<<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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PLAINTIFF’S PRE-TRIAL CATALOG

Plaintiff, <<PROVIDER\_SUITNAME>>, by an through undersigned counsel, pursuant to the Florida Rules of Civil Procedure, Rule 1.200, files this Pretrial Catalog and states the following:

WITNESS LIST

Plaintiff currently anticipates calling the following witnesses:

1. <<PROVIDER\_SUITNAME>>’s corporate representative and records custodian Mathew Moore, 941 W Morse Blvd, Suite 100, Winter Park, FL 32789. Witness will testify as the corporate representative and records custodian on behalf of the Plaintiff. Testimony may include facts surrounding the claims and the services performed by the Plaintiff in this matter.
2. Expert, indoor environmental professional, Peter D. Burnett, 941 W Morse Blvd, Suite 100, Winter Park, FL 32789. Expert will testify as to insutry standards regarding indoor environmental assessments in relation to services provided by the Plaintiff.
3. Expert, professional engineer, Grant W. Renne, P.E., 112 Anchor Drive, Ponce Inlet, FL 32127. Expert will testify as to insutry standards regarding engineering assessment and reports in relation to services provided by the Plaintiff. Expert will also provide expert opinion as to cause and origin of loss and damages relating to the loss.
4. Expert, professional engineer, \_\_\_\_\_\_\_\_\_\_\_\_\_\_, 941 W Morse Blvd, Suite 100, Winter Park, FL 32789. Expert will testify as to insutry standards regarding engineering assessment and reports in relation to services provided by the Plaintiff. Expert will also provide expert opinion as to cause and origin of loss and damages relating to the loss.
5. Insurance Expert, Thomas Paine, CIC, P. O. Box 1886, New Port Richey, FL 34656. Expert will testify as to insutry standards regarding insurance policies, interpretation of the policies, and custom and usage of terms of art in the insurance industry.
6. <<INJUREDPARTY\_NAME>>, the insured, <<INJUREDPARTY\_FULL\_ADDRESS>>. We anticipate that the witness will testify regarding the loss, dmages and the claim.
7. The field adjuster, the desk adjuster and/or other agents/employees of <<INSURANCECOMPANY\_SUITNAME>> who have participated in the handling, adjusting, and/or investigation of the subject claim. We anticipate that the witnesses will testify to their involvement in the adjustment of the subject claim.
8. <<INSURANCECOMPANY\_SUITNAME>>’s records custodian relating to the subject claim file. We anticipate that the witness will testify to the Defendant’s business records.
9. Any and all expert witnesses listed by, or intended to be used by, <<INSURANCECOMPANY\_SUITNAME>> at trial.
10. Any and all individuals and or entities identified by <<INSURANCECOMPANY\_SUITNAME>> in their discovery;
11. Any and all necessary rebuttal witnesses;
12. Any and all witnesses listed by <<INSURANCECOMPANY\_SUITNAME>> in their witness list.
13. Plaintiff reserves the right to supplement this witness list.

ITEMIZED LIST OF DAMAGES CLAIMED

The following damages are being claimed in this action:

1. <<CLAIM\_AMOUNT>>.

**EXHIBIT LIST**

PLAINTIFF’S EXHIBITS. The plaintiff seeks to admit the following exhibits into evidence:

1. Copy of the Assignment of Benefits (AOB);

2. Copy of the policy from <<INSURANCECOMPANY\_SUITNAME>>;

3. Declaration Page of the subject policy;

4. Reports prepared in connection with any work performed;

5. Invoices;

6. Pictures;

7. Protocol Reports;

8. All relevant and related written and or electronic correspondence between Plaintiff and Defendant;

9. Sketches;

10. Lab chain of custody;

11. Complaint;

12. Answer & Affirmative Defenses;

13. Pleadings and Responses to all discovery;

14. Curriculum Vitae of any and all listed experts;

15. Admissible portions of Defendant’s claim file and related materials;

16. Deposition transcripts;

17. Documents revealed in discovery;

1. Any and all exhibits listed by Defendant;

Plaintiff reserves the right to supplement this exhibit list.

**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 Florida Courts E-Filing Portal.

**Florida Insurance Law Group, LLC**

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