<<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 and 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. TCR corporate representative and records custodian, David Dubis, 7790 NW 55th St, Doral, FL 33166.
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) from TCR to <<PROVIDER\_SUITNAME>>;
2. Copy of the Assignment of Benefits (AOB) from <<INJUREDPARTY\_NAME>> to TCR;
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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