

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

CASE NO: 2022-CA-9686

ANA VARGAS,

Plaintiff,

vs,

CARLINE FRAGELICE, JORES COLAS,  
AND GEICO GENERAL INSURANCE  
COMPANY

Defendants.

---

DEFENDANT, GEICO GENERAL INSURANCE COMPANY:  
REQUEST FOR ADMISSION TO PLAINTIFF,  
ANA VARGAS

YOU ARE HEREBY NOTIFIED that you are requested to admit the truth of the matters of fact hereinafter set forth on the thirtieth (30) day after service hereof, by answers in writing, under oath; the matters requested to be admitted are attached hereto and by reference made a part hereof.

REQUEST FOR ADMISSION

1. Please admit that all medical bills incurred by you in connection with the injuries you sustained as a result of the accident alleged herein have been paid by collateral sources. If you deny this Request, please respond to attached and included Interrogatory #1.
2. Please admit that you did own the vehicle you occupied on the date of the subject motor vehicle accident.

3. Please admit that you did not own the vehicle you occupied on the date of the subject motor vehicle accident.
4. Please admit that you have applied for PIP benefits with an automobile insurance carrier for injuries and treatment you believe are related to the subject motor vehicle accident.
5. Please admit that you have applied for Medical Payments benefits with an automobile insurance carrier for injuries and treatment you believe are related to the subject motor vehicle accident.

#### INTERROGATORY

1. If you deny the above Request for Admission Number one, please set forth, with particularity, each and every medical bill you are claiming has not been paid by collateral sources.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service to Adrienn Toth, Esq, Morgan & Morgan, P.A., at [atoth@forthepeople.com](mailto:atoth@forthepeople.com), [emilysmith@forthepeople.com](mailto:emilysmith@forthepeople.com), and [vanessac@forthepeople.com](mailto:vanessac@forthepeople.com), on this 20th day of December, 2022.



Kendall B. Rigdon, Esq  
Florida Bar No.: 046647  
Eric V. Tourian, Esq.  
Florida Bar No.: 17106  
✓ Mark A. Cavins, Esq.  
Florida Bar No.: 121489  
[eService@rigdonalexander.com](mailto:eService@rigdonalexander.com)  
Rigdon Alexander & Rigdon LLP  
125 Tangerine Avenue  
Merritt Island, FL 32953  
(321) 452-4111 - phone  
(321) 452-4133 - fax

Counsel for Defendant,  
GEICO GENERAL INSURANCE COMPANY

I HEREBY CERTIFY AND SWEAR THAT THE ANSWERS TO INTERROGATORIES ARE TRUE AND COMPLETE IN ALL RESPECTS:

\_\_\_\_\_  
ANA VARGAS

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

The foregoing instrument was acknowledged before me, by means of ☐ physical presence or ☐ online notarization, this \_\_\_\_ day of \_\_\_\_\_, 2022, by ANA VARGAS who is personally known to me or has produced \_\_\_\_\_ as identification, and being duly sworn, on oath, deposes and says that the foregoing Answers to Interrogatories propounded by Defendant are true and correct to the best of his/her knowledge and that he/she has read the foregoing Answers to Interrogatories and knows the contents thereof.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_ day of \_\_\_\_\_, 2022.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: