**IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT  
IN AND FOR POLK COUNTY, FLORIDA**

|  |  |  |  |
| --- | --- | --- | --- |
| JEREMIAH RILEY,   Plaintiff,  v.  PLATINUM DRYWALL SOUTH, LLC AND VICTOR GARCIA,   Defendants.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/ |  |  | Case No. 2022-CA-02612 |

**REQUEST FOR ADMISSION NO. 1:**

Plaintiff must prove at least one of the following in order to recover any non- economic damages on the Plaintiffs 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.

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

**REQUEST FOR ADMISSION NO. 2:**

That at the time and place described in the Plaintiffs Complaint, you were not utilizing the seatbelt/shoulder harness restraint system.

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

**REQUEST FOR ADMISSION NO. 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.

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

**REQUEST FOR ADMISSION NO. 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.

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

**REQUEST FOR ADMISSION NO. 5:**

As a result of the collision which is the subject of this litigation, you were not permanently injured.

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

**REQUEST FOR ADMISSION NO. 6:**

As a result of the collision which is the subject of this litigation, you did not lose any eamings in the past.

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

**REQUEST FOR ADMISSION NO. 7:**

Asa result of the collision which is the subject of this litigation, you have not lost the ability to earn money in the future.

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

**REQUEST FOR ADMISSION NO. 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.

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

**REQUEST FOR ADMISSION NO. 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.

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

**REQUEST FOR ADMISSION NO. 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.

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

**REQUEST FOR ADMISSION NO. 11:**

As a result of the collision which is the subject of this litigation, you have not sustained any physical scarring.

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

**REQUEST FOR ADMISSION NO. 12:**

Asa result of the collision which is the subject of this litigation, you have not been disfigured.

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

**REQUEST FOR ADMISSION NO. 13:**

That at the time and place described in the Plaintiffs Complaint, you were using a cell phone.

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

**REQUEST FOR ADMISSION NO. 14:**

You had the assistance of counsel in answering these admissions.

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

Dated: January 03, 2023

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

**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:

|  |  |
| --- | --- |
| Katherine V. Shadwick, Esquire \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 8950 Dr. M. L. King Jr. Street North, Suite 220, St. Petersburg, FL 33702 kshadwick@rpslaw.net |  |

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