

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA
CIVIL DIVISION
Case No.: 2022-CA-02612

JEREMIAH RILEY,

Plaintiff,

vs.

PLATINUM DRYWALL SOUTH, LLC
and VICTOR GARCIA,

Defendants.

_____ /

DEFENDANTS' FIRST REQUEST FOR ADMISSIONS

The Defendants, PLATINUM DRYWALL SOUTH, LLC and VICTOR GARCIA, by and through their undersigned counsel, pursuant to the Florida Rules of Civil Procedure, Rule 1.370, request the Plaintiff, JEREMIAH RILEY, to admit in the above-styled action the truth of each of the following statements:

1. Plaintiff must prove at least one of the following in order to recover any non-economic damages on the Plaintiff's personal injury claim:
 - a. significant and permanent loss of an important bodily function;
 - b. permanent injury within a reasonable degree of medical probability other than scarring or disfigurement;
 - c. significant and permanent scarring or disfigurement.
2. That at the time and place described in the Plaintiff's Complaint, you were not utilizing the seatbelt/shoulder harness restraint system.

3. Plaintiff received or is entitled to receive benefits under a 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.
4. Plaintiff received or is entitled to receive benefits pursuant to a personal or group health insurance policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
5. As a result of the collision which is the subject of this litigation, you were not permanently injured.
6. As a result of the collision which is the subject of this litigation, you did not lose any earnings in the past.
7. As a result of the collision which is the subject of this litigation, you have not lost the ability to earn money in the future.
8. Prior to the collision which is the subject of this litigation, you had a pre-existing condition to the area of your body which you claim was injured in the collision which is the subject of this litigation.
9. Prior to the collision which is the subject of this litigation, you injured an area of your body which you claim was injured in the collision which is the subject of this litigation.
10. Prior to the collision which is the subject of this litigation, you had been involved in a motor vehicle accident in which you sustained an injury.
11. As a result of the collision which is the subject of this litigation, you have not sustained any physical scarring.

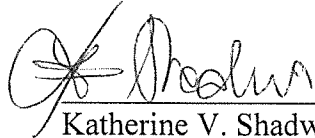
12. As a result of the collision which is the subject of this litigation, you have not been disfigured.
13. That at the time and place described in the Plaintiff's Complaint, you were using a cell phone.
14. You had the assistance of counsel in answering these admissions.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been sent by email to the following on the 2nd day of September, 2022:

Peter van den Boom, B.C.S.
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