

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

**MEIBEL SABOYA DIAZ,  
PLAINTIFF,**

**VS.**

**Case No: 2023 CA 000499**

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

**DEFENDANT.**

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**NOTICE OF SERVING PLAINTIFF'S  
REQUEST FOR PRODUCTION TO DEFENDANT**

Plaintiff, by and through the undersigned attorney, and pursuant to F.R.C.P. 1.350, hereby gives notice of serving Plaintiff's Request for Production upon the Defendant(s), numbered 1 through 16, to be answered within the deadlines listed within the Florida Rules of Civil Procedure, and as required by law.

*[Certificate of Service on Next Page]*

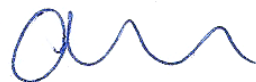
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing document has been furnished by Electronic Mail in accordance with Fla. R. Jud. Admin. 2.516, or in accordance with the relevant applicable Florida Rule of Civil Procedure, to the referenced party on the date below, and at the following designated email service address(es):

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Dated March 31, 2023.



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**PLAINTIFF'S REQUEST FOR PRODUCTION TO DEFENDANT**

Plaintiff, pursuant to Fla. R. Civ. P. 1.350, hereby requests the Defendant, SEAWORLD PARKS & ENTERTAINMENT LLC, D/B/A BUSCH GARDENS, to produce the following items at the law office of the Kenyon Law Group, PLLC, within the time period designated by the rules:

1. Any and all statements of the Plaintiff taken and or in the possession of the defendant.
2. Any and all photographs, films, movies, video-tapes or other pictures of the Plaintiff, the injury scene and the subject premises (on the walkway near the SkeiKra ride) at Defendant's premises on November 2, 2019 and any date thereafter.
3. Any and all insurance policies (in full and certified under oath in accordance with the law) that may provide coverage to you for the facts and circumstances alleged in the complaint. This request includes but is not limited to any and all addenda, riders, amendments, conditions thereto, as well as any and all declaration sheets or pages.

4. Any and all written or recorded statements made by any witness, defendant, and employee or agent of Defendant, in reference to the subject incident or in reference to the injuries received as a result of the subject incident.

5. Any and all contracts between the defendants and any company or person responsible for operating, securing or maintaining a slip resistant surface for defendant near the SkeiKra ride where Plaintiff is alleged to have fallen, as such contracts existed between November 2, 2017 and November 2, 2019.

6. Copies of any and all lawsuits filed against you for alleged personal injuries or negligence specifically relating to the Plaintiff falling on the walkway near the SkeiKra ride.

7. Any and all incident reports, photographs, video tapes, audio tapes, diagrams, illustrations, reproductions, witness statements, memoranda, forms, notes, correspondence, and any and all other documents which describe, refer to or depict any person and or Plaintiff falling on the walkway near the SkeiKra ride, and which occurred within three years before the subject incident and through the present date as of the time Defendant responds to this request.

8. Any and all records, logs, diaries, calendars, work orders, invoices, receipts and any and all other documents which describe or refer to any cleaning or maintenance to the walkway near the SheiKra ride, in or around the area where the Plaintiff fell, and which were generated or received at any time within three years before the subject incident and to the present date.

9. Any and all manuals, employee handbooks, brochures, training videos, and literature which describes or refers to rules, regulations, or policies of the Defendant in regard to Defendant or its agents cleaning or maintaining the walkway near the SheiKra ride, in or around the area where the Plaintiff fell, from three years before the subject incident to the present date.

10. Any and all documents, including but not limited to invoices, work orders, purchase orders, payment records, check stubs, cancelled checks, and agreements, which relate or refer to any maintenance, repair, modification or reconstruction which occurred at any time within the last three years to the walkway near the SheiKra ride, in or around the area where the Plaintiff fell.

11. Any and all memos or notices distributed to employees at any time in the last four years regarding cleaning and maintaining the walkway near the SheiKra ride, in or around the area where the Plaintiff fell.

12. Any and all time cards, payroll records, employee rosters, and other records which show, indicate or refer to the names, addresses, and titles of employees who were in or near the area of the incident on or about the time of the subject incident.

13. Any and all correspondence generated by or received from the liability insurance company or the insurance agent for the Defendant in reference to coverage or coverage dispute in reference to the subject incident.

14. Any and all notices, forms, citations, letters, and any and all other writings received from or sent to any local, state, or federal officials, agencies, administration or department generated at any time from five (5) years ago through the date on which these documents are produced, and which relate directly or indirectly to the Defendant's or its agents cleaning, maintenance, repair or safety of the walkway near the SheiKra ride, in or around the area where the Plaintiff fell. The agencies, administrations or departments referred to in this request include but are not limited to the OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA), and The United States Public Health Service (U.S.P.H.S.).

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