

IN THE CIRCUIT COURT OF THE
9TH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY,
FLORIDA

CASE NO. 2022-CA-004353-O

JAMES REYNOLDS,

Plaintiff,

v.

BRIAN DONOHUE, KAYLA MCCUE, AND
KAYLIN SALLADAY,

Defendants.

DEFENDANT'S, KAYLA MCCUE,
FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF, JAMES REYNOLDS

COMES NOW, Defendant, KAYLA MCCUE, by and through her undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.370, hereby requests that the Plaintiff, JAMES REYNOLDS, admit or deny the following statements:

1. You have received medical payments coverage benefits as a result of the subject accident.
2. You sustained no permanent injury as a result of the subject accident.
3. You have no out-of-pocket expenses related to the subject accident.
4. No medical provider has expressed a medical opinion that you have sustained a permanent injury as a result of the subject accident.
5. You received no permanent and/or significant scarring as a result of the subject accident.
6. You were not wearing your seatbelt at the time of the subject accident.
7. You did not lose any wages or income as a result of the subject accident.
8. Your earning capacity was not reduced or impaired as a result of the subject accident.

9. Your ability to enjoy life has not been reduced or impaired as a result of the subject accident.
10. You have been involved in one (1) or more motor vehicle accidents prior to the subject accident.
11. You sustained significant and permanent injuries in said prior motor vehicle accidents.
12. You have been involved in one (1) or more motor vehicle accidents subsequent to the subject accident.
13. You sustained significant and permanent injury in said subsequent motor vehicle accidents.
14. You have been involved in one (1) or more slip and fall type or other non-motor vehicle accidents prior to the subject accident.
15. You sustained significant and permanent injuries in the prior slip and fall type or other non-motor vehicle type accidents.
16. You have been involved in one (1) or more slip and fall type or other non-motor vehicle accidents subsequent to the subject accident.
17. You sustained significant and permanent injuries in the subsequent slip and fall type or other non-motor vehicle accidents.
18. Some or all of your injuries that you are claiming damages for in this matter pre-existed the subject accident.
19. You are able to perform the same tasks you were able to do prior to the subject accident.
20. You had been drinking alcohol within six (6) hours prior to the subject accident.
21. You took drugs and/or medication within six (6) hours prior to the subject accident.
22. You had a herniated disc prior to the subject accident.
23. You complained of pain in your neck prior to the subject accident.
24. You complained of pain in your back prior to the subject accident.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Florida Courts E-Filing Portal and/or email, unless otherwise indicated, to the parties on the attached service list attached, and to all parties who may be listed for service via the E-Filing Portal but of whom the undersigned has not received service information, on October 10, 2022.

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