<<COURT\_NAME>>

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

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

**CERTIFICATE OF SERVING THIRD SET OF INTERROGATORIES**

**TO DEFENDANT**

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

**Florida Insurance Law Group, LLC**

8724 Sunset Drive, #260, Miami, FL 33173

Tel. (305) 906-4262

Logo, company name

Description automatically generated

Leo Manon III, Esq.

Fla. Bar No. 115757

[Pleadings@flinslaw.com](mailto:Pleadings@flinslaw.com)

<<COURT\_NAME>>

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

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/

**THIRD SET OF INTERROGATORIES**

**TO DEFENDANT**

<<PROVIDER\_SUITNAME>>,  a/a/o  <<INJUREDPARTY\_NAME>> by and through the undersigned counsel, hereby files the following Interrogatories to Defendant, <<INSURANCECOMPANY\_SUITNAME>>, and requests written answers, under oath, pursuant to Rule 1.340 of the Florida Rules of Civil Procedure within thirty (30) days from the date of service.

The terms “you” and “your” mean <<INSURANCECOMPANY\_SUITNAME>>, or any person, entity or corporation except your own attorney, that is or was acting on behalf of or under the direction of or at the instruction of <<INSURANCECOMPANY\_SUITNAME>>, during the relevant time.

The term “insurance claim” means a claimed loss on <<ACCIDENT\_DATE>> by the <<PROVIDER\_SUITNAME>>,  a/a/o  <<INJUREDPARTY\_NAME>> under Policy Number <<POLICY\_NUMBER>> with Defendant for the property located at <<INSUREDPARTY\_ADDRESS>>.

If not already defined by the interrogatory, the relevant time for the purposes of these interrogatories shall be the first effective date of Policy Number <<POLICY\_NUMBER>> with Defendant for the property located at <<INSUREDPARTY\_ADDRESS>> as owned by the <<INJUREDPARTY\_NAME>> to the present.

These interrogatories are not intended to invade the attorney-client relationship. Accordingly, these interrogatories do not seek the disclosure of privileged communications between you and your attorney. To the extent that you believe any of the following Interrogatories to be objectionable, answer so much of each Interrogatory and each part thereof as is not, in your view objectionable, and separately state so much of that part of each Interrogatory as to which you raise an objection and each ground for each such objection.

INTERROGATORIES

1. Describe the factual basis for your denial of each Admission you denied or denied as phrased in Defendant’s Response to Plaintiff’s Request for Admissions. *A copy of Defendant’s Response to Plaintiff’s Request for Admissions is attached hereto as Exhibit A.*

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

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

Printed Name: \_\_\_\_\_\_\_\_\_\_\_\_\_

**Notary Certification**

BEFORE ME, the undersigned authority, this day personally appeared \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ who having been duly sworn, deposes and says that he/she executed to the best of his/her knowledge the foregoing Answers to Interrogatories in Aid of Execution and that such Answers are true and correct.

Sworn to and subscribed before me on this date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

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

Notary Public

My Commission expires: