

**IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR COLLIER COUNTY, FLORIDA
CIVIL DIVISION
CASE NO: 22-CA-813**

DEVIN WILLIAMS,

Plaintiff,

-v-

JOHN WHITE,

Defendant.

_____ /

PLAINTIFF'S RESPONSE TO REQUEST FOR ADMISSIONS

Plaintiff, DEVIN WILLIAMS, by and through the undersigned attorney, responds to the Request for admissions of Defendant, JOHN WHITE, served the 24th day of June, 2022, as follows:

1. That at the time of the accident in question you were not wearing a helmet.

ANSWER: Admit.

2. That your failure to use a helmet at the time of the accident in question was unreasonable.

ANSWER: Deny.

3. That your failure to use the helmet at the time of the accident in question produced or contributed substantially to producing your injuries.

ANSWER: Deny.

4. 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: Deny.

5. This action is subject to the Florida Motor Vehicle No-fault Law, Florida Statute Sections 627.730 through 627.7405, inclusive.

ANSWER: Admit.

6. At the time and place of the incident described in the Complaint, Defendant complied with the provisions and security requirements set forth in Florida Statute 627.737(1).

ANSWER: Deny.

7. Plaintiff is an insured person under the Personal Injury Protection portion of an automobile insurance policy which was in force on the date of the incident described in the Complaint which provides payment of benefits of eighty (80%) percent of all reasonable and necessary medical expenses incurred and sixty (60%) percent of loss of income or earning capacity from inability to work as a result of injury sustained from the incident described in the Complaint to a maximum of Ten Thousand Dollars (\$10,000.00).

ANSWER: Deny.

8. 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: Deny.

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

ANSWER: Deny.

10. 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: Deny.

11. 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 the incident described in the Complaint.

ANSWER: Deny.

12. 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: **Deny.**

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

ANSWER: **Deny.**

14. 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 the incident described in the Complaint.

ANSWER: **Admit.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished, by email, this 30th day of June, 2022 to: Mitchell H. Katler, Esquire, Law Offices of James W. Kehoe, III, 3230 West Commercial Blvd., Suite 250, Fort Lauderdale, FL. 33309, mkatler@traveleres.com; eguilbea@travelers.com; tgruende@travelers.com.

_____/s/ Derrick Isaac_____
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