

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,  
IN AND FOR SEMINOLE COUNTY, FLORIDA

CASE NO: 2022-CA-002568

KAREN DOMMAR,

Plaintiff,

v.

NAZIA AHMAD and  
THE STANDARD FIRE  
INSURANCE COMPANY,

Defendant.

/

**DEFENDANT THE STANDARD FIRE INSURANCE COMPANY**  
**FIRST REQUEST FOR ADMISSIONS DIRECTED TO PLAINTIFF**

COMES NOW the Defendant, THE STANDARD FIRE INSURANCE COMPANY, by and through its undersigned attorney and pursuant to Rule 1.370 of the Florida Rules of Civil Procedure, file this Request for Admissions and request the Plaintiff, KAREN DOMMAR, admit or deny the following:

1. That at the time of the incident which is the subject of this lawsuit, the vehicle which is subject to this lawsuit had a fully operational seat belt which was available to you.

2. That you were not wearing the available and fully operational seat belt described above at the time of the collision which is the subject of this lawsuit.

3. That this failure to wear a seat belt produced or contributed substantially to producing at least a portion of the damage claimed by you.

4. Your failure to use the seat belt as set forth above was unreasonable under the circumstances.

5. Plaintiff received benefits from a collateral source, as defined by Florida Statute 768.76, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

6. Plaintiff received benefits from a collateral source, as defined by Florida Statute 768.76, for loss of wages or income alleged to have been incurred as a result of the incident described in the Complaint.

7. 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.

8. Plaintiff received benefits under the Personal Injury Protection portion of an automobile policy for loss of wages or income alleged to have been incurred as a result of the incident described in the Complaint.

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

11. 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.

12. Plaintiff received benefits pursuant to a personal or group wage continuation plan or policy, for loss of wages or income alleged to have been incurred as a result of the incident described in the Complaint.

13. This action is subject to the Florida Motor Vehicle No-Fault Law, Florida Statute Sections 627.730-627.7405.

14. Plaintiff is an insured person under the Personal Injury Protection portion of an automobile insurance policy which was in full force on the date of the incident described in the Complaint which provides payment of benefits of eighty (80%) per cent of all reasonable and necessary medical expenses incurred and sixty (60%) per cent 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 (\$10,000.00) Dollars.

15. That the Plaintiff was involved in one or more motor vehicle accidents before the incident that is subject of this lawsuit.

16. That the Plaintiff was involved in one or more motor vehicle accidents after the incident that is subject of this lawsuit.

17. That the Plaintiff received bodily injuries related to the motor vehicle accidents he was involved in before the incident that is subject of this lawsuit.

18. That the Plaintiff received bodily injuries related to the motor vehicle accidents he was involved in after the incident that is subject of this lawsuit.

19. Plaintiff has exhausted his benefits under the Personal Injury Protection portion of his automobile policy as a result of the incident described in the Complaint.

20. Plaintiff has exhausted his benefits under the MedPay portion of his automobile policy as a result of the incident described in the Complaint.

21. Admit that the Defendant is entitled to a collateral source set off for any PIP benefits received by the Plaintiff from his automobile insurance company related to the subject motor vehicle accident.

22. Admit that the Defendant is entitled to a collateral source set off for any MedPay benefits received by the Plaintiff from his automobile insurance company related to the subject motor vehicle accident.

23. Admit that the Plaintiff did not receive a permanent injury as a result of the subject motor vehicle accident.

24. Admit that the Plaintiff received health care insurance benefits related to medical treatment for injuries he is claiming are related to the subject motor vehicle accident.

25. Admit that the Defendant is entitled to a collateral source set off for any adjustments to medical bills as a result of health insurance benefits that the Plaintiff received related to medical treatment for injuries he is claiming are related to the subject motor vehicle accident.

26. Admit that the Plaintiff has obtained a legal financing loan and/or financial settlement from a third party against the future settlement proceeds or jury verdict in this action.

### **CERTIFICATE OF SERVICE**

I 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 15<sup>th</sup> day of December 2022.

/s/ Kristen Knappenberger, Esq.  
Kristen Knappenberger, Esquire  
Fla. Bar. No.: 121566  
Law Offices of Jack D. Evans  
2420 Lakemont Avenue, Suite 125  
Orlando, Florida 32814  
Telephone: (407) 388-2915  
Facsimile: (855) 203-0311  
Attorney for Defendant The Standard Fire  
Insurance Company

[kknappen@travelers.com](mailto:kknappen@travelers.com)  
[jdeorlan@travelers.com](mailto:jdeorlan@travelers.com)  
[jkjoseph@travelers.com](mailto:jkjoseph@travelers.com)

**SERVICE LIST**

Jonathan D. Thomson, Esq., Morgan & Morgan, P.A., 20 N. Orange Avenue, 16<sup>th</sup> Floor  
Orlando, FL 32801 Attorney for Plaintiff.

Email: [jonathan@forthepeople.com](mailto:jonathan@forthepeople.com); [heathermorgan@forthepeople.com](mailto:heathermorgan@forthepeople.com);  
[qthomas@forthepeople.com](mailto:qthomas@forthepeople.com)