<<COURT\_NAME>>

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

PLAINTIFF’S PRE-TRIAL CATALOG

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

WITNESS LIST

Plaintiff currently anticipates calling the following witnesses:

1. <<INJUREDPARTY\_NAME>>, the insured, <<INJUREDPARTY\_FULL\_ADDRESS>>.
2. Expert, professional engineer, Grant W. Renne, P.E., 112 Anchor Drive, Ponce Inlet, FL 32127.
3. 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;
4. <<INSURANCECOMPANY\_SUITNAME>>’s records custodian relating to the subject claim file;
5. Any and all expert witnesses listed by, or intended to be used by, <<INSURANCECOMPANY\_SUITNAME>> at trial.
6. Any and all individuals and or entities identified by <<INSURANCECOMPANY\_SUITNAME>> in their discovery;
7. Any and all necessary rebuttal witnesses;
8. Any and all witnesses listed by <<INSURANCECOMPANY\_SUITNAME>> in their witness list.
9. 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 policy from <<INSURANCECOMPANY\_SUITNAME>>;
2. Declaration Page of the subject policy;
3. Reports prepared in connection with any work performed;
4. Estimates/Invoices;
5. Pictures;
6. Permits;
7. All relevant and related written and or electronic correspondence between Plaintiff and Defendant;
8. Sketches;
9. Engineering reports.
10. Expert reports.
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;
18. 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**

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262



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