<<COURT\_NAME>>

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

**PLAINTIFF’S MOTION TO COMPEL**

**BETTER RESPONSES TO DISCOVERY OVER OBJECTION**

Plaintiff, <<PROVIDER\_SUITNAME>>, by and through the undersigned counsel, hereby files this Motion to Compel Discovery as to Defendant, <<INSURANCECOMPANY\_SUITNAME>>, and in support thereof further states:

1. Discovery consisting of interrogatories, request for production and/or request for admissions were propounded upon Defendant, <<INSURANCECOMPANY\_SUITNAME>>, on \_\_\_\_.

2. That on \_\_\_\_\_\_\_\_\_\_\_\_\_\_, Defendant, filed a response to the foregoing discovery.

3. The response to the foregoing discovery is non-responsive, incomplete, unduly vague or asserts objections that are not relevant for the following items:

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4. In addition to the above referenced objections, Defendant has also failed to provide the Plaintiff verified responses to interrogatories as required per the Florida Rules of Civil Procedure.

5. Plaintiff is entitled to full, complete and verified complete responses to the foregoing discovery requests as the same are relevant and material to the issues of this case and are not privileged.

WHEREFORE, Plaintiff, <<PROVIDER\_SUITNAME>>, requests the Court to enter an Order to compel Defendant, <<INSURANCECOMPANY\_SUITNAME>>, to file better responses to the discovery, overrule the Defendant’s objections referenced herein, file verified response to interrogatories and grant such other further relief that is just and appropriate under the circumstances.

**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.

**Florida Insurance Law Group, LLC**

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