<<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 the Defendant’s, **CORPORATE REPRESENTATIVE**, 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 Corporate Representative to be designated by Defendant, <<INSURANCECOMPANY\_SUITNAME>>, shall:

**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 <<INSURANCECOMPANY\_SUITNAME>> and the results thereof.**

**2. Have knowledge and be able to explain all facts upon which <<INSURANCECOMPANY\_SUITNAME>> 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 <<INSURANCECOMPANY\_SUITNAME>> 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 <<INSURANCECOMPANY\_SUITNAME>> 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 the contents of all documents and facts upon which <<INSURANCECOMPANY\_SUITNAME>> relies upon to form the basis for any affirmative defense being asserted by <<INSURANCECOMPANY\_SUITNAME>> in this case.**

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

**7. Have knowledge and be able to identify and provide biographical information about all employees, agents, sub-contractors, independent contractors, companies or persons retained or hired by Defendant to perform any portion of the inspection or adjustment of the claim on behalf of the Defendant and their qualifications for same.**

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.

<<INSURANCECOMPANY\_SUITNAME>> shall produce the following documents at the time of the deposition:

**INSTRUCTIONS**

The terms “you”, “your” or “Defendant” mean <<INSURANCECOMPANY\_SUITNAME>>, 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>>, 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.

**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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