

DEFENDANT'S REQUEST FOR ADMISSIONS

Plaintiff is requested to admit or deny the following allegations pursuant to the appropriate Florida Rule of Civil Procedures:

1. Plaintiff(s) received benefits from a collateral source, as defined by Florida Statute 768.76, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
2. Plaintiff(s) is/are entitled to received benefits from a collateral source, as defined by Florida Statute 768.76, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
3. Plaintiff(s) received benefits from a collateral source, as defined by Florida Statute 768.76, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.
4. Plaintiff(s) is/are entitled to receive benefits from a collateral source, as defined by Florida Statute 768.76, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.
5. Plaintiff(s) received benefits under the Personal Injury Protection portion of an automobile policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
6. Plaintiff(s) is/are entitled to receive benefits under the Personal Injury Protection portion of an automobile policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.
7. Plaintiff(s) received benefits under the Personal Injury Protection portion of an automobile insurance policy for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

8. Plaintiff(s) is/are entitled to receive benefits under the Personal Injury Protection portion of an automobile insurance policy for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

9. Plaintiff(s) received benefits under the medical payments provisions of an automobile insurance policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

10. Plaintiff(s) is/are entitled to receive benefits under the medical payments provisions of an automobile insurance policy for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

11. Plaintiff(s) is/are subject to a deductible under the Personal Injury Protection portion of an automobile insurance policy.

12. Plaintiff(s) received benefits pursuant to personal or group health insurance policy, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

13. Plaintiff(s) is/are entitled to receive benefits pursuant to personal or group health insurance policy, for medical bills alleged to have been incurred as a result of the incident described in the Complaint.

14. Plaintiff(s) received benefits pursuant to a personal or group wage continuation plan or policy, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

15. Plaintiff(s) is/are entitled to receive benefits pursuant to a personal or group wage continuation plan or policy, for loss of wages or income alleged to have been sustained as a result of the incident described in the Complaint.

16. Plaintiff(s), at the time and place of the accident that is the subject of this lawsuit, had available a functional and operation seat belt/shoulder harness restraint system.
17. Plaintiff(s), at the time of the accident that is the subject of this lawsuit, was/were not using the available functional and operational seat belt/shoulder harness restraint system.
18. The Plaintiff was not wearing the available and fully operational seat belt at the time of the accident.
19. The Plaintiff's failure to use the seat belt or harness produced or contributed substantially to at least a portion of the Plaintiff's damages claimed in the lawsuit.
20. This action is subject to the Florida Motor Vehicle No Fault Law, Florida Statute Section 627.7405.
21. That the Plaintiff's injuries do not meet the threshold requirements of Section 627.737(2), Florida Statutes.
22. At the time and place of the incident described in the Complaint, Defendant(s) complied with the provisions and security requirements set forth in Florida Statute 627.733.
23. Plaintiff(s) is/are insured person(s) under the Personal Injury Protection portion of an automobile insurance policy which was in force on the date of the incident described in the Complaint which provides payment of benefits of eighty (80%) percent of all reasonable and necessary medical expenses incurred and sixty (60%) percent of loss of income or earning capacity from inability to work as a result of injury sustained from the incident described in the Complaint to a maximum of Ten Thousand Dollars (\$10,000.00).