<<COURT\_NAME>>

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

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

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 Erik Santovenia, <<PROVIDER\_LOCAL\_ADDRESS>>.
2. Expert, indoor environmental professional, Erik Santovenia, <<PROVIDER\_LOCAL\_ADDRESS>>.
3. Expert, professional engineer, Grant W. Renne, P.E., 112 Anchor Drive, Ponce Inlet, FL 32127.
4. <<INJUREDPARTY\_NAME>>, the insured, <<INJUREDPARTY\_FULL\_ADDRESS>>;
5. 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;
6. <<INSURANCECOMPANY\_SUITNAME>>’s records custodian relating to the subject claim file;
7. Any and all expert witnesses listed by, or intended to be used by, <<INSURANCECOMPANY\_SUITNAME>> at trial.
8. Any and all individuals and or entities identified by <<INSURANCECOMPANY\_SUITNAME>> in their discovery;
9. Any and all necessary rebuttal witnesses;
10. Any and all witnesses listed by <<INSURANCECOMPANY\_SUITNAME>> in their witness list.
11. 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**

8724 Sunset Drive, #260

Miami, FL 33173

Tel. (305) 906-4262

Text, letter

Description automatically generated

Leo Manon, Esq.

Fla. Bar No. 115757

[Pleadings@flinslaw.com](mailto:Pleadings@flinslaw.com)