<<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, files it’s Pretrial Catalog pursuant to the Florida Rules of Civil Procedure, Rule 1.200, and states the following:

WITNESS LIST

Plaintiff currently anticipates calling to following witnesses:

1. <<PROVIDER\_SUITNAME>>’s corporate representative and records custodian Franky Despino, <<PROVIDER\_LOCAL\_ADDRESS>>.
2. Expert, professional engineer, Grant W. Renne, P.E., <<PROVIDER\_LOCAL\_ADDRESS>>
3. <<INJUREDPARTY\_NAME>>, the insured, <<INJUREDPARTY\_FULL\_ADDRESS>>;
4. 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;
5. <<INSURANCECOMPANY\_SUITNAME>>’s records custodian relating to the subject claim file;
6. Any and all expert witnesses listed by, or intended to be used by, <<INSURANCECOMPANY\_SUITNAME>> at trial.
7. Any and all individuals and or entities identified by <<INSURANCECOMPANY\_SUITNAME>> in their discovery;
8. Any and all necessary rebuttal witnesses;
9. Any and all witnesses listed by <<INSURANCECOMPANY\_SUITNAME>> in their witness list.
10. Plaintiff reserves the right to supplement this witness list.

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. Estimates/Invoices;
6. Pictures;
7. Permits;
8. All relevant and related written and or electronic correspondence between Plaintiff and Defendant;
9. Sketches;
10. Engineering reports.
11. Expert reports.
12. Complaint;
13. Answer & Affirmative Defenses;
14. Pleadings and Responses to all discovery;
15. Curriculum Vitae of any and all listed experts;
16. Admissible portions of Defendant’s claim file and related materials;
17. Deposition transcripts;
18. Documents revealed in discovery;
19. Any and all exhibits listed by Defendant;

Plaintiff reserves the right to supplement this exhibit list.

ITEMIZED LIST OF DAMAGES CLAIMED

The following damages are being claimed in this action:

1. <<CLAIM\_AMOUNT>>.

**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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Tel. (305) 906-4262



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