



Requests for Admission

Sample

What are requests for admission?

Requests for Admission are written statements asking the opposing party to admit or deny specific facts. EvenUp's Request for Admission templates are optimized to secure key admissions that narrow disputes and strengthen settlement leverage.

Requests for Admission

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IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA Avery Monroe, Plaintiff(s), v. Samir Qureshi, Defendant(s).	IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA Case No.: 2024-CA-019847 PLAINTIFF'S RESPONSES TO DEFENDANT'S REQUESTS FOR ADMISSION
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Avery Monroe ("Plaintiff"), by and through her attorney, Maria Elena Rodriguez, provides the

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT

IN AND FOR MIAMI-DADE COUNTY,
FLORIDA

Avery Monroe,

Plaintiff(s),

v.

Samir Qureshi,

Defendant(s).

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

Case No.: 2024-CA-019847

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S REQUESTS FOR
ADMISSION**

Avery Monroe ("Plaintiff"), by and through her attorney, Maria Elena Rodriguez, provides the following responses and objections to Defendant's Requests for Admission:

These responses are made in good faith and based on information presently known and reasonably available. Plaintiff reserves the right to amend or supplement these responses as additional facts become known, witnesses are identified, or expert opinions are obtained.

Each response incorporates the general objections stated below. The fact that Plaintiff responds to a particular request does not waive any applicable objection, privilege, or protection. By providing these responses, Plaintiff does not concede the relevance, materiality, or admissibility of any request or admission, and expressly preserves all objections available under the Florida Rules of Civil Procedure, the rules of evidence, and applicable law, including:

- The attorney–client privilege and work-product doctrine;
- Objections to requests that are vague, ambiguous, compound, or call for a legal conclusion; and
- The right to deny requests pending completion of discovery where the information sought is not yet fully known.

All responses are made solely for discovery purposes and shall not be construed as admissions of liability or relevance for trial or evidentiary purposes.

Request for Admission No. 1

Admit that on January 25, 2023, you were operating a motor vehicle on a public roadway in Hidalgo County, Texas.

Response:

Denied. Plaintiff was operating a motor vehicle on a public roadway on May 17, 2024, in Miami-Dade County, Florida.

Request for Admission No. 2

Admit that the motor vehicle collision that is the subject of this lawsuit occurred on January 25, 2023.

Response:

Denied. The motor vehicle collision that is the subject of this lawsuit occurred on May 17, 2024.

Request for Admission No. 3

Admit that at the time of the collision, you were not maintaining a proper lookout.

Response:

Plaintiff objects to this request as vague, argumentative, and as assuming facts not established.

Subject to and without waiving these objections, Plaintiff denies the request. Plaintiff was attentive to traffic conditions and appropriately responded by applying her brakes and reducing speed when traffic slowed ahead.

Request for Admission No. 4

Admit that you failed to yield the right of way to Defendant's vehicle immediately before the collision.

Response:

Plaintiff objects to this request as assuming facts not established, as argumentative, and as inapplicable to the circumstances of this rear-end collision where both vehicles were traveling in the same lane and direction.

Subject to and without waiving these objections, Plaintiff denies the request. Plaintiff was lawfully traveling in her lane of travel and appropriately slowing for traffic conditions when Defendant's vehicle struck the rear of Plaintiff's vehicle.

Request for Admission No. 5

Admit that you were using a cellular telephone at the time of the collision.

Response:

Denied. Plaintiff was not using a cellular telephone or any other handheld electronic device at the time of the collision and was focused on driving.

Request for Admission No. 6

Admit that you did not apply your brakes prior to the collision.

Response:

Denied. Plaintiff applied her brakes and reduced her speed to approximately 15-20 mph in response to slowing traffic ahead due to construction lane closures.

Request for Admission No. 7

Admit that you were cited by law enforcement at the scene of the collision.

Response:

Denied. No citation was issued to Plaintiff at the scene of the collision.

Request for Admission No. 8

Admit that you have been involved in at least one other motor vehicle collision within the five (5) years preceding January 25, 2023.

Response:

Denied. Plaintiff was not involved in any motor vehicle collision within the five years preceding January 25, 2023.

Request for Admission No. 9

Admit that you did not have valid automobile insurance at the time of the collision.

Response:

Denied. Plaintiff had valid automobile insurance coverage with State Farm Insurance at the time of the collision on May 17, 2024.

Request for Admission No. 10

Admit that the weather conditions were clear and dry at the time of the collision.

