<<COURT\_NAME>>

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

**NOTICE OF FILING RESPONSE TO INTERROGATORIES**

I HEREBY CERTIFY that on February 19, 2022, a true and correct copy of the foregoing was filed and served through the Florida E-File Portal to <<OPPOSING\_COUNSEL\_NAME>>.

**Florida Insurance Law Group, LLC**

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262



Robert F. Gonzalez, Esq.

Fla. Bar No. 68865

<<COURT\_NAME>>

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

**ANSWERS TO INTERROGATORIES BY**

**PLAINTIFF, <<PROVIDER\_SUITNAME>>**

Plaintiff, <<PROVIDER\_SUITNAME>>, has at this stage of the litigation responded to the Interrogatories on the basis of the best data available. As additional data may be acquired during the course of this case, Plaintiff reserves the right at any time to revise, correct, modify supplement or clarify any of the answers provided herein.

A. Plaintiff objects to the Interrogatories in their entirety on the grounds that the interrogatories pursuant to the Definitions and Instructions call for information that may be protected by the attorney-client and work product privileges.

B. Plaintiff objects to the Interrogatories in their entirety because the Interrogatories pursuant to the Definitions and Instructions request information that is not within the personal knowledge of the Plaintiff.

C. Plaintiff objects to the Interrogatories in their entirety because the Interrogatories pursuant to the Definitions and Instructions request information concerning documents that are in the care or control of Defendant, <<INSURANCECOMPANY\_SUITNAME>>, and not the Plaintiff.

Subject to the above and without waiving the foregoing objections, the following answers are provided:

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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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

<<PROVIDER\_SUITNAME>>

Plaintiff

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Printed Name

SWORN TO AND SUBSCRIBED before me on this date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

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

Signature

Notary Public

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

Print, Type or Stamp

Commissioned Name of Notary

Personally Known \_\_\_\_\_\_\_\_ OR Produced Identification \_\_\_\_\_\_\_\_\_\_

Type of Identification Produced \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_