

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA  
CIVIL DIVISION

MEIBEL SABOYA DIAZ,

Plaintiff,

vs.

CASE NO.: 2023-CA-000499

SEAWORLD PARKS &  
ENTERTAINMENT LLC, D/B/A  
BUSCH GARDENS,

DIVISION: E

Defendant.

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**DEFENDANT SEAWORLD PARKS & ENTERTAINMENT LLC'S  
FIRST REQUEST TO PRODUCE TO PLAINTIFF MEIBEL SABOYA DIAZ**

Defendant SeaWorld Parks & Entertainment LLC requests Plaintiff Meibel Saboya Diaz to produce for inspection and copying each of the following:

**REQUEST FOR PRODUCTION NO. 1:**

Duplicate negatives of all photographs taken the day of the subject alleged incident. If the photos were taken by a digital camera, produce duplicates of the original photographs without modifications.

**REQUEST FOR PRODUCTION NO. 2:**

Duplicate negatives of all photographs, videotapes or films of the scene of the subject alleged incident, of the Plaintiff Meibel Saboya Diaz in her injured condition, of any re-enactment of the incident, or any photographs, videotapes or films that relate to the subject accident. If the photos were taken by a digital camera, produce duplicates of the original photographs without modifications.

**REQUEST FOR PRODUCTION NO. 3:**

All medical bills, including, but not limited to, bills from doctors, hospitals, prescriptions, therapists and ambulance service, that are related to damages allegedly suffered as a result of the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 4:**

Hospital records, including x-rays, concerning all hospitalizations which Plaintiff Meibel Saboya Diaz claims resulted from the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 5:**

Medical reports, x-rays, opinions, or other written memoranda from doctors, nurses, or other medical practitioners, or expert witnesses containing information concerning the injuries and/or damage allegedly sustained by Meibel Saboya Diaz as a result of the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 6:**

Records of Plaintiff Meibel Saboya Diaz for any medical treatment, or any hospitalizations within the twenty (20) years immediately preceding the date of the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 7:**

All receipts, bills, cancelled checks, statements or other documents representing expenses incurred as a result of the accident and injuries complained of by Plaintiff other than the medical bills previously requested.

**REQUEST FOR PRODUCTION NO. 8:**

All bills, records, reports or documentary evidence of any kind concerning any psychiatric, psychological and/or personal counseling care rendered to Plaintiff within twenty (20) years immediately preceding the date of the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 9:**

All bills, records, reports or documentary evidence of any kind concerning any psychiatric, psychological and/or personal counseling care rendered to Plaintiff from the date of the subject alleged incident to the present.

**REQUEST FOR PRODUCTION NO. 10:**

All settlement documents, releases, indemnity agreements or hold harmless agreements of any kind dealing with the damages you allege as a result of the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 11:**

All papers, receipts, bills or written documents of any kind which evidence any monies expended by you or anyone on your behalf, for services which normally would have been performed by you, had the injuries which you allege in the subject alleged incident not occurred.

**REQUEST FOR PRODUCTION NO. 12:**

All papers, receipts, bills or written documents of any kind which evidence expenses other than physicians or hospital bills allegedly incurred as a result of the subject alleged incident, including but not limited to those for orthotic devices, crutches, household expenses, etc.

**REQUEST FOR PRODUCTION NO. 13:**

Income tax returns for Plaintiff, including joint returns, for the years 2014 to the present, including W-2 forms, or, in the alternative, completed Forms 4506, Request for Copy or Transcript of Tax Form, which are attached hereto, so that the undersigned may obtain said information and will provide you with a copy of same once received.

**REQUEST FOR PRODUCTION NO. 14:**

Each item of tangible evidence that was removed from the scene of the subject alleged incident that you have in your possession.

**REQUEST FOR PRODUCTION NO. 15:**

A copy of any and all policies of insurance that may provide benefits or coverage to the Plaintiff and/or any of the parties involved in this action for any claimed injury or damage resulting from the subject alleged incident, including but not limited to disability and/or health.

