

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

CASE NO. 2022-CA-009214-O

EMANUEL OYOLA PEREZ,

Plaintiff,

v.

TAYLOR JACKSON and LIBERTY MUTUAL
PERSONAL INSURANCE COMPANY,

Defendants.

_____ /

**DEFENDANT, TAYLOR JACKSON, FIRST REQUEST FOR ADMISSIONS TO
PLAINTIFF**

Defendant, TAYLOR JACKSON (hereinafter “Defendant”), by and through the undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.370, hereby, requests Plaintiff, EMANUEL OYOLA PEREZ (hereinafter “Plaintiff”), admit that each of the following statements are true:

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

3. Please admit Plaintiff received benefits from a collateral source, as defined by §768.76, Florida Statutes, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

4. Please admit Plaintiff is entitled to receive benefits from a collateral source, as defined by §768.76, Florida Statutes, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

5. Please admit Plaintiff received 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.

6. Please admit Plaintiff is entitled to receive benefits under the Personal Injury Protection portion of an automobile policy for medical bills alleged to have been sustained as a result of the incident described in the Complaint.

7. Please admit Plaintiff received 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.

8. Please admit Plaintiff 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.

9. Please admit Plaintiff received 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.

10. Please admit Plaintiff 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.

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

12. Please admit Plaintiff received 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.

13. Please admit Plaintiff 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.

14. Please admit Plaintiff received 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.

15. Please admit Plaintiff 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.

16. Please admit Plaintiff, at the time and place of the incident described in the Complaint, had available a functional and operational seat belt/shoulder harness restraint system.

17. Please admit Plaintiff, at the time and place of the incident described in the Complaint, was not using the available functional and operational seat belt/shoulder harness restraint system.

18. Please admit Plaintiff's use of the available functional and operational seat belt/shoulder harness restraint system, at the time and place of the incident described in the Complaint, would have prevented or lessened the injury and damage alleged by Plaintiff.

19. Please admit this action is subject to the Florida Motor Vehicle No-Fault Law, §§627.730 - 627.7405, Florida Statutes.

20. Please admit 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 percent (80%) of all reasonable and necessary medical expenses incurred and sixty percent (60%) 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).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 14, 2022, I electronically filed the foregoing with the Clerk of the Court using the Florida E-Portal system. I further certify that a true and correct copy hereof has been furnished via email to Michael Vaughn, Esquire (mvaughn@forthepeople.com; jburnham@forthepeople.com; mserrano@forthepeople.com).

/s/David R. Kuhn

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