<<COURT\_NAME>>

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| <<PROVIDER\_SUITNAME>>,  a/a/o <<INJUREDPARTY\_NAME>>    Plaintiff,  vs.  <<INSURANCECOMPANY\_SUITNAME>>  Defendant. | Case No. <<INDEXORAAA\_NUMBER>> |

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**NOTICE OF TAKING DEPOSITION DUCES TECUM**

PLEASE TAKE NOTICE that on <<DEPOSITION\_DATE>> at <<DESPOSITION\_TIME>>, the Plaintiff, <<PROVIDER\_SUITNAME>>, will take the deposition of <<FIELDADJUSTER\_NAME>> who served as the Field Adjuster for <<INSURANCECOMPANY\_SUITNAME>> relating to the subject claim, to be conducted via ZOOM, upon oral examination before a court reporter, or a notary public in and for the State of Florida, or some other officer duly authorized by law to take depositions.

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure and shall continue from day to day, weekends and holidays excepted, until completed.

The deposition is being taken for the purposes of discovery and trial, or for such other purposes as are permitted under the applicable and governing rules.

NOTE: If the deponent requires the assistance of a translator in order to participate in this deposition, please immediately notify the undersigned so arrangements may be made to obtain the same.

**INSTRUCTIONS**

The terms “you”, “your” mean <<FIELDADJUSTER\_NAME>>, or any person, entity or corporation except your own attorney, that is or was acting on behalf of or under the direction of or at the instruction of <<INSURANCECOMPANY\_SUITNAME>> or <<FIELDADJUSTER\_NAME>>, during the relevant time.

The term “dispute” means any of the factual allegations, causes of action or claims for relief that are asserted in the Complaint or any Counterclaim or Crossclaim in this matter.

If not already defined by the request, the relevant time for the purposes of these document requests shall be from the Date of Loss herein to the present.

The term “document” shall include writings, notes, drafts, outlines, recordings and files, regardless of storage media; they include, but are not limited to, writings contained on paper, recordable tape, celluloid, disks, hard drives, electronic mail servers or any other digitally stored media.

This request for production is not intended to invade the attorney-client relationship. Accordingly, the request for production does not seek the production of privileged letters or correspondence between you and your attorney. To the extent that you believe any of the following requests to produce are objectionable, produce so much of each request and each part thereof as is not, in your view objectionable, and separately state so much of that part of each request to produce as to which you raise an objection and each ground for each such objection.

For any document over which a claim of privilege is made, please provide a complete privilege log with enough information so that the subject of the privilege can be properly assessed, including but not limited to the date of the document, the number of pages of the document, a description of the document, the specific privileged claim.

<<FIELDADJUSTER\_NAME>> shall produce the following documents at the time of the deposition:

**DOCUMENTS TO BE PRODUCED**

1. A copy of your driver's license and/or other photo identification.

2. A copy of your curriculum vitae.

3. A copy of all professional licenses held by you which were in effect on the Date of Loss herein.

4. A copy of all professional licenses currently held by you.

5. A color copy of all photographs taken or received by you relating to the Claim.

6. A copy of any estimate, written report, handwritten notes, sketches, diagrams, correspondence, or any other document prepared by you, on your behalf, or at your direction, relating to the Claim.

7. A copy of your file relating to the Claim.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on ­­­­­­­­­­­­­February 19, 2022, a true and correct copy of the foregoing was filed and served on the Defendant through the Florida E-File Portal.

**The Florida Insurance Law Group, LLC**

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262



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Fla. Bar No. 68865

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