<<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, Albert Valero, 6619 S. Dixie Hwy. #197, Miami, FL 33143.
2. <<PROVIDER\_SUITNAME>>’s, corporate representative and records custodian, Mathew Moore, <<PROVIDER\_LOCAL\_ADDRESS>>.
3. Expert, indoor environmental professional, Peter D. Burnett, <<PROVIDER\_LOCAL\_ADDRESS>>.
4. Expert, professional engineer, Grant W. Renne, P.E., 112 Anchor Drive, Ponce Inlet, FL 32127.
5. <<INJUREDPARTY\_NAME>>, the insured, <<INJUREDPARTY\_FULL\_ADDRESS>>;
6. 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;
7. <<INSURANCECOMPANY\_SUITNAME>>’s records custodian relating to the subject claim file;
8. Any and all expert witnesses listed by, or intended to be used by, <<INSURANCECOMPANY\_SUITNAME>> at trial.
9. Any and all individuals and or entities identified by <<INSURANCECOMPANY\_SUITNAME>> in their discovery;
10. Any and all necessary rebuttal witnesses;
11. Any and all witnesses listed by <<INSURANCECOMPANY\_SUITNAME>> in their witness list.
12. 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) from AQA to <<PROVIDER\_SUITNAME>>;
2. Copy of the Assignment of Benefits (AOB) from <<INJUREDPARTY\_NAME>> to AQA.
3. Copy of the policy from <<INSURANCECOMPANY\_SUITNAME>>;
4. Declaration Page of the subject policy;
5. Reports prepared in connection with any work performed;
6. Invoices;
7. Pictures;
8. Protocol Reports;
9. All relevant and related written and or electronic correspondence between Plaintiff and Defendant;
10. Sketches;
11. Lab chain of custody;
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.

**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.

**The Florida Insurance Law Group, LLC**

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Tel. (305) 906-4262



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