<<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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**CERTIFICATE OF SERVING FIRST REQUEST FOR PRODUCTION TO**

**DEFENDANT <<INSURANCECOMPANY\_SUITNAME>>**

I HEREBY CERTIFY that Plaintiff’s First Request for Production has been propounded to Defendant, <<INSURANCECOMPANY\_SUITNAME>>, simultaneously with the service of the process and Statement of Claim on said Defendant.

**The Florida Insurance Law Group, LLC**

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262



Robert F. Gonzalez, Esq.

Fla. Bar No. 68865

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

<<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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**FIRST REQUEST FOR PRODUCTION TO**

**DEFENDANT <<INSURANCECOMPANY\_SUITNAME>>**

Plaintiff, <<PROVIDER\_SUITNAME>>, requests Defendant, <<INSURANCECOMPANY\_SUITNAME>>, to produce the following documents at the offices of the undersigned counsel pursuant to Florida Rule of Civil Procedure 1.350 within forty-five (45) days after service.

The terms “you” and “your” mean <<INSURANCECOMPANY\_SUITNAME>>, or any person, entity or corporation except your own attorney, that is or was acting on behalf of or under the direction of or at the instruction of <<INSURANCECOMPANY\_SUITNAME>>, during the relevant time.

The term “insurance claim” means a claimed loss bearing claim number <<INS\_CLAIM\_NUMBER>> by the Insured, <<INJUREDPARTY\_NAME>> with Defendant for the property located at <<INJUREDPARTY\_FULL\_ADDRESS>>.

If not already defined by the request for production, the relevant time for the purposes of these document requests shall be the first effective date of the subject policy of insurance with Defendant for the property located at <<INJUREDPARTY\_FULL\_ADDRESS>> as owned by the Insured, <<INJUREDPARTY\_NAME>>, to the present.

The term “document” shall include writings, notes, drafts, outlines, recordings and files, regardless of storage media; they include, but are not limited to, writings contained on paper, recordable tape, celluloid, disks, hard drives, electronic mail servers or any other digitally stored media.

This request for production is not intended to invade the attorney-client relationship. Accordingly, the request for production does not seek the production of privileged letters or correspondence between you and your attorney. To the extent that you believe any of the following requests to produce are objectionable, produce so much of each request and each part thereof as is not, in your view objectionable, and separately state so much of that part of each request to produce as to which you raise an objection and each ground for each such objection.

For any document over which a claim of privilege is made, please provide a complete privilege log with enough information so that the subject of the privilege can be properly assessed, including but not limited to the date of the document, the number of pages of the document, a description of the document, the specific privileged claim.

**REQUEST FOR PRODUCTION**

1. The original and/or a true and correct certified copy of the insurance policy described in the Complaint or Statement of Claim, including declaration page, endorsements, and all addendums, if any.
2. Any and all copies of all checks issued by Defendant and payable to or on behalf of Plaintiff representing payment for damages and costs relating to Claim Number <<INS\_CLAIM\_NUMBER>>.
3. Any and all copies of all checks issued by Defendant and payable to or on behalf of Insured <<INJUREDPARTY\_NAME>> representing payment for damages and costs relating to Claim Number <<INS\_CLAIM\_NUMBER>>.
4. Any and all copies of all correspondence sent by Defendant to Plaintiff relating to Claim Number <<INS\_CLAIM\_NUMBER>>.
5. Any and all copies of all correspondence sent by Defendant to <<INJUREDPARTY\_NAME>> relating to Claim Number <<INS\_CLAIM\_NUMBER>>.
6. Any and all copies of coverage determination correspondences relating to the subject claim.
7. Any and all copies of Defendant’s response to Plaintiff’s 10-day demand letter.
8. Any and all copies of proof of mailing (or emailing) of said documents in response to request for production numbers 2, 3, 4, 5, 6 and 7.