<<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 EXPERT INTERROGATORIES TO** **DEFENDANT**

I HEREBY CERTIFY that on February 19, 2022 a true and correct copy of the foregoing was served upon the Defendant via the Florida E-file Portal.

The Florida Insurance Law Group, LLC

8724 Sunset Drive, #260, Miami, FL 33173

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Description automatically generated

Leo Manon III, Esq.

Fla. Bar No. 115757

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<<COURT\_NAME>>

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

**EXPERT INTERROGATORIES TO DEFENDANT**

Plaintiff, <<PROVIDER\_SUITNAME>>, propounds the following Interrogatories to Defendant, <<INSURANCECOMPANY\_SUITNAME>>, and requests written answers, under oath, pursuant to Rule 1.340 of the Florida Rules of Civil Procedure within thirty (30) days from the date of the service.

The terms “you”, “your” or “Defendant” 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 “dispute” means any of the factual allegations, causes of action or claims for relief that are asserted in the Complaint or any Counterclaim or Crossclaim in this matter.

The term “engineer report” means any document in which an opinion as to cause, origin or description of damage is given by an engineer as it relates to physical damage found at a property that has led to an insurance claim regarding same.

The term “estimate of damage” means any document in which contains an opinion as to the amount of money it would take to restore a damaged property to its pre-loss condition.

If not already defined by the interrogatory, the relevant time for the purposes of these interrogatories shall be the date of loss to the present.

These interrogatories are not intended to invade the attorney-client relationship. Accordingly, these interrogatories do not seek the disclosure of privileged communications between you and your attorney. To the extent that you believe any of the following Interrogatories to be objectionable, answer so much of each Interrogatory and each part thereof as is not, in your view objectionable, and separately state so much of that part of each Interrogatory as to which you raise an objection and each ground for each such objection.

INTERROGATORIES

1. Please state the names, addresses, and telephone number of each expert whom you or your attorneys expect to call at trial or whose opinion will be relied upon on a Motion for Summary Judgment.

2. With regard to each expert please state:

a) The expert witness' profession, occupation or specialty and the field in which he is allegedly an expert.

b) The educational background, giving the name and address of each school and/or institution he/she attended and a description of each degree earned with dates thereof.

c) The name of any professional or trade association, or societies of which he is related or is a member, stating the status of each and the inclusive dates of such status.

d) The title, name of publications, name of publisher, subject matter, dates of publication of any books, papers, or articles, etc. authored by each such person authored by such person.

e) The specific opinions and subject matters the expert is expected to testify as to at the time of trial or to be utilized in a Motion for Summary Judgment.

f) The substance of the facts that support each opinion that the expert will testify is based upon.

g) Whether those opinions are final.

3. With regard to the facts used to support the expert’s opinions please state:

a) The name and address of the person supplying such facts.

b) The form in which such facts were supplied to him.

4. If any person named in answer to this interrogatory has submitted a written report or opinion related to the subject matter of this case, state:

a) The name of the person submitting such written report or opinion.

b) The name or other means of identification of the person to whom this report was submitted.

c) The date of such written report or opinion.

d) The name and address of the person to whom such written report or opinion was submitted.

e) The name and address of the person who has present custody of this report.

f) Please supply a copy of the report to the undersigned attorneys, by mail, at the time of the answer to interrogatories are required to be filed and served under the applicable Florida Rules of Civil Procedure.

5. Please state whether any portion of the claim in this case, an item, record or object relevant to this lawsuit has been reviewed, tested, analyzed, physically examined, or inspected by any expert.

a) If so, by whom and when?

b) If so, describe in detail sufficient to identify each person, item or object that was tested, analyzed, examined, or inspected and the name of the expert?

c) The facts or information you were seeking in having these tests, examinations, or inspections made.

d) Please state the findings resulting from each inspection, analysis, examination, or test conducted.

6. Please state the amount of compensation paid to each expert as of the date of the answers to these Interrogatories are prepared for this case, the hourly rate charged by each expert for an examinations of any kind, reviewing records, appearing at deposition, and at trial.

7. Please identify the amount of money each expert has been paid by this Defendant within the preceding three (3) years as an expert for performing site inspections, creating engineer reports and/or estimates of damage, peer reviews, depositions, or trials. (This question is not limited to any one vendor. Please provide the information relating to any and all vendors used by the Defendant or if the Defendant paid the expert directly for any service).

8. Please identify all other cases, within the last three (3) years in which each of the experts have testified by deposition or at trial. Please include the case name, case style, the name of the Judge, the name and address of the Plaintiff’s attorney, the name and address of the Defendant’s attorney, whether the expert testified for the Plaintiff or the Defendant, whether the testimony was transcribed, the current location of copies of the transcription, and the name, address and telephone number of the court reporter(s).

9. For each listed expert, please approximate the portion of the expert’s involvement as an expert witness for performing site inspections, creating engineer reports and/or estimates of damage, Peer Reviews, depositions, meetings with attorneys, and trial testimony. This approximation may be based on the number of hours, percentage of hours, or percentage of earned income derived from serving as an expert witness.

10. For the preceding three (3) years, how many how many property inspections, estimates of damage and/or engineer reports did the expert create on behalf of an insurance company? If the exact number is not available please provide an approximation.

11. For the preceding three (3) years, how many peer reviews did the Defendant’s expert witness perform? If the exact number is not available please provide an approximation.

12. For the preceding three (3) years, how many times has each expert performed analysis and rendered opinions for the Defendant insurance company and how much was the expert paid for each service?

13. When the expert performs a property inspection and creates an engineer report and/or estimate of damage, what percentage of the time does the expert state that the type of loss and damage found is consistent with the reported loss by the insured making the insurance claim?

14. Approximately how much each expert been paid in each of the preceding three years for performing property inspections, creating an engineer reports and/or estimates of damage. (This question seeks information relating to the total amount of money paid to the expert regardless of the insurance Company or vendor).

15. If the Defendant used an outside vendor to hire its expert in this case please state the name of the vendor or vendors and the amount of money the Defendant, the Defendant’s parent company, or any of the Defendant’s subsidiaries paid said vendor or vendors for the last 3 years?

END OF INTERROGATORIES

THE UNDERSIGNED HEREBY CERTIFIES THAT THE FOREGOING ANSWERS TO INTERROGATORIES ARE TRUE AND CORRECT. I AM ALSO AWARE THAT ANY MATERIALLY FALSE STATEMENT KNOWINGLY MADE WITH THE INTENT TO DEFRAUD OR MISLEAD SHALL SUBJECT ME TO THE PENALTY OF PERJURY AND MAY BE CONSIDERED A FRAUD UPON THE COURT.

DATED: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name: \_\_\_\_\_\_\_\_\_\_\_\_\_

**Notary Certification**

BEFORE ME, the undersigned authority, this day personally appeared \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ having been duly sworn, deposes and says that he/she executed to the best of his/her knowledge the foregoing Answers to Interrogatories and that such Answers are true and correct.

Sworn to and subscribed before me on this date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public

My Commission expires: