February 19, 2022

*Via E-mail:* <<OPPOSING\_COUNSEL\_NAME>>

<<OPPOSING\_COUNSEL\_EMAIL>>

*RE:**<<PROVIDER\_SUITNAME>> a/a/o <<INJUREDPARTY\_NAME>> v. <<INSURANCECOMPANY\_SUITNAME>>, Case No.* <<INDEXORAAA\_NUMBER>>

Dear Counselor,

Please accept this correspondence as Plaintiff’s request for dates of availability for deposition of Defendant’s Corporate Representative with the most knowledge regarding the claim at issue in the above-referenced matter. The Corporate Representative for the Defendant should be able to testify to the following:

1. Have knowledge and be able to explain all the details of the insurance claim at issue in this case, including all matters investigated by Defendant and the results thereof.

2. Have knowledge and be able to explain all facts upon which Defendant based its decision to deny any portion of the insurance claim at issue in this case.

3. Have knowledge and be able to explain all facts upon which Defendant based its decision to pay any portion of the insurance claim at issue in this case.

4. Have knowledge and be able to explain all provisions of the insurance policy drafted by Defendant that are applicable to the insurance claim at issue in this case and the factual basis which supports any policy exclusion or limitation that is applicable to the insurance claim.

5. Have knowledge and be able to explain all documents and facts upon which Defendant relies upon to form the basis for any affirmative defense being asserted by Defendant in this case.

6. Have knowledge and be able to explain all discovery responses provided by the Defendant.

We ask that the Defendant provide dates of availability for up to three (3) months from the date of this letter to my scheduling assistant at depositions@flinslaw.com. If you fail to provide dates certain within ten (10) days of this letter, we will assume that all dates are available.

Should you wish to discuss this matter further, please feel free to contact my office. Thank you for your anticipated cooperation in this matter.

Sincerely,



Robert F. Gonzalez, Esq.