

**IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT IN AND
FOR BROWARD COUNTY, FLORIDA**

CASE NO.: CACE-22-8782

MONTIQUE SIMPKINS,

Plaintiff,

vs.

KARL'S PUMPING & PLACING, INC., and
GENTLE ROBINSON,

Defendants.

**DEFENDANT, KARL'S PUMPING & PLACING, INC.'S
FIRST REQUEST FOR ADMISSION TO PLAINTIFF**

COMES NOW, Defendant, KARL'S PUMPING & PLACING, INC. ("Karl's Pumping"), by and through undersigned counsel, pursuant to the applicable Florida Rules of Civil Procedure, hereby serve their First Request for Admission upon Plaintiff and respectfully request that she provide her Answers to the following, within thirty (30) days:

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

ANSWER:

2. Plaintiff received or is entitled to receive benefits from a collateral source, as defined by Florida Statute 627.7372 or Florida Statute 768.76, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

ANSWER:

3. Plaintiff received or is entitled to receive 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.

ANSWER:

4. Plaintiff received or is entitled to receive 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 incident described in the Complaint.

ANSWER:

5. Plaintiff received or 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.

ANSWER:

6. Plaintiff is subject to a deductible under the Personal Injury Protection portion of an automobile insurance policy.

ANSWER:

7. Plaintiff received or 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 incident described in the Complaint.

ANSWER:

8. Plaintiff received or 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.

ANSWER:

9. This action is subject to the Florida Motor Vehicle No-Fault Law, Florida Statute Sections 627.730 - 627.7405.

ANSWER:

10. This action is subject to an apportionment of damages under the Florida Doctrine of Comparative Fault, Florida Statute 768.81.

ANSWER:

11. Plaintiff was involved in a prior motor vehicle accident which took place on October 21, 2020 and sustained bodily injuries and property damage.

ANSWER:

12. At the time of Plaintiff's October 21, 2020 motor vehicle accident, Plaintiff maintained a liability insurance policy through United Automobile Insurance Company ("United Auto").

ANSWER:

13. Plaintiff was also involved in a prior motor vehicle accident which occurred on November 9, 2015 and sustained bodily injuries.

ANSWER:

14. At the time of Plaintiff's November 9, 2015 motor vehicle accident, Plaintiff maintained a liability insurance policy through Progressive.

ANSWER:

15. Plaintiff was also involved in a prior motor vehicle accident which occurred on March 3, 2011 and sustained bodily injuries.

ANSWER:

16. At the time of Plaintiff's March 3, 2011 motor vehicle accident, Plaintiff maintained a liability insurance policy through Liberty Mutual Insurance Company ("Liberty

Mutual”).

ANSWER:

17. Plaintiff was also involved in a prior motor vehicle accident which occurred on November 9, 2010, and sustained bodily injuries.

ANSWER:

18. At the time of Plaintiff's November 9, 2010 motor vehicle accident, Plaintiff maintained a liability insurance policy through Liberty Mutual.

ANSWER:

19. Plaintiff was also involved in a prior motor vehicle accident which occurred on October 6, 2009 and sustained bodily injuries.

ANSWER:

20. At the time of Plaintiff's October 6, 2009 motor vehicle accident, Plaintiff maintained a liability insurance policy through Government Employee's Insurance Company (“GEICO”).

ANSWER:

21. Plaintiff was also involved in a prior motor vehicle accident which occurred on January 15, 2007 and sustained bodily injuries.

ANSWER:

22. At the time of Plaintiff's January 15, 2007 motor vehicle accident, Plaintiff maintained a liability insurance policy through State Farm and/or MGA Insurance Company, Inc.

ANSWER:

23. Plaintiff was also involved in a subsequent motor vehicle accident which occurred on September 17, 2021 and sustained bodily injuries.

ANSWER:

24. At the time of Plaintiff's September 17, 2021, motor vehicle accident, Plaintiff maintained a liability insurance policy through State Farm.

ANSWER:

25. The alleged bodily injuries that Plaintiff claims in the above-referenced lawsuit were caused by prior motor vehicle accidents which occurred on the following dates: (1) October 21, 2020; (2) November 9, 2015; (3) March 3, 2011; (4) November 9, 2010; (5) October 6, 2009; and/or (6) January 15, 2007.

ANSWER:

26. On the dates of the Incident described in the Complaint, Plaintiff was evaluated by Miramar Fire Rescue and elected not to be transported to a nearby medical facility.

ANSWER:

At the place and time of the Incident described in the Complaint in this civil action, Plaintiff was the owner and operator of a gray colored, four-door, 2017 Kia Optima (VIN # 5XXGT4L33HG148432) bearing Florida License Tag No. IZEW99 .

ANSWER:

27. Plaintiff drove herself to the Pembroke Memorial Hospital following the Incident.

ANSWER:

28. Plaintiff also received post-incident medical care and treatment at Golden Lakes Medical Center.

ANSWER:

29. Plaintiff has achieved maximum medical improvement from a chiropractic standpoint.

ANSWER:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of July 2022, a true and correct copy of the forgoing original document was served via Electronic Mail to all Counsel listed below.

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