to use the seat belt as set forth above was unreasonable under the circumstances.
7. Your failure to use this shoulder harness as set forth above was unreasonable under the circumstances.

8. The claims of the Plaintiff are subject to the provisions of the "Florida Vehicle No-Fault Law."
9. Please admit that all lost wages incurred by you in connection with the injuries you allegedly sustained as a result of the incident alleged herein, have been paid by collateral sources.
10. Please admit that all medical expenses incurred by you in connection with the injuries you allegedly sustained as a result of the incident alleged herein, have been paid by collateral sources.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been e-served through the Florida Courts E-filing Portal or email to Darrell W. Kropog, Jr., Esquire, Morgan & Morgan Tampa, P.A., One Tampa City Center, 201 N. Franklin Street, 7th Floor, Tampa, FL 33602 at dwkpleadings@forthepeople.com; cwills@forthepeople.com; this 18th day of October 2022.

/S/ Gregory D. Jones

Gregory D. Jones, Esquire

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