

GRAY
Plaintiff

IN THE CIRCUIT COURT FOR PRINCE
GEORGE'S COUNTY, MARYLAND

CASE NO.: CAL05-

v.

ALLSTATE INSURANCE COMPANY

Defendant

RESPONSE TO ADMISSIONS

Defendant, Allstate Insurance Company, by and through the undersigned counsel, files this Response to Plaintiff's second set of a Request for Admissions, and would state:

1. Request: You denied in your answers to Requests for Admission that Plaintiff sustained any injuries in this accident before you ever provided medical records form Ms. Gray to a medical doctor or any other health care provider.

Response: Admitted.

2. Request: You denied in your answers to Requests for Admission that Plaintiff medical bills were fair, reasonable and medially necessary before you ever provided medical records from Ms. Gray to a medical doctor or any other health care provider.

Response: Admitted.

3. Request: did not have a valid policy of automobile insurance in effect at the time of the accident.

Response: Admitted.

4. Request: Allstate concluded in its investigation of the accident that s negligence caused the accident.

Response: Denied. The burden of proving s negligence, and causation of the accident lies with the Plaintiff.

5. Request: Allstate has no evidence that Renee Gray was contributorily negligent in the accident.

Response: Admitted. Defendant reserves the right to amend this response pending discovery.

6. Request: Allstate has no evidence to support its first defense in its Answer in this case.

Response: Admitted.

7. Request: Allstate has no evidence to support its second defense in its Answer in this case.

Response: Denied.

8. Request: Allstate has no evidence to support its third defense in its Answer in this case.

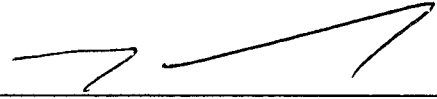
Response: Admitted. Defendant reserves the right to amend this response pending discovery.

9. Request: Allstate has no evidence to support its fourth defense in its Answer in this case.

Response: Admitted.

10. Request: Allstate has no evidence to support its fifth defense in its Answer in this case.

Response: Denied.



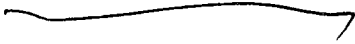
Jeffrey S. Seal, Esq., - Staff Counsel
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Attorney for Defendant
Allstate Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Plaintiff's second set of Admissions was mailed, postage prepaid, this 12th day of September, 2005, to:

Miller & Zois, LLC
Ronald V. Miller, Jr., Esquire
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7310 Ritchie Highway
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Jeffrey S. Seal, Esq.

bap