<<COURT\_NAME>>

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

CERTIFICATE OF SERVING 2ND REQUEST FOR PRODUCTION

TO DEFENDANT, <<INSURANCECOMPANY\_SUITNAME>>

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



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>> |

SECOND 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 thirty (30) 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 Plaintiff 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**

All documents that pertain either directly or indirectly to any fact, allegation, defense, incident, event, or transaction that is the subject matter of this litigation. As to such documents not in your possession, identify same and state the name, address and telephone number of all persons who have possession of same.

All documents that you have identified in any of your answers to Interrogatories. As to such documents not in your possession, identify same, state the name, address, and telephone number of all persons who have possession of same.

1. Any and all correspondence between the <<INJUREDPARTY\_NAME>> and the Defendant, including agents or individuals retained by Defendant, regarding the insurance claim described in the Complaint.
2. Any and all correspondence between the <<PROVIDER\_SUITNAME>> and the Defendant, including agents or individuals retained by Defendant, regarding the insurance claim described in the Complaint.
3. Any and all correspondence between the Insured, <<INJUREDPARTY\_NAME>>, and the Defendant, including agents or individuals retained by Defendant, regarding the insurance claim described in the Complaint.
4. Any and all written estimates, and invoices for assessments made in relation to the insurance claim described in the Complaint that were submitted by Plaintiff to Defendant.
5. Any and all written estimates for repairs, engineering reports, inspection reports, expert evaluations, prepared by Defendant or any of its agents or individuals retained by the Defendant for the insurance claim described in the Complaint.
6. Any and all expert reports, including but not limited to diagrams, photographs, notes, memoranda, field notes, samples, contracts, video tapes, correspondence (including electronic correspondence), calculations, rough drafts, partial drafts, and laboratory reports related in any way to the facts of the insurance claim or this case.
7. Any and all delivery receipts, written proof of mailing and all other records evidencing in any manner the dates the insurance policy or its various endorsements as described in the Complaint were mailed to Insured, <<INJUREDPARTY\_NAME>>.
8. Any and all written communications between Defendant and any third party concerning the processing, acceptance, and denial of any portion of the insurance claim described in the Complaint.
9. Any and all materials, papers, documents, photographs or tangible things of any type relied upon by Defendant, other than the insurance policy, as a basis for denial of the insurance claim described in the Complaint.
10. Any and all damage investigation summaries or loss reports relating to or regarding the subject insurance claim described in the Complaint.
11. Any and all recorded statements and/or transcripts taken by the Defendant or its agents, including but not limited to statements given by the Insured, <<INJUREDPARTY\_NAME>>, agents of the Insured, witnesses, inspectors, adjusters or experts..
12. Any and all appraisals of loss or value of loss prepared by, for, or on behalf of the Defendant regarding the insurance claim described in the Complaint.
13. Any and all investigative reports concerning the insurance claim described in the Complaint, and all written communications between the Defendant and any third party concerning said reports.
14. Any and all documents relating to or supporting Defendant’s denial of any allegations of the Complaint, and relating to or supporting each affirmative or general defense asserted by Defendant
15. All photographs of the subject property for the insurance claim described in the Complaint and located at <<INJUREDPARTY\_FULL\_ADDRESS>>. As to such documents not in your possession, identify same, state the name, address, and telephone number of all persons who have possession of same.