Response:

Denied. The weather conditions at the time of the collision were light rain with wet pavement and wet road conditions.

Request for Admission No. 11

Admit that the roadway surface was dry at the time of the collision.

Response:

Denied. The roadway surface was wet at the time of the collision.

Request for Admission No. 12

Admit that visibility was not impaired by any environmental conditions at the time of the collision.

Response:

Plaintiff objects to this request as vague and ambiguous to the extent the term "impaired" is undefined and subjective.

Subject to and without waiving this objection, Plaintiff denies the request. Environmental conditions at the time of the collision included dusk lighting and light rain with wet pavement.

Request for Admission No. 13

Admit that you did not signal your intention to turn or change lanes prior to the collision.

Response:

Plaintiff objects to this request as assuming facts not established.

Subject to and without waiving this objection, Plaintiff denies the request. Plaintiff was traveling straight in the center lane and braking for slowing traffic conditions prior to the collision and was not turning or changing lanes.

Request for Admission No. 14

Admit that you have not incurred medical expenses exceeding \$10,000.00 as a result of the collision.

Response:

Denied. Plaintiff has incurred medical expenses totaling \$71,154.50 as a result of the collision.

Request for Admission No. 15

Admit that you returned to work within seven (7) days following the collision.

Response:

Denied. Plaintiff was unable to return to work for twelve weeks following the collision and returned only to modified duty with permanent restrictions.

Request for Admission No. 16

Admit that you did not require emergency medical transportation from the scene of the collision.

Response:

Denied. Plaintiff was transported from the collision scene by Miami-Dade Fire Rescue via emergency ambulance to Jackson Memorial Hospital on May 17, 2024.

Request for Admission No. 17

Admit that your vehicle was not totaled as a result of the collision.

Response:

Plaintiff cannot admit or deny this request after reasonable inquiry. The determination of whether the vehicle was declared a total loss by insurance carriers requires access to complete property damage claim files and insurance adjustments that are not presently available. Plaintiff notes that her 2018 Honda CR-V sustained severe rear-end damage including a bent frame and deployed airbags as a result of the collision caused by Defendant.

Request for Admission No. 18

Admit that you have not been diagnosed with any permanent injury as a result of the collision.

Response:

Denied. Plaintiff has been diagnosed with permanent injuries and impairment as a result of the collision, including permanent mild cognitive impairment and vestibular dysfunction, chronic pain syndrome, permanent work restrictions, and an 8% whole person impairment rating.

Request for Admission No. 19

Admit that Exhibit A attached hereto is a true and correct copy of the police report for the collision.

Response:

Plaintiff objects to this request as seeking information outside her personal knowledge and control. Authentication of a document as a "true and correct copy" requires foundation from the custodian of records or other person with knowledge of the copying process, which Plaintiff does not possess.

Subject to and without waiving this objection, Plaintiff cannot admit or deny whether Exhibit A is a true and correct copy of the police report, as she has no personal knowledge of the document copying or certification process. However, Plaintiff states that a Florida Traffic Crash Report (Case No. 2024-05-17-1942-A79) was prepared by the Miami-Dade Police Department regarding the May 17, 2024 collision, and to the extent Exhibit A purports to be that report, Plaintiff can confirm she was involved in the collision documented therein.

Request for Admission No. 20

Admit that you were not wearing corrective lenses at the time of the collision, despite being required to do so by your driver's license restrictions.

Response:

Plaintiff objects to this request as assuming facts not established, specifically that Plaintiff was required to wear corrective lenses by driver's license restrictions.

Subject to and without waiving this objection, Plaintiff denies the request.

Dated: December 5, 2025

Respectfully submitted,

MARIA ELENA RODRIGUEZ

Attorney for Plaintiff
Rodriguez & Associates, P.A.
1200 Brickell Avenue
Suite 1800
Miami, FL 33131
(305) 358-5555
Florida Bar No. 0123456

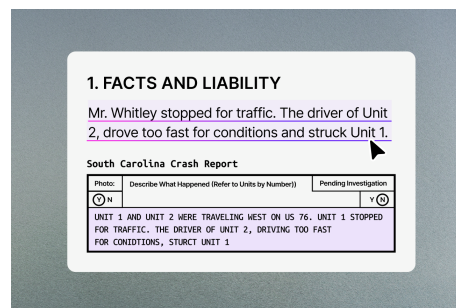
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