<<COURT\_NAME>>

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

**RESPONSE TO REQUEST FOR PRODUCTION**

Plaintiff, <<PROVIDER\_SUITNAME>>, hereby files this Response to the Request for Production filed by Defendant, <<INSURANCECOMPANY\_SUITNAME>>, as follows:

GENERAL OBJECTIONS

Plaintiff objects generally to the definitions and/or instructions contained in the Request for Production to the extent they:

(1) Purport to impose any obligations greater than those provided by the applicable law and rules governing the proper scope and extent of discovery.

(2) Seek documents protected from discovery by the attorney-client privilege, the attorney work

product doctrine, and/or other privileges recognized by law.

(3) Seek documents that are not in the possession of the Plaintiff.

Subject to and without waiving any objection stated herein, Plaintiff responds as follows:

SPECIFIC RESPONSES

In lieu of the Request for Production, Plaintiff hereby [!plaintiff#!states/state] that true and correct copies of those documents pertaining to the numbered paragraphs contained in the Request for Production were electronically sent to the attorney for Defendant, <<INSURANCECOMPANY\_SUITNAME>>.

PLEASE TAKE NOTICE that the inadvertent production or disclosure of any material that may be privileged or subject to work product protection shall not constitute a waiver of any applicable privilege. Nor shall such production or disclosure be deemed a waiver of the right to interpose any applicable objections at any time, including but not limited to objections such as competency, relevancy or materiality.

The following paragraphs correspond directly to the numbered paragraphs contained in the Request for Production:

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 20, 2022, a true and correct copy of the foregoing was filed and served through the Florida E-File Portal.

**Florida Insurance Law Group, LLC**

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Robert F. Gonzalez, Esq.

Fla. Bar No. 68865