

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,  
IN AND FOR VOLUSIA COUNTY, FLORIDA

DAVID CHAPPELL,

Plaintiff,

v.

Case No.: 2022-30434-CICI

KELLY TOWLES, TRUE TRANSPORT, INC.,  
AND FEDEX GROUND PACKAGE SYSTEM,  
INC.,

Defendants.

**DEFENDANT, FEDEX GROUND PACKAGE SYSTEM, INC.'S  
REQUEST FOR ADMISSIONS DIRECTED TO PLAINTIFF, DAVID CHAPPELL**

Pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, Defendant, FEDEX GROUND PACKAGE SYSTEM INC., hereby requests that Plaintiff, DAVID CHAPPELL, admit or deny each of the following:

1. ADMIT that the injuries that you claim are a result of the subject incident that is referenced in the Complaint, pre-date and pre-exist the date of the subject incident.
2. ADMIT that before the subject incident that is referenced in the Complaint, you sustained an injury to one or more of the same body part(s) as the body part(s) you are alleging injury(ies) to in this lawsuit.
3. ADMIT that you have been involved in a motor vehicle incident which pre-dates the subject incident that is referenced in the Complaint, either as a driver, passenger or pedestrian.
4. ADMIT that one (1) or more of your prior treating physicians opined that you sustained permanent injuries in any a motor vehicle incident(s) which pre-date(s) the subject incident that is referenced in the Complaint.
5. ADMIT that you have been involved in a slip or trip and fall-type, or other non-

motor vehicle incident, prior to the subject incident that is referenced in the Complaint.

6. ADMIT that one (1) or more of your prior treating physicians opined that you sustained permanent injuries in said prior slip or trip and fall-type or other non-motor vehicle incident.

7. ADMIT that you were suffering from a disability prior to the date of the subject incident that is referenced in the Complaint.

8. ADMIT that you have previously been involved in litigation where you sued someone for damages.

9. ADMIT that you have previously settled a claim either pre-suit or during litigation for personal injury and executed a release.

10. ADMIT that you have made one or more worker's compensation claims during your lifetime.

11. ADMIT that you have made a worker's compensation claim as a result of this collision.

12. ADMIT that you have not incurred any out-of-pocket expenses as a result of the subject incident that is referenced in the Complaint.

13. ADMIT that you have private health insurance coverage through some source that would provide coverage for the medical expenses you allege to have incurred and are seeking as damages in this lawsuit.

14. ADMIT that you have received benefits pursuant to a personal or group health insurance policy that provide coverage or payment for medical expenses you allege to have incurred and are seeking as damages in this lawsuit.

15. ADMIT that you have received other benefits through a collateral source provider,

including but not limited to workman's compensation, Social Security, or Medicaid/Medicare, for all or a portion of the damages that you allege resulted from the subject incident that is referenced in the Complaint.

16. ADMIT that no medical provider has expressed a medical opinion that you have sustained a permanent injury as a result of the subject incident that is referenced in the Complaint.

17. ADMIT that you suffered no permanent and/or significant scarring as a result of the subject incident that is referenced in the Complaint.

18. ADMIT that you have a prior felony conviction.

19. ADMIT that you have a prior conviction involving dishonesty or the making of a false statement.

20. ADMIT that you had consumed alcohol or an alcoholic beverage within six (6) hours prior to the occurrence of the subject incident that is alleged in the Complaint.

21. ADMIT that you had taken drugs or medications within six (6) hours prior to the occurrence of the subject incident that is alleged in the Complaint.

22. ADMIT that there was a video camera or other video recording device in your vehicle on the date of the subject accident.

23. ADMIT that a video camera or other video recording device in your vehicle recorded anything within five minutes before, during, and/or within 5 minutes after the subject accident.

24. ADMIT that you have, at any time, been in possession of video footage of any part of the subject accident.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 9, 2022, a true and correct copy of the foregoing was furnished by electronic service pursuant to Fla. R. Jud. Admin. 2.516 to: Paola Ramos, Esq., MORGAN & MORGAN, P.A., 200 Broadway Ave., Kissimmee, FL 34741, [paolaramos@forthepeople.com](mailto:paolaramos@forthepeople.com); [svandervelde@forthepeople.com](mailto:svandervelde@forthepeople.com); *Counsel for Plaintiff*.

**CALLAHAN & FUSCO, LLC**

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