**REQUEST FOR PRODUCTION NO. 16:**

All claims forms, applications for benefits and written documents of any kind which evidence application for, receipt of or claim for health, disability or other insurance benefits allegedly necessitated by the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 17:**

A copy of all pleadings, discovery or other materials compiled pertaining to any lawsuit, worker's compensation claim, insurance claim or other claim involving Plaintiff.

**REQUEST FOR PRODUCTION NO. 18:**

All documentation relating to any insurance claim for the subject alleged incident.

**REQUEST FOR PRODUCTION NO. 19:**

All documentation relating to any claim from any insurance company relating to previous or subsequent accidents or occurrences involving Plaintiff.

**REQUEST FOR PRODUCTION NO. 20:**

Police reports, traffic reports and/or official reports relating to any other accidents involving Plaintiff.

**REQUEST FOR PRODUCTION NO. 21:**

Any resumes and/or curriculum vitae for each expert you intend to utilize at the trial of this cause.

**REQUEST FOR PRODUCTION NO. 22:**

All reports and affidavits by each expert retained in this case who you intend to utilize at the trial of this cause.

**REQUEST FOR PRODUCTION NO. 23:**

All reports, diagrams, drawings or photographs from each expert you intend to utilize at the trial of this cause.

**REQUEST FOR PRODUCTION NO. 24:**

All documents sent to each expert you intend to utilize at the trial of this cause.

**REQUEST FOR PRODUCTION NO. 25:**

All statements, whether written, transcribed or recorded by any means, made by Defendant to the litigation, including the Defendant's agents, representatives, employees currently employed or previously employed by Defendant.

**REQUEST FOR PRODUCTION NO. 26:**

A copy of all written, recorded or transcribed statements made or given by you relating to or pertaining to the subject alleged incident. This request includes messages sent via electronic mail; posted on social media accounts and their respective messengers, such as Facebook, Tumblr, Instagram, or Snapchat; and, text messages.

**REQUEST FOR PRODUCTION NO. 27:**

A copy of all written, recorded or transcribed statements made or given by any witness relating to or pertaining to the subject alleged incident. This request includes messages sent via electronic mail; posted on social media accounts and their respective messengers, such as Facebook, Tumblr, Instagram, or Snapchat; and, text messages.

**REQUEST FOR PRODUCTION NO. 28:**

All documents, receipts, checks or invoices reflecting the total amount of collateral source benefits paid as a result of the subject alleged incident which is the subject of this litigation. For the purposes of this request “collateral sources” includes, but is not limited to, any payment made to the Plaintiff, or on her behalf, by or pursuant to:

- (a) the United States Social Security Act;
- (b) any federal, state or local income disability insurance, and any similar insurance benefits available to the Plaintiff whether purchased by her or provided by others.
- (c) any health, sickness or income disability insurance, and any other similar insurance benefits available to the Plaintiff whether purchased by her or provided by others;
- (d) any contract or other agreement of any group, organization, partnership or corporation to pay for or reimburse the cost of hospital, medical, dental or other health care services; or
- (e) any contractual voluntary wage continuation plan provided by employers or any other system intended to provide wages during the period of disability.

**REQUEST FOR PRODUCTION NO. 29:**

All certificates, awards of evidence of achievement or recognition from any and all clubs, public service activities, armed services or charities pertaining to Plaintiff.

**REQUEST FOR PRODUCTION NO. 30:**

Resume for Plaintiff.

**REQUEST FOR PRODUCTION NO. 31:**

Transcripts and other records in your possession from high school, college or any other education since high school for Plaintiff.

**REQUEST FOR PRODUCTION NO. 32:**

A copy of any journal, diary, day planner, or other writing (and/or drafts thereof) authored by Plaintiff (including but not limited to those on computer hard drives, flash drives, zip drives, backup disks, or other electronic device) containing writings about Plaintiff’s version of the subject alleged incident, medical treatment, mental health treatment, the state of her alleged injuries, emotions or mental health written after the subject alleged incident at issue in this case.

**REQUEST FOR PRODUCTION NO. 33:**

A copy of Plaintiff Meibel Saboya Diaz’s driver’s license.

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