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

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| JAMES REYNOLDS,   Plaintiff,  v.  BRIAN DONOHUE, KAYLA MCCUE, AND KAYLIN SALLADAY,   Defendants.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/ |  |  | Case No. 2022-CA-004353-0 |

**REQUEST FOR ADMISSION NO. 1:**

You have received medical payments coverage benefits as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

**REQUEST FOR ADMISSION NO. 2:**

You sustained no permanent injury as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

**REQUEST FOR ADMISSION NO. 3:**

You have no out-of-pocket expenses related to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

**REQUEST FOR ADMISSION NO. 4:**

No medical provider has expressed a medical opinion that you have sustained a permanent injury as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

**REQUEST FOR ADMISSION NO. 5:**

You received no permanent and/or significant scarring as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

**REQUEST FOR ADMISSION NO. 6:**

You were not wearing your seatbelt at the time of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

**REQUEST FOR ADMISSION NO. 7:**

You did not lose any wages or income as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

**REQUEST FOR ADMISSION NO. 8:**

Your earning capacity was not reduced or impaired as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

**REQUEST FOR ADMISSION NO. 9:**

Your ability to enjoy life has not been reduced or impaired as a result of the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

**REQUEST FOR ADMISSION NO. 10:**

You have been involved in one (1) or more motor vehicle accidents prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

**REQUEST FOR ADMISSION NO. 11:**

You sustained significant and permanent injuries in said prior motor vehicle accidents.

**RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

**REQUEST FOR ADMISSION NO. 12:**

You have been involved in one (1) or more motor vehicle accidents subsequent to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

**REQUEST FOR ADMISSION NO. 13:**

You sustained significant and permanent injury in said subsequent motor vehicle accidents.

**RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

**REQUEST FOR ADMISSION NO. 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.

**RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

**REQUEST FOR ADMISSION NO. 15:**

You sustained significant and permanent injuries in the prior slip and fall type or other non- motor vehicle type accidents.

**RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

**REQUEST FOR ADMISSION NO. 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.

**RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

**REQUEST FOR ADMISSION NO. 17:**

You sustained significant and permanent injuries in the subsequent slip and fall type or other non-motor vehicle accidents.

**RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

**REQUEST FOR ADMISSION NO. 18:**

Some or all of your injuries that you are claiming damages for in this matter pre-existed the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

**REQUEST FOR ADMISSION NO. 19:**

You are able to perform the same tasks you were able to do prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

**REQUEST FOR ADMISSION NO. 20:**

You had been drinking alcohol within six (6) hours prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

**REQUEST FOR ADMISSION NO. 21:**

You took drugs and/or medication within six (6) hours prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

**REQUEST FOR ADMISSION NO. 22:**

You had a herniated disc prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

**REQUEST FOR ADMISSION NO. 23:**

You complained of pain in your neck prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

**REQUEST FOR ADMISSION NO. 24:**

You complained of pain in your back prior to the subject accident.

**RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

Dated: January 03, 2023

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|  | Morgan & Morgan  8151 Peters Road, Suite 4000  Plantation, FL 33325  (954) 318-0268  By:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Attorneys for Plaintiff JAMES REYNOLDS |

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon the following via [email/U.S. Mail/fax/hand delivery] on January 03, 2023:

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| Matthew R. Olmsted, Esq \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |

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|  | By:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |  |