<<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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**PLAINTIFF’S MOTION TO DEEM ADMISSIONS ADMITTED**

Plaintiff, <<PROVIDER\_SUITNAME>>, by and through the undersigned counsel, hereby moves this Court for an Order deeming certain admission requests propounded to Defendant, <<INSURANCECOMPANY\_SUITNAME>>, be admitted, and in support thereof further states:

1. Plaintiff, <<PROVIDER\_SUITNAME>>, properly propounded a Request for Admissions to Defendant, <<INSURANCECOMPANY\_SUITNAME>>.

2. Defendant, <<INSURANCECOMPANY\_SUITNAME>> responses to the aforementioned discovery was due on, or before, \_\_\_.

3. To date, Defendant, <<INSURANCECOMPANY\_SUITNAME>>, has not filed responses or objections to discovery or requested any additional time to respond to Plaintiff’s Request for Admissions.

4. Florida Rule of Civil Procedure 1.370(a) (2012) states in pertinent part:

“[T]he matter is admitted unless the party to whom the request is directed serves upon the party requesting the admission a written answer or objection addressed to the matter within 30 days after service of the request….”

5. Pursuant to Florida Rule of Civil Procedure 1.370(b), any matter admitted under this rule is conclusively established unless the court on motion permits withdrawal or amendment of the admission.

6. Defendant, <<INSURANCECOMPANY\_SUITNAME>>, has failed to file a proper response to the foregoing Request for Admissions, and the same should be deemed admitted by the Court.

WHEREFORE, Plaintiff, <<PROVIDER\_SUITNAME>>, requests the Court to enter an Order to deem all the admissions contained in the Request for Admissions as admitted, 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 the Florida E-File Portal.

**The Florida Insurance Law Group, LLC**

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