IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.: 2021-017399-CA-01

JEFFERY PETRUS,

       Plaintiff,

vs.

RONEY REID and TROPICAL SANITATION,
INC.,

       Defendants.

_____/.

DEFENDANT'S FIRST REQUEST FOR ADMISSIONS TO PLAINTIFF

Defendant, TROPICAL SANITATION, INC., pursuant to Florida Rule of Civil

Procedure 1.370, requests that Plaintiff admit or deny the following assertions of fact:

1.   Plaintiff has not sustained an injury as a result of the subject accident.

2.   Plaintiff has not sustained a permanent injury as a result of the subject accident.

3.   Plaintiff has not sustained any lost wages as a result of the subject accident.

4.   Plaintiff is not making a wage loss claim as a result of the subject accident.

5.   Plaintiff is not making a claim for loss of future earning capacity as a result of the

subject accident.

6.   The Defendant's insurer previously settled the property damage claim.

7.   Defendant satisfied Plaintiff's property damage claims.

8.   Plaintiff had Personal Injury Protection coverage of $10,000.

9.   Defendant is entitled to a set-off of $10,000.

10.   Plaintiff was self-insured for $10,000 PIP limits at the time of this accident.

11.   Plaintiff has not sustained any out-of-pocket medical expenses in connection with the subject accident.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Electronic Mail, to all counsel of record on the attached Service List, this 22nd day of June, 2022.

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