<<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 DISCOVERY**

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. Plaintiff propounded discovery on Defendant. Based on the applicable Florida Rules of Civil Procedure the allowable time to respond to Plaintiff’s discovery requests has elapsed.

2. Defendant, <<INSURANCECOMPANY\_SUITNAME>>, has the ability to comply with the foregoing discovery and there are no outstanding extensions, continuances, or objections pertinent to the discovery.

3. The failure of Defendant, <<INSURANCECOMPANY\_SUITNAME>>, to file timely responses to the discovery is prejudicial to the Plaintiff and the ability to prosecute this case.

4. Plaintiff has otherwise complied with Fla. R. Civ. P. 1.380(a)(2), certifying that Plaintiff has conferred, or attempted to confer, with the person or party failing to make the discovery in an effort to secure the information or material without court action.

5. Plaintiff has served this Motion on Defendant at least seven (7) days prior to the submission of a proposed order to compel to the Court.

WHEREFORE, Plaintiff, <<PROVIDER\_SUITNAME>>, requests the Court to enter an Order to compel Defendant, <<INSURANCECOMPANY\_SUITNAME>>, to file a response to the discovery referenced herein, 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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