

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

[REDACTED]

*

Plaintiff

*

v.

*

CASE NO.: [REDACTED]

[REDACTED] et al.

*

Defendants

*

* * * * *

RESPONSE TO PLAINTIFF'S REQUEST FOR ADMISSIONS

Defendants, A&R Transport, Inc., and Denis Miller, by and through counsel, Andrew Stephenson and Franklin & Prokopik, pursuant to Maryland Rule 2-424, respond to the Plaintiffs' First Request for Admissions and in so doing state as follows

REQUEST NO. 1

You were properly served with the summons and complaint in the above-captioned case.

RESPONSE NO. 1

Admitted.

REQUEST NO. 2

You have no basis to assert as a defense or affirmative defense to the subject accident, lack of personal jurisdiction.

RESPONSE NO. 2

Admitted.

REQUEST NO. 3

The Defendant have no evidence to support the affirmative defense that the Plaintiff's case is barred by the Statute of Limitations.

RESPONSE NO. 3

Admitted.

REQUEST NO. 4

The Defendant has no evidence to support the affirmative defense that the Plaintiff's case fails to state a claim upon which relief can be granted.

RESPONSE NO. 4

Denied.

REQUEST NO. 5

The Defendant has no evidence to support the affirmative defense that the Plaintiff assumed the risk of her injuries.

RESPONSE NO. 5

Denied.

REQUEST NO. 6

The Defendant has no evidence to support the affirmative defense that the Plaintiff was not contributorily negligent.

RESPONSE NO. 6

Denied.

REQUEST NO. 7

You were driving a motor vehicle that collided with a vehicle in which the Plaintiff was a passenger.

RESPONSE NO. 7

Denied.

REQUEST NO. 8

Industrial Refrigeration Services, Inc. purchased or leased a vehicle from Miller Brothers, Ford., Inc. located in Ellicott City, Maryland bearing temporary tag # [REDACTED].

RESPONSE NO. 8

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.

REQUEST NO. 9

Industrial Refrigeration Services, Inc. purchased or leased a vehicle from Miller Brothers, Ford., Inc. located in Ellicott City, Maryland with a vehicle identification number [REDACTED].

RESPONSE NO. 9

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.

REQUEST NO. 10

The vehicle purchased or leased from Miller Brothers, Ford., Inc. bearing temporary tag # [REDACTED] and identified by vehicle identification number [REDACTED] was insured on the date of the accident.

RESPONSE NO. 10

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.

REQUEST NO. 11

No other entity contributed to cause the car crash.

RESPONSE NO. 11

Defendant objects to this Request on the basis that it is vague and ambiguous. Without waiving and subject to that objection, Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.

REQUEST NO. 12

You have given a signed or recorded statement in this case.

RESPONSE NO. 12

Admitted with regard to signed statement.

REQUEST NO. 13

You consumed drugs, medicines, or alcoholic beverages within twenty-four (24) hours prior to said occurrence.

RESPONSE NO. 13

Denied.

REQUEST NO. 14

You were under care of a physician at the time of the occurrence.

RESPONSE NO. 14

Defendants object and refuse to respond to this Request on the basis of relevance. Defendant, Miller, has not made his physical condition an issue in this case and such information would be private, personal and confidential.

REQUEST NO. 15

The attached medical records and bills Bates stamped 01 - 334 are authentic.

RESPONSE NO. 15

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 16

The medical treatment rendered by **Bethel Medical Clinic** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 16

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 17

The medical treatment rendered by **Walbridge Physical Medicine and Rehab** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 17

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 18

The medical treatment rendered by **Matrix Physical Therapy** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 18

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 19

The medical treatment rendered by K&S **Chiropractic** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 19

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 20

The medical treatment rendered by **Dr. Polotrak** and bill for services rendered was fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 20

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 21

The medical treatment rendered by **Maryland Orthopaedics** and bill for services rendered

were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 21

Defendants are currently without sufficient information knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 22

The medical treatment rendered by **Washington Adventist Healthcare** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 22

Defendants are currently without sufficient information knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 23

The medical treatment rendered by **Bay Area Orthopaedics** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 23

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 24

The medical treatment rendered by **American Radiology** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 24

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 25

The medical treatment rendered by **Patterson Physical Therapy** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 25

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 26

The Prescriptions and bills for the prescriptions attached hereto were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 26

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 27

The medical treatment rendered by **Annapolis Healthcare Supplies** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 27

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date. Denied.

REQUEST NO. 28

The medical treatment rendered by **Imaging Associates of Washington** and bill for services rendered were fair, reasonable, necessary, and causally related to the car crash complained of in the Plaintiff's Complaint.

RESPONSE NO. 28

Defendants are currently without sufficient information, knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.

Denied.

REQUEST NO. 29

The Plaintiff did sustain injuries as a result of the accident which took place on March 12, 2002.

RESPONSE NO. 29

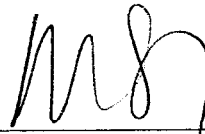
Defendants are currently without sufficient information knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.
Denied.

REQUEST NO. 30

The Plaintiff did require necessary medical treatment as a result of the accident that took place on March 12, 2002.

RESPONSE NO. 30

Defendants are currently without sufficient information knowledge or belief to admit or deny this request. Discovery is ongoing and Defendants may supplement their response at a later date.
Denied.



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